

Metering Dispensation D/536 – Metering Dispensation from the requirement to re-calibrate Meters (CoPs 3 and 5)

Imbalance Settlement Group (ISG)

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Owner/author **Chris Day**

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Summary

Issue 97 – “Meter shortage risk driven by global materials availability and supply chain challenges” was raised on 20 August 2021. It aims to understand the risk to BSC processes such as New Connections and Meter exchanges caused by the current Meter shortage and recommend any potential mitigation options that may be required. This Metering Dispensation proposes to grant a derogation from CoP4 Appendix A for the requirement to re-calibrate Meters registered against CoPs 3 and 5 as recommended by the Issue 97 Working Group.

We invite the ISG to approve Metering Dispensation D/536 against Code of Practice 4 on a temporary basis for 18 months, as a generic Metering Dispensation on the condition that any Meters that were due for calibration in the time period (18 months from approval) for which the Metering Dispensation applies should be re-calibrated or replaced within two years of the end date of this Metering Dispensation.

1. BSC requirements

- 1.1 Section L¹ of the Balancing and Settlement Code (BSC) requires all Metering Equipment to either:
 - comply with the requirements set out in the relevant Code of Practice (CoP) at the time the Metering System is first registered for Settlement under the BSC (L3.2.2); or
 - be the subject of, and comply with, a Metering Dispensation (L3.4).
- 1.2 Section L allows the Registrant of a Metering System to apply for a Metering Dispensation if, for financial or practical reasons, Metering Equipment will not or does not comply with some or all the requirements of a CoP.
- 1.3 Section L also allows the Panel, or any BSC Party, to raise a generic Metering Dispensation. In this case the Panel needs to consult with all BSC Parties.
- 1.4 The process for applying for a Metering Dispensation is set out in [BSCP32](#)².

¹ 'Metering'

² 'Metering Dispensations'

2. Background to Metering Dispensation D/536

- 2.1 Due to a global shortage of materials and the on-going impacts of COVID-19 on global supply chains, there is a shortage of semi-conductors, among other crucial components, which impacts the ability of Meter manufacturers to produce Meters with integral Outstations.
- 2.2 This is impacting on the availability of various types of electricity Meters including those required for Settlement under the BSC. This shortage of Settlement Meters could impact on a number of Balancing and Settlement Code (BSC) processes. This issue is also impacting the availability of Current Transformer (CT) operated metering, which has the highest potential for material impact (due to usually being installed at higher consumption/higher voltage sites).
- 2.3 Issue 97 – “Meter shortage risk driven by global materials availability and supply chain challenges” was raised on 20 August 2021. It aims to understand the risk to BSC processes such as New Connections and Meter exchanges caused by the Meter shortage and recommend any potential mitigation options that may be required.
- 2.4 One of the mitigation options recommended by the Issue 97 group was to raise a temporary Metering Dispensation from CoP4 for the requirement to periodically calibrate Meters.

3. Metering Dispensation D/536

- 3.1 CoP4 Appendix A sets out the maximum period for which Meters can be installed without re-calibration by CoP.

By Year	0	5	10	15	20	25	30	35	40
CoP1 & CoP2	A	-	C	-	C	-	C	-	C
		B _m ¹²	B _c	C _m + B _c	B _m	B _c	C _c + B _m	B _m	B _c
CoP3, 5, 6 & 7	A	-	-	B	C	B	B	B	C

- 3.2 This Metering Dispensation is proposed to grant a derogation from CoP4 Appendix A for the requirement to re-calibrate Meters registered against CoPs 3 and 5 that may be required for re-calibration due to being in situ for a period shown in the above table.
- 3.3 Re-calibration of CoPs 1 and 2 Meters are not included within the scope of this Metering Dispensation. The Issue 97 group felt that the benefits achieved by granting a temporary derogation from the requirement to re-calibrate did not outweigh the risks of Meters drifting outside of the accuracy limits prescribed in the relevant CoP, where Meters were registered against CoPs 1 or 2.
- 3.4 Re calibration of CoP10 Meters are not included within the scope of this Metering Dispensation as CoP10 Meters are not subject to periodic calibration for Settlement purposes.
- 3.5 The Metering Dispensation is proposed for a period of 18 months from the date of approval.
- 3.6 Allowing Meter Operator Agents (MOA) to leave Meters installed without the need for re-calibration will help alleviate the pressures currently faced with attempting to replace Meters under the current Meter shortage conditions as most MOAs replace the Meter before the maximum period for re-calibration is reached (particularly for CoP3 and CoP5 Metering Systems).
- 3.7 Elxon proposes that a condition to this Metering Dispensation should be added so that any Meters that were due for calibration in the time period (18 months from approval) for which the Metering Dispensation applies should be re-calibrated or replaced within two years of the end date of this Metering Dispensation.

4. MDRG comments

- 4.1 We circulated the Metering Dispensation application to the Metering Dispensation Review Group (MDRG) for comment.
- 4.2 At the time of writing no MDRG members have responded. However the deadline for MDRG response is Wednesday 5 January.
- 4.3 Elexon will present any MDRG responses received after the submission of the paper at the ISG Meeting on the 11 January.

5. NETSO comments

- 5.1 We circulated the Metering Dispensation application to the National Electricity Transmission System Operator (NETSO) for comment.
- 5.2 The NETSO had one question on the application. They asked what Calibration Types the application was proposed to apply to. They stated that:
- 5.2.1 *I can understand the reasoning for applying this to type B and C calibrations (as it delays the need to potential replace a meter) but what's the rationale for type A? If a meter is subject to a type A calibration, then (from reading the dispensation) it must be a new meter and so doesn't help alleviate the meter shortage?*
- 5.3 Elexon confirmed that the Metering Dispensation is only proposed to apply to Type B and Type C Calibrations

6. Supplier Volume Allocation Group

- 6.1 According to the [BSC Baseline Statement](#) the Supplier Volume Allocation Group (SVG) are jointly responsible, with the ISG, for CoP4. Therefore, we will be taking a similar decision paper to the SVG for non-compliance with CoP 4.

7. Generic Metering Dispensation consultation responses

- 7.1 Before considering a generic Metering Dispensation (L3.4.4) the Panel needs to consult with all Parties (L3.4.5), and with such other persons if any as the Panel shall consider appropriate. The MDRG is considered an Appropriate party under BSCP32.
- 7.2 In December 2021, on behalf of the Panel, we consulted with all BSC Parties via a generic [Metering Dispensation consultation for D/536](#).
- 7.3 We asked the following two consultation questions:
- Q1. Do you agree that the proposed Metering Dispensation D/536 should be granted on a temporary basis for a period of 18 months
 - Q2. Please provide your reasoning for the answer given in question 1 of this consultation
- 7.4 The deadline for responses is Wednesday 5 January.
- 7.5 Elexon will present any responses received after the submission of the paper at the ISG Meeting on the 11 January.

8. Elexon's view

- 8.1 Elexon support this Generic Metering Dispensation application as it will mitigate against the risks to BSC processes caused by Meter shortages as identified by the Issue 97 Workgroup.

9. Recommendations

- 9.1 We invite the ISG to:
- a) **APPROVE** Metering Dispensation D/536 against Code of Practice 4 on a temporary basis for 18 months, as a generic Metering Dispensation on the condition:
- that any Meters that were due for calibration in the time period (18 months from approval) for which the Metering Dispensation applies should be re-calibrated or replaced within two years of the end date of this Metering Dispensation.; and

b) **NOTE** we will present a similar paper to the Supplier Volume Allocation Group, with a similar recommendation, in respect of CoP 4.

Attachments

Attachment A – Metering Dispensation application D/536

For more information, please contact:

Chris Day, Metering Analyst
christopher.day@elexon.co.uk
07917 471366