ELEXON

CP Assessment Report

CP1587 ‘Obsolete Metering Equipment’

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Committee

Imbalance Settlement Group (ISG) and Supplier Volume Allocation Group (SVG)

Contact

Jacob Snowden

020 7380 4260

jacob.snowden@elexon.co.uk

BSC.change@-elexon.co.uk

About This Document

You can find the definitions of the terms and acronyms used in this document in the BSC Glossary[1].

This document is the Change Proposal (CP) Assessment Report for CP1587 which Elexon will present to the ISG and the SVG at their respective meetings on 9 January 2024. The Committees will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1587. There are four parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the ISG an SVG’s initial views on the proposed changes.
- Attachment A contains the CP proposal form.
- Attachment B contains the proposed redlined changes to deliver the CP1587 solution
- Attachment C contains the full responses received to the CP Consultation.

[1] https://www.elexon.co.uk/glossary/?show=all

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1. Summary

Why change?

There are types of Meter/Outstation that are no longer manufactured and 'unsupported' by the Meter/Outstation manufacturer. The BSC does not currently set out which Meter/Outstation Types are currently manufactured and whether supported or not in the Code of Practice (CoP) Compliance Protocol Approvals[2] list. There is also no process in BSCP601 'Metering Protocol Approval and Compliance Testing'[3] for Elexon to check with Meter/Outstation manufacturers whether an approved Meter/Outstation Type is manufactured and supported, and where not manufactured or supported take any action to prevent continued installation of the relevant Meter/Outstation Type.

There is a risk to Settlement where Meters/Outstations are installed, or continued to be left in service, where they are no longer supported or spares are unavailable. Similar issues apply to Data Collectors where they can no longer support a protocol for a particular Meter/Outstation Type or wish to withdraw from the market. The BSC does not currently set out which Data Collectors currently can support a particular Meter/Outstation Type.

Elexon still has an obligation under BSCP601 to notify the Panel[4] of certificates issued and updates to the Compliance Approval and Protocol Approval list. BSCP601 also places an obligation on Elexon to notify Parties and Party Agents of new approvals. Elexon does this via a Newscast[5] article. There is an administrative burden placed on Elexon in producing a paper for the relevant BSC Panel Committee.

Solution

CP1587 seeks to amend sections 1.1 (Scope and Purpose of the Procedure), 1.2 (Main Users of Procedure and their Responsibilities) and 1.3 (Use of the Procedure) of BSCP601 to define the new process and obligations on stakeholders.

CP1857 will also remove the obligation to notify the Panel sub-Committees, via an information paper, of certificates issued and updates to Compliance and Protocol Approval list in sections 2 'Interface and Timetable Information' for parts 2.1, 2.2 and 2.3 and rely on the weekly Newscast to inform industry of new, or updates to existing, Compliance and Protocol Approvals. The obligation to produce a paper where an issue has been identified with a Compliance or Protocol Approval will remain in section 2.4.

CP1587 will also add processes (2.5 and 2.6) in section 2 'Interface and Timetable Information' to confirm whether Meter/Outstation Types are still manufactured and/or supported, and where confirmation that a Data Collector can no longer support a Protocol, to notify Parties and Party Agents. In the case of unsupported Meter/Outstation Types give a transition period to remove unsupported Meter/Outstation Types.

Impacts and costs

CP1587 will impact all Agents and BSC Parties who install Meters and who own the Meters. There may also be an impact on Half Hourly Data Collectors (HHDCs) applying for Protocol

Not sure where to start?

We suggest reading the following sections:

- Have 5 minutes? Read section 1
- Have 15 minutes? Read sections 1, 4, 5 and 6
- Have 30 minutes? Read all sections
- Have longer? Read all sections and the annexes and attachments

[2] https://www.elexon.co.uk/guidance-note/cop-compliance-protocol-approvals/
[3] BSCP601: Metering Protocol Approval and Compliance Testing
[4] the BSC Panel has delegated responsibility for BSCP601 to its BSC Panel Committees, the Supplier Volume Allocation Group and the Imbalance Settlement Group
[5] https://www.elexon.co.uk/news-events/subscriptions/

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Approvals for new Meters that have been installed that they may not have a Protocol Approval for.

Implementation

CP1587 is proposed for implementation on 29 February 2024 as part of the standard February 2024 release.

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2. Why Change?

What is the issue?

There are types of Meter/Outstation that are no longer manufactured and are 'unsupported' by the Meter/Outstation manufacturer. The BSC does not currently set out which Meter/Outstation Types are currently manufactured and whether supported or not in the Code of Practice (CoP) Compliance Protocol Approvals list.

There is also no process in BSCP601[6] for Elexon to check with Meter/Outstation manufacturers whether an approved Meter/Outstation Type is manufactured and supported, and where not manufactured or supported take any action to prevent continued installation of the relevant Meter/Outstation Type.

There is a risk to Settlement where Meters/Outstations are installed, or continued to be left in service, where they are no longer supported or spares are unavailable. An example of this risk would be where a Meter/Outstation becomes faulty with no replacement available and, for a rack mounted metering panel it can take significant time to replace the entire metering panel, the circuit is reliant on one Meter/Outstation which is of a similar age to the faulty Meter/Outstation until the metering panel can be replaced. There have been examples where the remaining Meter/Outstation has gone faulty and data needs to be estimated.

The same issue applies to Data Collectors where they can no longer support a protocol for a particular Meter/Outstation Type or wish to withdraw from the market. The BSC does not currently set out which Data Collectors can support a particular Meter/Outstation Type at a specific point in time, only that they have achieved protocol approval at some point, which is in the CoP Compliance Protocol Approvals list.

There is also no process in BSCP601 for Elexon to remove a Data Collector from the approved list where they inform Elexon that they can no longer support a particular Meter/Outstation Type or are exiting the market. In this scenario there is a risk of erroneous appointments of a Data Collector that does not have a compliant protocol.

Since CP1174[7] was implemented in June 2007, if compliance testing or protocol approval testing is successful, Elexon can issue a Certificate of Compliance or Protocol Approval to an applicant. Prior to June 2007 Elexon had to seek a decision from the relevant BSC Panel Committee before issuing Certificates of Compliance or Protocol Approval to an applicant. There is an administrative burden placed on Elexon in producing a paper for the relevant BSC Panel Committee. Elexon still has an obligation under BSCP601 to notify the Panel[8], via a paper, of certificates issued and updates to the Compliance Approval and Protocol Approval list. BSCP601 also places an obligation on Elexon to notify Parties and Party Agents of new approvals. Elexon does this via a Newscast article.

Background

The metering CoPs detail the technical requirements for Metering Systems. This includes a requirement that the Outstation data shall be to a format and protocol approved by the Panel in accordance with BSCP601. The BSCP601 process is defined to ensure that Metering Equipment and Asset Metering Equipment is designed and manufactured to the requirements of the relevant CoP. Each Compliance Approval is specific to that Metering Equipment, or Asset Metering Equipment, tested including type reference and any firmware

[6] BSCP601: Metering Protocol Approval and Compliance Testing
[7] CP1174: Changes to BSCP601 and Compliance Test Specification
[8] the BSC Panel has delegated responsibility for BSCP601 to its BSC Panel Committees, the Supplier Volume Allocation Group and the Imbalance Settlement Group

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and software versions. Metering Equipment and Asset Metering Equipment firmware and software updates not affecting Compliance need not be re-approved.

The Issue 93 'Review of the BSC metering Codes of Practice'[9] Workgroup discussed an aspect with the intent of defining a process to deal with Obsolete Metering Equipment in BSCP601.

The Workgroup highlighted the need for this requirement to trigger a recognition of a higher risk of failure at end of life and potentially a non-compliance. The exact mechanism for initiating Metering Equipment change was not determined. The Workgroup agreed that at the lower end of the market, Meters are a consumable item and can promptly be replaced on failure. In the higher volume Supplier Volume Allocation (SVA) and Central Volume Allocation (CVA) market, changing Metering Equipment can result in long replacement lead times. Using Metering Equipment that is no longer manufactured and supported poses a risk to Settlement where the product is reaching end of life and replacing an entire metering panel to use Metering Equipment from a different manufacturer can take up to six months to complete the works.

The conclusion from the Issue 93 workgroup provided the following recommendations that were noted and agreed by the workgroup:

- Process to be added to BSCP601 to check and confirm (yearly) where a manufacturer has stopped supporting a Meter Type;
- Process to be added to BSCP601 to withdraw a Certificate of Compliance for unsupported Meter/Outstations Types;
- Process to be added to BSCP601 to withdraw Protocol Approval where a Data Collector no longer can support an approved Protocol;
- Process to be added to give a transition period to remove unsupported Meter/Outstation Types; and
- Raise a Metering Dispensation to allow unsupported Meter/Outstation Types to be installed where a fault occurs and the Meter/Outstation type is still in the transition period for removal.

The recommendations were presented to, and noted by, the BSC Panel on 8 September 2022 (330/08)[10].

In addition, Elexon proposes to remove the requirement to present an information paper to the Supplier Volume Allocation Group and the Imbalance Settlement Group. This was raised at the Panel sub-committee meetings of 6 June 2023 (SVG/268 and ISG/266) and the committees were agreeable to remove the requirement for an information paper and to propose a more efficient method of notification.

[9] Issue 93 'Review of the BSC metering Codes of Practice'
[10] BSC Panel 330/08

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3. Solution

Proposed solution

CP1587 seeks to amend sections 1.1 (Scope and Purpose of the Procedure), 1.2 (Main Users of Procedure and their Responsibilities) and 1.3 (Use of the Procedure) of BSCP601 to define the new process and obligations on stakeholders.

CP1587 will also remove the obligation to notify the Panel sub-Committees, via an information paper, of certificates issued and updates to Compliance and Protocol Approval list in sections 2 ‘Interface and Timetable Information’ for parts 2.1, 2.2 and 2.3 and rely on the weekly Newscast to inform industry of new, or updates to existing, Compliance and Protocol Approvals. The obligation to produce a paper where an issue has been identified with a Compliance or Protocol Approval will remain in section 2.4.

CP1587 will also add processes (2.5 and 2.6) in section 2 ‘Interface and Timetable Information’ to confirm whether Meter/Outstation Types are still manufactured and/or supported, and where confirmation that a Data Collector can no longer support a protocol, to notify Parties and Party Agents. In the case of unsupported Meter/Outstation Types give a transition period to remove unsupported Meter/Outstation Types.

Should CP1587 be approved Elexon will raise a Metering Dispensation to allow unsupported Meter/Outstation Types to be installed where a fault occurs and the Meter/Outstation Type is still in the transition period for removal.

Proposer’s rationale

CP1587 will provide a process to confirm whether Meter/Outstation Types are still manufactured and supported. It will also provide a transition period to remove unsupported assets and mitigate the risk to Settlement of faults on Meters/Outstations occurring which prevent actual data being submitted into Settlement. CP1587 will establish a process to remove Data Collectors who can no longer support a protocol for a particular Meter/Outstation Type which will reduce erroneous appointments to Data Collectors who cannot support a particular Meter/Outstation Type.

Additionally, CP1587 will reduce the administrative burden on Elexon preparing and presenting a committee information paper where there is already a more effective means, via Newscast, to inform industry of Compliance and Protocol Approval updates.

Proposed redlining

The proposed redlined changes to BSCP601 can be found in Attachment B.

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4. Impacts and Costs

BSC Party & Party Agent impacts and costs

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Distribution System Operators (DSO) Generators Suppliers Meter Operators Meter Operator Agents (MOAs) CVA MOAs HHMOAs	This will have an impact on all parties who install Meters and who own the Meters. CP1587 aims to prevent unsupported Meters being installed and will allow owners/managers of the Meters a transition period to change their unsupported Meters/Outstations. When a fault occurs with a Meter during the transition period the Metering Dispensation Elexon will raise will allow a like-for-like replacement where the entire Metering System cannot be easily replaced (e.g. a rack mounted Metering System).

Note, this may specifically impact on Metering Dispensation D/565 for the Prometer R/W Meter types and potentially the Honeywell/Elster A1700 and A1140 Meter types.

Central impacts and costs

Central impacts

CP1587 is limited to BSCP601 with no anticipated System Impacts.

Central Impacts	
Document Impacts	System Impacts
• BSCP601	• NA

Impact on BSC Settlement Risks

Impact on BSC Settlement Risks
CP1587 should mitigate risk to Settlement as it will provide a transition period to remove unsupported assets.

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Impact on Market-wide Half Hourly Settlement (MHHS)

Impact on MHHS
There are no anticipated impacts on MHHS.

Central costs

The central implementation costs for CP1587 will be <£2k for BSCCo.

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5. Implementation Approach

Recommended Implementation Date

CP1587 is recommended to be implemented as soon as possible. As this is a document only change to BSCP601, the implementation date of 29 February 2024 as part of February 2024 release is recommended.

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6. Initial Committee Views

ISG's initial views

At its meeting on 7 November 2023 (271/05[11]) the ISG was invited to note the progression of the CP and provide any comments or additional questions for inclusion in the CP Consultation.

The ISG did not form a quorate committee and was therefore unable to meet to consider CP1587. As the purpose of the presentation was for information only (no decision required), this CP will continue to the consultation phase. Members have been invited to give their views on the CP1587 via email and any late feedback can be considered at their January meeting, when the ISG will be invited to come to a decision on CP1587.

SVG's initial views

At its meeting on 7 November 2023 (273/04[12]) the SVG was invited to note the progression of the CP and provide any comments or additional questions for inclusion in the CP Consultation.

The SVG made no further comments nor suggested any additional consultation questions.

[11] https://www.elexon.co.uk/meeting/isg271/
[12] https://www.elexon.co.uk/meeting/svg273/

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7. Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment C.

Summary of CP1587 Consultation Responses				
Question	Yes	No	Neutral/No Comment	Other
Do you agree with the CP1587 proposed solution?	3	1	0	0
Do you agree that the draft redlining delivers the intent of CP1587?	4	0	0	0
Will CP1587 impact your organisation?	3	1	0	0
Will your organisation incur any costs in implementing CP1587?	2	2	0	0
Do you agree with the proposed implementation approach for CP1587?	3	1	0	0
Do you have any further comments on CP1587?	3	1	0	0

Proposed solution and implementation approach

Three out of the four respondents agreed with the proposed solution and implementation approach.

One respondent disagreed with the proposed solution and implementation approach. They stated that the process for Supplier Guidance is missing. Elexon considered this feedback and note the purpose of CP1587 is to ensure responsible metering parties/agents inform relevant Parties including BSCCo if the meter becomes obsolete. It is not envisaged that Suppliers would be impacted as the onus is on parties/agents who are responsible for the meters to replace any meters that become obsolete.

There were no suggested amendments from respondents to the proposed redlining for BSCP601, therefore the proposed redlining has remained unchanged.

Impacts and costs

Impacts			
High	**Medium**	**Low**	**None**
0	1	2	1

One respondent noted a Medium impact to their organisation, they stated that if the exposure were to happen then it could leave a large volume of meter types unsupported –

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they stated that they expect the transition period to be within the certified lifetime of the meter. Elexon has taken this feedback on board and notes that the transition period for replacing obsolete meters would be considered on a case by case basis.

Two respondents stated a Low impact, with one noting that as a Supplier, they would need to ensure their agents comply with the new requirements. The other stated a Low, but positive, impact would be brought by implementing CP1587.

One respondent noted no impacts to their organisation.

Costs			
High	**Medium**	**Low**	**None**
0	1	1	2

Similarly to the impacts, one respondent stated that there could be a Medium cost incurred if there were to be a large volume of meter types unsupported.

One respondent stated costs would be Low because as a Supplier, they would incur costs for their agents changing the obsolete metering equipment.

Two respondents stated there would be no costs incurred from CP1587.

Additional comments

Three of the respondents had additional comments to CP1587. These have been outlined in the table below along with Elexon's response.

Additional comments	Elexon response
1. One sought further clarity on transition periods should a mass meter manufacturer exit the market as this could leave a large volume of meter types unsupported. They proposed that the transition period would be within the certified life of the meter.	Elexon considered this feedback and notes that in the redlining, the transition period would be considered on a case by case basis, therefore the transition period may vary for each case.
2. One sought clarity on whether the scope is to be extended to cover unsupported meters with integral outstations.	Elexon can confirm CP1587 includes unsupported meters with integral outstations.
3. One respondent stated whole process for supplier guidance is missing. They noted CP1587 only includes the processes and timescales that BSCCo, applicants and Party Agents have to follow, but not those required for other parties, including Suppliers.	As mentioned above it is not envisaged that Suppliers would be impacted as the onus is on parties/agents who install or are responsible for the Meters to replace any Meters that become obsolete. As per 2.5.4 in the redlining for BSCP601, Parties and Party Agents would be notified on the detail the issue and the transition plan.

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Summary and recommendations

Overall, the majority of respondents agree with proposed solution and proposed implementation. All respondents agree that the redlining delivers the intent of CP1587.

We therefore recommend that CP1587 be implemented with the proposed redlined changes to BSCP601.

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8. Recommendations

We invite the **Committees** to:

- **APPROVE** the proposed changes to BSCP601 for CP1587;
- **APPROVE** CP1587 for implementation on 29 February 2024 as part of the standard February 2024 release; and
- **NOTE** that CP1587 will be presented for decision to the;
    - SVG and ISG on 9 January 2023.

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