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CP Consultation Responses

CP1587 ‘Obsolete Metering Equipment’

This CP Consultation was issued on 13 November 2023 as part of the November 2023 CPC Batch, with responses invited by 8 December 2023.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Scottish Power (Dataserve)	1	Supplier Agent
Siemens	1	Supplier Agent
SSE Energy Supply Limited	1	Supplier
Stark	1	Supplier Agent

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Summary of Consultation Responses

Respondent	Agree?	Impacted ?	Costs?	Impl. Date?
Scottish Power (Dataserve)	✓	✓	✓	✓
Siemens	✓	✓	✖	✓
SSE Energy Supply Limited	✖	✓	✓	-
Stark	✓	✖	✖	✓

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Question 1: Do you agree with the CP1587 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
3	1	0	0

Responses

Respondent	Response	Rationale
Scottish Power (Dataserve)	Yes	We understand the rationale for tis change, in particular in regards to high consuming meter types.
Siemens	Yes	-
SSE Energy Supply Limited	No	Whilst we agree with the proposed solution from an agent point of view, there is no guidance in the solution for suppliers on how to manage the exchanges, including timescales, etc, to ensure that their agents have replaced the obsolete or unsupported equipment in a suitable timeframe.
Stark	Yes	-

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Question 2: Do you agree that the draft redlining delivers the CP1587 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
Scottish Power (Dataserve)	Yes	-
Siemens	Yes	-
SSE Energy Supply Limited	Yes	As the CP is currently written it does deliver the proposed solution.
Stark	Yes	-

NB there were suggested amendments to the CP Redlined Text

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Question 3: Will CP1587 impact your organisation?

Summary

High	Medium	Low	None
0	1	2	1

Responses

Respondent	Response	Rationale
Scottish Power (Dataserve)	Medium	Please see response to Q6
Siemens	Low	Low impact, but we believe this is a positive impact.
SSE Energy Supply Limited	Low	As a supplier we will need to ensure that our agents comply with the new requirements.
Stark	None	-

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Question 4: Will your organisation incur any costs in implementing CP1587?

Summary

High	Medium	Low	None
0	1	1	2

Responses

Respondent	Response	Rationale
Scottish Power (Dataserve)	Medium	Please see response to Q6
Siemens	None	-
SSE Energy Supply Limited	Low	As a supplier we will incur costs for our agents changing obsolete metering equipment.
Stark	None	-

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Question 5: Do you agree with the proposed implementation approach for CP1587?

Summary

Yes	No	Neutral/No Comment	Other
3	1	0	0

Responses

Respondent	Response	Rationale
Scottish Power (Dataserve)	Yes	-
Siemens	Yes	-
SSE Energy Supply Limited	No	Please see our responses to questions 1 and 6. We believe the CP needs to be amended to provide guidance for suppliers.
Stark	Yes	-

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Question 6: Do you have any further comments on CP1587?

Summary

Yes	No
3	1

Responses

Respondent	Response	Comments
Scottish Power (Dataserve)	Yes	Regarding transition periods we would appreciate further clarification of the risk if a mass meter manufacturer should exit the market. If this exposure were to happen, then this could leave a large volume of meter types unsupported. In this case we would expect that the transition period would be within the certified life of the meter.
Siemens	Yes	This CP seems to be based on obsolete outstations. Will the scope be extended to also cover unsupported meters with integral outstations?
SSE Energy Supply Limited	Yes	Following on from our response to question 1, the whole process for supplier guidance is missing. The CP only includes the processes and timescales that BSCCo, applicants and party agents have to follow, but not those required for other parties, including suppliers
Stark	No	-

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