

CP1505 'Allowing 'off site' Commissioning of Current Transformers (CTs) preinstalled in cut outs or switchgear at manufacture for use in Low Voltage (LV) installations'

This Request For Information (RFI) was issued on 16 July 2018, with responses invited by 24 July 2018.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
SSE Energy Supply Ltd SSE Electricity Ltd	2	Supplier, Supplier Agent: NHH MO
GTC	1	Distributor
ESP Electricity Ltd & IPNL	1	Distributor
E.ON UK	1	Supplier, Supplier Agent: MOA
SP Distribution SP Manweb	1	Distributor
Association of Meter Operators	1	Trade association representing Meter Operators
Northern Powergrid	1	Distributor
Siemens Managed Services	1	Supplier Agent: MOA
Western Power Distribution	1	Distributor

Summary of Consultation Responses

Respondent	Exacerbate?	View changed?	Approved?
SSE Energy Supply Ltd	✓	✗	-
SSE Electricity Ltd			
GTC	✗	✗	✓
ESP Electricity Ltd & IPNL	✗	✗	-
E.ON UK	✓	-	✗
SP Distribution SP Manweb	✓	-	-
Association of Meter Operators	✓	-	-
Northern Powergrid	✗	✗	-
Siemens Managed Services	✗	✗	-
Western Power Distribution	✗	✗	-

Question 1: Do you believe that CP1505 will exacerbate the accountability issue?

Summary

Yes	No	Neutral/No Comment	Other
4	5	-	-

Responses

Respondent	Response	Rationale
SSE Energy Supply Ltd SSE Electricity Ltd	Yes	<p>We believe that CP1505 will exacerbate the accountability issue. As per our consultation response to CP1505, we believe the change may introduce further ambiguity around how parties interpret their responsibilities in commissioning under CoP4. We also argued that to allow 'off site' commissioning by manufacturers would introduce unnecessary extra risks of discrepancies in the testing process, and therefore also increase potential risk to Settlement.</p> <p>We are pleased that ISG has recognised the ambiguity that already exists around accountability relating to ICPs. We continue to have concerns with regards to the responsibilities in CoP4 where the measurement transformers are not owned by a BSC Party, particularly in the case of connection installation by an ICP, and the additional onus then falls the MOA and the Registrant. If 'off site' commissioning of CTs as per CP1505 were to be allowed, the Registrant (via their appointed MOA) may not find out if there was anything wrong (i.e. a fault that had occurred in transit after 'off site' commissioning) until much later, due to the potential length of time it takes for the DNO to adopt the ICP connection arrangements and provide commissioning records. In this way CP1505 exacerbates the accountability issue because 'off-site' commissioning could increase risk of discrepancies in testing that would then remain unknown about and/or unresolved for longer due to lack of ownership to resolve due to unclear accountability under CoP4.</p> <p>We note that ELEXON has not provided much time for Parties to provide their responses to this RFI, allowing less than seven working days between sending the RFI on the afternoon of 16th July and requiring responses by 24th July. This is despite the agreement being made several weeks previously at</p>

Respondent	Response	Rationale
		ISG on 19th June that additional commentary would be sought from Parties on this matter. The short lead time for responses and the time of year (with Summer holidays/ end of school terms) may mean some respondents have not had adequate opportunity to respond to this RFI.
GTC on behalf of ENC & IPNL	No	This modification will improve the records that are available to the DNO party and will ensure a consistent and higher quality record. The timing for making this available could also be quicker as the record can be sourced directly from the manufacturer and will be available on the same day as the equipment is energised. We also believe that this modification will ensure that any work undertaken by a non BSC party will be available both to the DNO and any other BSC party that require the records.
ESP Electricity Ltd & IPNL	No	<p>A change in accountability does not form part of this change proposal and is therefore out of scope.</p> <p>ESP Electricity is of the opinion that when commissioning testing is carried out by third parties e.g. manufacturers and independent connection providers (ICPs), the commissioning requirements of COP4 are maintained and supported by the commissioning party's adherence to industry standards e.g. CE, BSEN 60529, IEC 60044-1, BS 7626 etc. Commissioning Test Certificates are held on record as evidence of successful commissioning.</p> <p>Under COP4, where the current transformers are not owned by a BSC Party, the accountability ultimately lies with the Registrant at meter install stage (via its appointed MOA).</p> <p>The Registrant and the MOA have no commercial relationship with the manufacturers or ICPs. The commercial relationship between the commissioning agent, the ICP and the LDSO would support the investigation and rectification of any issues.</p>
E.ON UK	Yes	Offsite commissioning would not pick any 'in transit' damage that could be caused to the CT's such as broken internal coils. We also feel that any degradation between the time of testing and the time of installation would not be detected, if for example there was a long lead time between off site testing and install of the CT's, tests could then fall outside of the set limits of class accuracy as

Respondent	Response	Rationale
		<p>determined by meter CoP</p> <p>We also feel that offsite testing does not accurately capture the entire metering systems true accuracy as this can only be determined once the entire metering system has been installed and commissioned through the described tests processes detailed by meter CoP. This also has potential to result in inaccurate information being exchanged between parties that suggests accurate commissioning that is not factual which could go unnoticed through a number of supplier's post November 2018, as the meter commissioning dataflows would not suggest meters are commissioned by offsite but still fall outside the allowed limits of accuracy by CT class.</p> <p>It is plausible that any error could result in inaccurate data entering settlement for prolonged periods of time as our Meter operators would not be able access and test the primary side of the transformers whilst on site without significant difficulty. This generally requires both LDSO and MOA expertise on site, and has a cost as well as disruption to our customers as the remedial testing involves taking customers off supply & strip down the metering system to test primary side of the transformers.</p> <p>We feel that there are already existing issues around the requirements for obtaining accurate commissioning testing that need to be addressed where the LDSO does not own and/or are responsible of CT commissioning (ICPs/BNOs) and making allowances for off-site commissioning testing has high potential to exacerbate this situation further.</p>
SP Distribution SP Manweb	Yes	<p>We believe that the full issues surrounding the P283 process have never been fully resolved given that it is not possible for the BSC obligations to be applied to non-BSC parties. Under CP1505 it will be possible for non-BSC parties to source and install measurement transformers with appropriate ratios built in and currently under the BSC it is the responsibility of the MOA and Registrant to commission both the measurement transformers along with the metering equipment to ensure that the metering system is fully compliant with the requirements of CoP4. It is recognised that at any stage in this process there will be no commercial relationship between the relevant parties given that</p>

Respondent	Response	Rationale
		<p>the non-BSC party will very likely be working to a customer request. Therefore, the lack of such a relationship must exacerbate any accountability issues.</p>
<p>Association of MOA</p>	<p>Yes</p>	<p>The obligation on ICP connections is outside of the BSC. There is no role defined in the BSC of an ICP. Therefore any activity that the LDSO relies on to be performed by an ICP is the obligation of the LDSO within the BSC. The BSC places obligations on the LDSO (whether a DNO or an IDNO) to commission the measurement transformers where they are responsibly for them. If the ICP does this on behalf of the LDSO that is up to the parties to agree, but that arrangement is outside of the BSC.</p> <p>The LDSO adopts the BSC responsibility for the measurement transformers and the relevant network connections at the moment of energisation of the network at the connection to the LDSOs network. The LDSO should therefore [logically] satisfy themselves that the measurement transformers are commissioned before (or at the time of) energisation of the network equipment. Once the new [ICP] equipment is physical connected to the LDSOs network it forms part of the LDSO network as far as the BSC is concerned. There seems to be a view with some LDSOs that they are not responsible for the measurement transformers because they do not 'own' them at the time of connection. The commercial arrangements between the ICP and LDSO are outside of scope of the BSC. This is no different to an LDSO doing a connection to their own LDSO network but having not paid the measurement transformer supplier at the point that the measurement transformers are physically connect to the network – this commercial arrangement is also outside of the scope of the BSC.</p> <p>If there is ongoing ambiguity of the responsibility of measurement transformers then some 250,000 metering systems which account for half of the settlement volume are liable to suffer ongoing errors. Where there is concern about the accuracy or faults with the measurement transformers then it can be expected that the time to resolve faults will be extended while the responsible party (LDSO or someone else) is identified. In many cases it will result in an impasse with the customer saying it is not theirs and the LDSO refusing responsibility. This leaves the Registrant (and Meter Operator) in</p>

Respondent	Response	Rationale
		<p>an impossible situation. It is already causing difficulty during new connections, it will cause continuing difficulties for years to come. I fear it will lead to an approach by LDSOs to say that measurement transformers are not theirs, unless the customer can prove otherwise. This is the approach that many LDSOs have taken with risers and laterals. Of course a customer (or anyone else) will not keep records</p> <p>Underpinning this confusion is the distinction draw in the BSC introduced by P283 by the term "Equipment Owner is a Party" and what was envisaged, at the time, to be the relatively few and infrequent cases of truly customer owned equipment – such as a customer owned 33kV switchgear. To avoid the obligations surrounding commissioning there is now an unintended incentive to avoid commissioning obligations by LDSOs to minimise the ownership of measurement transformers. I regard this as a significant risk to settlement. In reality most Meter Operators do not have the skill, expertise or involvement in the energisation of new connected equipment to attend site to commission measurement transformers. Revisiting this aspect of the P283 changes would be appropriate to remove any potential ambiguity. Making the LDSO responsible for commissioning all measurement transformers would be appropriate. As a LDSO they have commercial (DUoS) and system management interest to ensure the measurement transformers are correctly installed and commissioned. This natural incentive should be sufficient to ensure they wish to ensure measurement transformers are correctly set-up, the focus on P283 may have encouraged LDSOs to avoid the criticism of non-compliance with the P283 scrutiny rather than focusing on the objective of P283 which was to ensure accurate settlement (and DUoS) energy data.</p> <p>Now, although the off-site commissioning has highlighted the concern these are in some ways separate issues. To address ISG concerns I might argue to not approve CP1505 and resolve the ambiguity problems which were introduced by P283. I have long argued for a review of COP4 which has a number of ambiguities which have been highlighted by P283 and the greater commercial focus by all stakeholders taking the view – do I have to do this? If I don't I won't. While I support</p>

Respondent	Response	Rationale
		P283 which has highlighted the weaknesses in commissioning it has revealed further problems that need resolution. There are more effective ways to address some of the concerns than the current COP4. Although offsite testing of equipment is a logical thing to do, as I commented in the AMO response to CP1505 there are other concerns, such as poor installation that could result in the Meter Operator finding further problems, such as no volts where a voltage connection has failed to be made, as the current drafting does not ensure on-site checking of the final installation, of equipment that may have been properly tested as a unit in the factory condition.
Northern Powergrid	No	We acknowledge the MOA concern over commission issues for metering equipment installed by non-BSC parties but this is an existing issue. We agree with ELEXON and CP proposer's response to the concerns offered up by the ISG.
Siemens Managed Services	No	Siemens agree with ELEXON and the Proposer of CP1505 that it does not exacerbate accountability. We also agree that CP1505 will improve the quality of Commissioning tests by allowing them to be completed in a more controlled environment for LV installation, with secure labelling of CT assisting with assurance.
Western Power Distribution	No	WPD understands that this existing concern is due to be explored separately by a forthcoming Issue which has not yet been raised. WPD is of the view that this Issue is the appropriate place to deal with this concern rather than within CP1505 since the concern is outside the scope of this change proposal. WPD remains to be persuaded about this accountability issue for the following reasons. When an ICP installs a connection, the metering transformers are either adopted by the local DNO/iDNO, or become owned by the customer. Adoption takes place upon energisation of the connection. In the case of adoption by the DNO/iDNO - whilst there is no commercial relationship between the MOA and the ICP, there is such a relationship between the DNO/iDNO (a BSC Party) and the ICP which requires the ICP to pass over asset and commissioning records in a timely and efficient manner. In WPD's case, depending on the type of

Respondent	Response	Rationale
		<p>connection, either the ICP commissions the metering transformers and provides copies of test certificates and test results, or just provide copies of the test certificates, with WPD assuming responsibility for commissioning the metering transformers following adoption (making use of the 16 working day timescale within BSCP 515).</p> <p>In the case of customer ownership - whilst there is no commercial relationship between the MOA and the ICP, there is such a relationship between the Supplier (a BSC Party) and the Customer. The terms and conditions of supply could be used to compel the Customer to pass over asset and commissioning records in a timely and efficient manner, or to provide access for the Supplier's MOA to commission the transformers themselves.</p> <p>WPD believes that CP1505 will improve the quality of Commissioning tests by allowing them to be completed in a more controlled environment for LV installations. Allowing measurement transformers to be Commissioned off-site in a controlled manner offers a greater likelihood that the tests are completed thoroughly and efficiently. We do not see how this exacerbates this accountability issue.</p>

Question 2: If you already responded to the CP1505 consultation, does the ISG's concern alter your previous view on whether CP1505 should be approved?

Summary

Yes	No	Neutral/No Comment	Other
0	6	3	0

Responses

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

Respondent	Response	Rationale
SSE Energy Supply Ltd SSE Electricity Ltd	No	Our previous view was that CP1505 should not be approved, and we continue to hold this view. We would agree that a decision on the CP should be delayed until the forthcoming Issue Group has been formed and discussed the concerns around ICP accountability and the impact of CP1505 further. We also note that the Issue being referenced has still not been formally raised.
GTC on behalf of ENC & IPNL	No	-
ESP Electricity Ltd & IPNL	No	ESP Electricity responded to the previous CP1505 consultation. The change proposal is not altering which Party is accountable, so our previous view that CP1505 should be approved is not altered.
E.ON U.K.	-	N/A
SP Distribution SP Manweb	-	While we recognise that under the BSC the responsibility for commissioning measurement transformers for non-BSC parties lies with the MOA and Registrant, a process we believe to be correct given the lack of Distributor involvement, we also recognise that at present there is a lack of accountability between the parties involved that needs to be resolved and unfortunately we believe it is currently the view that any resolution of this issue could be passed on to the distribution community. Indeed this view has been enhanced by a slide presented by Elexon at their recent Education day re the introduction of new commissioning data flows in November 18. Slide 48 FAQs indicates amongst other points that given a Distributor is very likely to adopt such a site then, subject to agreement, the MOA and Registrant should wait until post adoption before finalising the commissioning process and to

Respondent	Response	Rationale
		<p>obtain the relevant information from the Distributor post adoption, thereby pushing the accountability on to the Distribution company, a position we find totally unacceptable. The BSC is quite clear in that for commissioning in respect of non-BSC parties the full commissioning process is the responsibility of the MOA and Registrant. Therefore in adopting a site we would expect all necessary work including full commissioning to be carried out prior to adoption and the relevant information passed over to us after adoption, which means that the MOA and Registrant continue to have the commissioning responsibility as defined in the BSC for work carried out by non-BSC Parties.</p> <p>In addition it should be noted that there will scenarios where a Distribution company will not adopt such a site and as such will have no responsibility for any equipment on site. Examples of such sites include BNO, Private Networks and Customer owned equipment.</p>
Association of MOA	-	-
Northern Powergrid	No	See answer to Q1.
Siemens Managed Services	No	<p>We do not agree that concern over ICP is valid. Where an ICP connects and it is adopted by an IDNO or DNO there is a requirement from DNOs for CT certificates and P283 part 1 test certificates to be produced as part of the adoption process and copy left onsite. The CT Commission record and CT certificates can be sought from IDNO or DNO.</p> <p>Where the CTs are installed within a BNO network (irrespective of BSC party or not) there should still be an obligation on the MOP as a BSC party to report on the integrity of the system. Test equipment whilst expensive is available and there is no reason why MOPs could not charge for performing a P283 part 1 on BNO networks to recover costs if this is required. The CT certificates may be more difficult to obtain on a BNO but successful passing of a CT proving test and part 2 of COP4 testing would demonstrate compliance.</p> <p>The customer will have a commercial relationship with the ICP and also with a MOP either directly or via the registrant. The customer has an obligation to comply with relevant regulatory obligations with both MOP and registrant so they should be able to</p>

Respondent	Response	Rationale
		<p>source CT certificates and commission records from their ICP and furnish to the registrant and /or MOP if they have been completed. A label would demonstrate that the test has been done offsite – not that dissimilar to a meter certificate.</p> <p>If the customer has sourced CTs via a non BSC party due to either being a BNO or ICP installed and are not in a position to prove via certification of CTs and the CT proving test fails the MOP should not connect the metering to the system.</p>
Western Power Distribution	No	<p>WPD understands that this existing concern is due to be explored separately by a forthcoming Issue which has not yet been raised. WPD is of the view that this Issue is the appropriate place to deal with this concern rather than within CP1505 since the concern is outside the scope of this change proposal.</p>

Question 3: If you did not respond previously to the CP1505 consultation, do you believe that CP1505 should be approved?

Summary

Yes	No	Neutral/No Comment	Other
1	1	7	0

Responses

Respondent	Response	Rationale
SSE Energy Supply Ltd SSE Electricity Ltd	-	Previously responded
GTC on behalf of ENC & IPNL	Yes	Yes this should be approved
ESP Electricity Ltd & IPNL	-	Not applicable – we responded to the previous consultation and believed CP1505 should be approved.
E.ON U.K.	No	<p>We share the ISG’s concerns that offsite testing could be conducted by the asset’s manufacturer who are also not BSC parties which could lead to the installation of CT’s that do not meet the required CT class accuracy required in CoP as they are also not BSC parties.</p> <p>Whilst E.ON understands the logic behind the proposer’s rationale we believe that the relevant LDSO should always ensure that they have carried out their own on-site testing when installing the equipment and their test results to form part of the commissioning records. This is to ensure that consumer disruption is prevented where possible and/or found at the earliest possible opportunity and settlement errors are minimized as assurance to CT connected consumers that their bills are as accurate as possible.</p>
SP Distribution SP Manweb	-	-
Association of MOA	-	-
Northern Powergrid	-	n/a
Siemens Managed Services	-	-

Respondent	Response	Rationale
Western Power Distribution	-	WPD responded previously to the CP1505. Whilst the CP has not addressed all of the points raised by WPD, it is still of the view that CP1505 should be approved.