## **Designation Request Form - BSCP40/07**

**Request Number** 

(mandatory by BSCCo)

**Title of proposed Modification** (Mandatory by originator – please also attach draft Modification Proposal Form, which can be found on the BSC Website and must meet the requirement in Section F2.1.2 of the BSC, and the signed letter from section 4.15)

Half Hourly Settlement and remote communication obligations for CT Advanced Meters

Rationale for Requesting Designation (Mandatory by originator – this must include any information on what other steps, if any, have been taken to have the Code issue or defect addressed)

The draft Modification has been circulated to AMO Members. Although some members are linked to BSC Parties no-one has come forward as a Proposer.

The Modification has also been circulated directly to representatives of a number of Suppliers. None of which have offered to become the Proposer. The feedback from Suppliers has not been negative to the proposal but due to time and work pressures they are unable to justify raising it themselves.

Reasons why Applicant has an interest in the Code/issue (Mandatory by originator – this may include evidence of being materially affected by the issue)

As Meter Operators we have direct interest in assisting the industry stakeholders to meet their licence and BSC obligations. Meter Operators are keen that modern CT metering equipment is installed and operating safely. The recent Covid-19 restrictions on site visit data collection for the largest metering systems within the industry has reinforced the need for clear obligations on provision of remote communications equipment. Lack of remote communications equipment has had a clear detriment to accurate settlement due to the reliance on regular site visit data retrieval. Aligning the BSC and licence obligations reduces ambiguity of responsibility highlighted during provision of remote communications discussion in February 2020 of Modification P332 'Revisions to the Supplier Hub Principle'.

The mandating of settlement under P272 led to a peak of addition work for several hundred thousand metering systems with a rump of 13,500 remaining as Profile Class 5-8 (as of latest <u>Gross Market Share</u> data). This Modification seeks to address a smaller number of metering systems (about 50,000) than P272, some of which are probably also be some of the rump remaining from P272.

Meter Operators are keen to ensure modern and safe CT metering equipment is installed in a timely manner to meet the existing 'all reasonable steps' licence obligations by the end of 2020. Meter Operators are also keen that the obligations on provision of remote communications are clearly and unambiguously aligned between the licence conditions and the BSC to ensure a consistent application across the industry. Meter Operators benefit from mandating HH settlement by regular remote data collection identifying metering/communication faults promptly enabling quicker resolution satisfying the expectation of customers and industry stakeholders. Progressing this issue now, in advanced of the Market Wide HH settlement (MHHS) obligations spreads the workload and de-risks the progression to MHHS. The envisaged MHHS obligations are still subject to the SCR and whether they progress or in what timescale is still undecided.

The <u>Association of Meter Operators</u> (AMO) is a trade association representing metering
companies. The AMO members endorsed the raising of this Modification in Feb 2020.
Additional Details which may support the application (Optional by originator)
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