

CP Consultation Responses



CP1539 'Inclusion of LCCC as an Affected party in Metering Dispensation applications'

This CP Consultation was issued on 7 December 2020 as part of CPC00809, with responses invited by 6 January 2021.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Association of Meter Operators	0/1	Trade Association

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Association of Meter Operators	x	x	x	x

Question 1: Do you agree with the CP1539 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
0	1	0	0

Responses

Respondent	Response	Rationale
Association of Meter Operators	No	It is not clear what BSC objective is better supported by the change. If the requirement is to support the LCCC then it can make a requirement under its own governance.

Question 2: Do you agree that the draft redlining delivers the CP1539 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
0	1	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
Association of Meter Operators	No	It is not clear how the ISG or SVG, in considering a Metering Dispensation request, are able to consider any representation of the impact from the LCCC.

Question 3: Will CP1539 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
0	1	0	0

Responses

Respondent	Response	Rationale
Association of Meter Operators	No	N/A

Question 4: Will your organisation incur any costs in implementing CP1539?

Summary

Yes	No	Neutral/No Comment	Other
0	1	0	0

Responses

Respondent	Response	Rationale
Association of Meter Operators	No	N/A

Question 5: Do you agree with the proposed implementation approach for CP1539?

Summary

Yes	No	Neutral/No Comment	Other
0	1	0	0

Responses

Respondent	Response	Rationale
Association of Meter Operators	No	It is not clear why it is proposed to implement the change outside of the normal BSC release dates

Question 6: Do you have any further comments on CP1539?

Summary

Yes	No
1	0

Responses

Respondent	Response	Comments
Association of Meter Operators	Yes	<p>Ideally the Meter Operator would be involved in preparing the Application and therefore able to substantiate the application. The failure of notifying the relevant Meter Operator can have a material impact on the accuracy of Settlement Data.</p> <p>The proposed change simply requires the LCCC to be advised of the Dispensation Application. It does not give them any ability to comment on the application. It is unclear what benefit the CP brings in terms of the BSC Objectives. The arguments presented in the consultation all seem to refer to impacts on the LCCC activity, not the BSC. If the LCCC is interested in changes to a metering system which may impact from a Meter Dispensation, it is not clear why as that requirement has not been included in the LCCC governance arrangements (EMR Regulations) rather than the BSC. If the intention is that the LCCC should be able to comment or even seek to present arguments against a Metering Dispensation then where are those explained.</p> <p>It is not clear why it is proposed to implement.</p>

CP Redlined Text

BSCP32

Respondent	Location	Comment
Association of Meter Operators	N/A	N/A