# **CP Assessment Report**

# CP1513 'Updates removing inconsistencies within and between BSCP601, CoP3 and CoP5'

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#### **About This Document**

This document is the Change Proposal (CP) Assessment Report for CP1513 which ELEXON will present to the Supplier Volume Allocation Group (SVG) at its meeting on 5 February 2019 and Imbalance Settlement Group (ISG) on 19 February 2019. The SVG and ISG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1513.

There are six 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 SVG and ISG's initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachment A contains the CP1513 Proposal Form
- Attachments B-D contains the proposed redlined changes to deliver the CP1513 solution.
- Attachment E contains the full responses received to the CP Consultation.

## ELEXON



#### Committee

Supplier Volume Allocation Group

#### Recommendation

**Approve** 

#### **Implementation Date**

27 June 2019 (June 2019 BSC Release)



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#### 1 Why Change?

#### **Background**

The Balancing and Settlement Code (BSC) requires Active Energy metered data from Central Volume Allocation (CVA) Metering Systems (MS) to be processed in MWh and Active Energy metered data from Supplier Volume Allocation (SVA) MS to be processed in kWh.

#### **CP1051** 'Review of Metering Code of Practice 2

CP1051 'Review of Metering Code of Practice: 2' was raised to implement several changes to Code of Practice (CoP)2 'The Metering of Circuits with a Rated Capacity not exceeding 100 MVA for Settlement Purposes' and CoP1 'The Metering of Circuits with a Rated Capacity Exceeding 100MVA for Settlement Purposes'. One change was to emphasise that measured quantities and demand values for SVA MS should use kilo (watt), not mega (watt). CoPs 1 and 2 were updated to reflect the kilo/mega differences but, because of the scope of the CP, the kilo/mega changes were not made to CoPs 3 'The Metering of Circuits with a Rated Capacity Not Exceeding 10MVA for Settlement Purpose' and 5 'The Metering of Energy Transfers with a Maximum Demand of up to (and including) 1MW for Settlement Purposes'.

CP1051 also introduced new tests and made changes to existing tests in the CoPs 1 and 2 testing schedules<sup>1</sup> to Balancing and Settlement Code Procedure (BSCP) 601 'Metering Protocol Approval and Compliance Testing'. These required the Compliance Testing Agent (CTA) to confirm whether mega/kilo switching is possible for CoPs 1 or 2 Metering Equipment (ME) only.

#### CP1318 'Minor changes to BSCP601'

CP1318 <u>'Minor changes to BSCP601'</u> added more clarity to several tests in BSCP601 whereby mega values only apply to CoPs 1 and 2.

# BSC Modification P266 'Improving the allocation of Reactive Power flows between Import and Export Metering Systems'

Modification P266 'Improving the allocation of Reactive Power flows between Import and Export Metering Systems' changed CoPs 3 and 5 to clarify that measured quantities and demand values for SVA MS should use kilo values, and measured quantities and demand values for CVA MS should use mega values.

#### What is the issue?

These changes (and others<sup>2</sup>) have resulted in kilowatt/megawatt inconsistencies in BSCP601 and between BSCP601 and CoPs 3 and 5. These inconsistencies could cause

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<sup>&</sup>lt;sup>1</sup> These testing schedules were combined with the testing schedules for CoPs 3 and 5 under CP1067 'Amendments to BSCP601' to produce a generic testing schedule for CoPs 1, 2, 3, and 5. This CP was implemented in the same Release (February 2005). This generic test schedule was then included within BSCP601 itself, by CP1202 'Changes to Meter Protocol Test Specification and the inclusion of BSCP601 appendices', in the February 2008 Release.

<sup>&</sup>lt;sup>2</sup> For example, <u>CP1261</u> which introduced CoP10 'Code of Practice for whole current metering of energy via low voltage circuits for Settlements purposes', and later <u>CP1273</u> which modified CoP10 to accommodate current transformer metering, which modified BSCP601.

confusion for some ME manufacturers with regards to compliance testing, and BSC Parties and Meter Operator Agents (MOAs), regarding compliance with CoPs 3 and 5.

The specific issues are:

#### BSCP601

- Certain tests have the phrase 'Not applicable to CoP10'. However, BSCP601
  paragraph 3.4.4 Note (3) states 'tests referenced to CoPs in italics indicate CoP
  specific tests'. Where a test is applicable to CoPs 1, 2, 3, 5 and 10 no mention is
  made of the CoPs in italics so, if a test is not applicable to CoP10 then the test
  should mention CoPs 1, 2, 3 and 5 in italics;
- Some parts of BSCP601 reference clauses in the CoPs. For consistency within BSCP601 these should be changed to point to the relevant section of BSCP601;
- BSCP601 is incorrect in asserting that test 009 is only applicable to Central Meter Registration Services (CMRS) registered ME, as this test confirms a requirement for SVA registered ME in CoPs 1, 2, 3 and 5;
- BSCP601 is incorrect in asserting that test 010 is only applicable to Supplier Meter Registration Service (SMRS) registered ME, and only CoPs 1, 2, 3 and 5, as this test checks a requirement for CVA registered ME in CoPs 1, 2, 3 and 5 and a requirement for SVA registered ME in CoP10;
- P266 did not amend existing 'mega' to 'kilo' tests (for CoPs 1 and 2) in BSCP601 to ask the CTA to confirm whether 'mega' to 'kilo' switching was possible for ME being tested for compliance against CoPs 3 and 5;

#### CoPs 3 and 5

- Incorrect references as a result of P266. Clause number 4.2.2 in section 5.1.3 (ii) of CoPs 3 and 5 needs to be amended; and
- The sentence 'Where CT test certificates are not available and the CTs can be verified as class 0.5 or better and are installed on an LV installation, the extreme errors for the accuracy class shall be assumed' appears in different clauses of CoPs 3 and 5, which could lead to confusion for BSC Parties and MOAs.

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#### 2 Solution

#### **Proposed solution**

CP1513 proposes to:

- Replace all references to 'Not applicable to CoP10' in BSCP601 to only include the relevant CoPs (e.g. CoPs 1, 2, 3 and 5);
- Amend references to 5.4 and one reference to 5.3 in BSCP601 to point to the relevant sections in BSCP601;
- Amend all the relevant 'mega' to 'kilo' tests (for CoPs 1 and 2) in BSCP601 to include CoPs 3 and 5;
- Change the reference to clause number 4.2.2, in section 5.1.3 (ii) of CoPs 3 and 5, to read 4.3.2; and
- Move the relevant sentence in CoP3 from clause 4.3.2 to clause 5.1.1 to be consistent with CoP5.

#### Proposer's rationale

These changes will align BSCP601 with CoPs 3 and 5. It will make it clear to manufacturers seeking CoPs compliance that ME can be registered in SMRS or CMRS and, as a result, different measured quantities and Demand Values are required for SVA MS and CVA MS. CP1513 will make it clear that the CTA needs to confirm if CoPs 3 and 5 ME is capable of mega/kilo switching. Changing incorrect references in CoPs 3 and 5 and moving the sentence in CoP3 (about missing CT test certificates) to the same clause as CoP5 will provide increased clarity to BSC Parties and MOAs.

#### **Proposed redlining**

The proposed redlining to deliver the CP1513 solution can be found in Attachments B-D.

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#### 3 Impacts and Costs

#### **Central impacts and costs**

#### **Central impacts**

Central Impacts		
Document Impacts	System Impacts	
• BSCP601	None	
• CoP3		
• CoP5		

#### **Central costs**

The central implementation costs for CP1513 will be approximately £480 (two ELEXON Working Days (WDs)) to implement the document only changes.

#### **BSC Party & Party Agent impacts and costs**

#### **Participant impacts**

We anticipate the following positive impacts will result from CP1513. Market participants did not highlight any material impacts that will arise from implementing the CP1513 solution, with responses outlined in section 6 of this paper and in attachment E.

BSC Party & Party Agent Impacts		
BSC Party/Party Agent	Impact	
CVA MOA	Clarifies the requirements in CoP3 regarding use of existing measurement transformers where calibration certificates are missing.	
ННМОА	Clarifies the requirements in CoP3 regarding use of existing measurement transformers where calibration certificates are missing.	

#### **Participant costs**

Market Participant costs would be minimal, as highlighted in Section 6 of this paper.

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## 4 Implementation Approach

#### **Recommended Implementation Date**

CP1513 is proposed for implementation on  $\bf 27$  June  $\bf 2019$  as part of the June 2019 BSC Release.

The June 2019 BSC Release is the next available Release that can include this CP.

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#### **5** Initial Committee Views

#### **ISG's initial views**

CP1513 was presented to the ISG for information and comment on 20 November 2018.

One ISG Member questioned whether the inconsistencies noted within CP1513 could be classed as housekeeping or whether they were classed as material under BSCP40 'Change Management'. ELEXON confirmed that the changes could be construed as material in terms of compliance testing and therefore may have an impact on market participants that should therefore be consulted upon. ELEXON added that it always checks test reports from manufacturers to ensure CoP compliance.

#### **SVG's initial views**

CP1513 was presented to the SVG for information and comment on 4 December 2018.

The SVG did not comment on CP1513, they noted that CP1513 had been raised and noted the progression timetable.

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#### **6** Industry Views

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

Summary of CP1513 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1513 proposed solution?	6	0	0	0
Do you agree that the draft redlining delivers the intent of CP1513?	6	0	0	0
Will CP1513 impact your organisation?	2	4	0	0
Will your organisation incur any costs in implementing CP1513?	1	5	0	0
Do you agree with the proposed implementation approach for CP1513?	6	0	0	0
Do you have any further comments on CP1513?	0	6	0	0

#### **Comments on the CP**

Respondents for the CP1513 Consultation unanimously agreed with the proposed solution, highlighting that it would provide clarity to BSCP601.

The majority of respondents confirmed that there would be no impact on their organisation. One respondent highlighted a minimal impact. A HHMOA noted that the solution to this CP would clarify the requirements in COP3 regarding the use of measurement transformers, where calibration certificates are missing.

One respondent highlighted that the cost for implementation would be minimal, with all other respondents confirming there wouldn't be any implementation cost.

Respondents unanimously agreed with the pragmatic approach to implement the change in the next available BSC Release (June 2019).

#### **Comments on the proposed redlining**

ELEXON received an informal response from one market participant who highlighted an inconsistency between the CP proposed solution and the CoP3 and CoP5 redlining. The market participant highlighted that the solution proposed to align a sentence in CoP3 with a sentence in CoP5. However, the redlining showed the sentence in CoP5 aligned with the sentence in CoP3. We have amended the CP1513 redlining accordingly and will be presenting the updates to the SVG and ISG as part of this CP1513 Assessment Report.

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#### **7** Recommendations

#### We invite you to:

- AGREE the amendments to the proposed redlining for CoP3 and CoP5 for CP1513 made following the CP Consultation;
- APPROVE the proposed changes to BSCP601, CoP3 and CoP5 for CP1513;
- APPROVE CP1513 for implementation on 27 June 2019 as part of the June 2019 Release; and
- **NOTE** that CP1513 will also be presented to the Imbalance Settlement Group (ISG) on 19 February 2019 for decision.

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### Appendix 1: Glossary & References

#### **Acronyms**

Acronyms used in this document are listed in the table below.

Acronyms		
Acronym	Definition	
BSC	Balancing and Settlement Code (Industry Code)	
BSCP	Balancing and Settlement Code Procedure	
CPC	Change Proposal Circular	
CMRS	Central Meter Registration Service	
СоР	Code of Practice	
СТ	Current Transformers	
СТА	Compliance Testing Agent	
CVA	Central Volume Allocation	
НН	Half Hourly	
ННМОА	Half Hourly Meter Operator Agent	
ISG	Imbalance Settlement Group	
kWh	kilowatt-hour	
ME	Metering Equipment	
MOA	Meter Operator Agent	
MS	Metering System	
MWh	megawatt-hour	
SMRS	Supplier Meter Registration Service	
SVA	Supplier Volume Allocation	
SVG	Supplier Volume Allocation Group	

#### **External links**

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	CP1051 'Review of Metering Code of Practice: 2'	https://www.elexon.co.uk/change- proposal/cp1051-review-of-metering- code-of-practice-2/

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External Links		
Page(s)	Description	URL
2	CoP1 'The Metering of Circuits with a Rated Capacity Exceeding 100MVA for Settlement Purposes'	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/codes-of-practice/
2	CP1318 'Minor changes to BSCP601'	https://www.elexon.co.uk/change- proposal/cp1318-minor-changes-to- bscp601/
2	P266 'Improving the allocation of Reactive Power flows between Import and Export Metering Systems'	https://www.elexon.co.uk/mod- proposal/p266-improving-the-allocation- of-reactive-power-flows-between-import- and-export-metering-systems/
2	BSCP601 'Metering Protocol Approval and Compliance Testing'	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps/page/7/
2	CoP3 'The Metering of Circuits with a Rated Capacity not Exceeding 10 MVA for Settlement Purposes'	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/codes-of-practice/
2	CoP5 'The Metering of Energy Transfers with Max Demand of up to (and including) 1MW for Settlement Purposes'	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/codes-of-practice/
2	CP1067 'Amendments to BSCP601'	https://www.elexon.co.uk/change- proposal/cp1067-amendments-to- bscp601/
2	CP1202 'Changes to Meter Protocol Test Specification and the inclusion of BSCP601 appendices'	https://www.elexon.co.uk/change- proposal/cp1202-changes-to-meter- protocol-test-specification-and-the- inclusion-of-bscp601-appendices/
2	CP1261 'Introducing Metering Code of Practice 10 to facilitate smart metering in the Half Hourly (HH) market'	https://www.elexon.co.uk/change- proposal/cp1261-introducing-metering- code-of-practice-10-to-facilitate-smart- metering-in-the-half-hourly-hh-market/
2	CP1273 'Changes to the scope of CoP10 to cover current transformer operated Meters'	https://www.elexon.co.uk/change- proposal/cp1273-changes-to-the-scope- of-cop10-to-cover-current-transformer- operated-meters/

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