

CP Consultation Responses



CP1528 'CoP4 clarification of BSC Party responsibility for Commissioning of measurement transformers that the BSC Party adopts'

This CP Consultation was issued on 10 February 2020 as part of CPC00802, with responses invited by 6 March 2020.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
TMA Data Management Ltd	0/1	Supplier Agent: HHDC, HHDA, NHHDC and NHHDA
BUUK Infrastructure	1/0	Distributor
Siemens Managed Applications & Services	0/1	Supplier Agent: CVAMOA, SVA-HHMOA
IMServ	0/1	Supplier Agent: Meter Operator
SSE Energy Supply Limited	1/0	Supplier
Stark	0/1	Supplier Agent: HHDC/DA NHHDC/DA
Association of Meter Operators	0/1	Trade Body
SMS Energy Service Ltd	0/1	Supplier Agent: HHMOA , NHHMOA
Npower group	1/1	Supplier, Supplier Agent

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
TMA Data Management Ltd	✓	✗	✗	✓
BUUK Infrastructure	✓	✓	✗	✓
Siemens Managed Applications & Services	✓	✗	✗	✓
IMServ	✓	✓	✗	✓
SSE Energy Supply Limited	✓	✓	✗	✓
Stark	✓	✗	✗	✓
Association of Meter Operators	✓	✗	✗	✓
SMS Energy Service Ltd	✓	✓	✗	✓
Npower group	✓	✗	✗	✓

Question 1: Do you agree with the CP1528 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
9	0	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	None provided
BUUK Infrastructure	Yes	None provided
Siemens Managed Applications & Services	Yes	We are supportive of the CP. We believe that it clarifies the situation regarding Meter Equipment installed by non-BSC Party; that the LDSO is responsible for commissioning the VT/CTs when it adopts the site. and the Registrant/Supplier via its MOA is only responsible for commissioning measurement transformers on sites which will never be adopted by the LDSO. We agree that this will in practice only apply to SVA and that for CVA the responsibility will remain with the Registrant.
IMServ	Yes	Yes - We are very pleased to see that CP1528 has been raised and is being progressed. As an independent Meter Operator we don't have ready access to a DNO business or the expertise required to commission current transformer and high voltage transformer installations, this is not a task which a Meter Operator should be obliged to undertake, therefore we believe the proposed changes to CoP4 successfully addresses this long outstanding issue.
SSE Energy Supply Limited	Yes	We agree that the proposed solution will add clarity to CoP4 around the responsibilities under the BSC related to Commissioning where a BSC Party has agreed to adopt equipment.
Stark	Yes	We believe it is encouraging for LDSO to take on the ownership based on the proposed solution –“In practice, if measurement transformers are installed by an ICP (or any other non-BSC Party) and will later be adopted by an LDSO (or any other BSC Party), the responsibility for ensuring Commissioning requirements are met would fall on

Respondent	Response	Rationale
		<p>the LDSO (or any other BSC Party) under the proposed CP1528 solution”.</p> <p>Also believes this would better reflect the practicalities of securing</p> <p>Commissioning records and CT/VT calibration certificates by making use of the commercial relationship that exists between ICPs and LDSOs to ensure that these records are obtained within BSC timescales.</p>
Association of Meter Operators	Yes	Clarifies an aspect that one or more Distribution Parties seemed was unclear with the BSC
SMS Energy Service Ltd	Yes	We agree that the solution delivers the goals set out by the change proposal
Npower group	Yes	We would support the proposed solution providing that the supplier would notify us, when we take over these sites. Can the proposer provide further clarification on the process for suppliers and MOA, as it's not clear from the proposal content.

Question 2: Do you agree that the draft redlining delivers the CP1528 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
9	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
TMA Data Management Ltd	Yes	None provided
BUUK Infrastructure	Yes	None provided
Siemens Managed Applications & Services	Yes	None provided
IMServ	Yes	<p>Regarding Section 5.5 5.5 Commissioning, this contains a paragraph which says:</p> <p><i>Where measurement transformers are not owned by a BSC Party the Registrant, via its appointed MOA, shall be responsible for the Commissioning of all Metering Equipment.</i></p> <p>While we recognise that in many situations the MOA will take responsibility for Commissioning Metering Equipment which is not owned or adopted by a BSCP party, we also believe the task may not always rest exclusively with the MOA.</p> <p>For example, if the MOA doesn't have the technical ability to complete the task then the Registrant, through commercial arrangement may choose to discharge responsibility to another party who is equipped to complete the task, for example a DNO. If we agree this is a valid scenario, then the wording should reflect the prospect that the MOA may not be required to complete commissioning of the metering equipment.</p>
SSE Energy Supply Limited	Yes	None provided
Stark	Yes	None provided

Respondent	Response	Rationale
Association of Meter Operators	Yes	None provided
SMS Energy Service Ltd	Yes	None provided
Npower group	Yes	We have accepted the red lining on the basis that the Supplier (registrant) are willing to advise the MOA once these sites are adopted. That way we can if available and gain access to the CTs accommodate and commission. If not, then it would be up to the MOA once appointed to notify the Supplier regarding the commissioning process.

Question 3: Will CP1528 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
4	5	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	None provided
BUUK Infrastructure	Yes	Yes, as an adopting party. However, this would be minimal as we already implemented a process (in June last year) to address this issue.
Siemens Managed Applications & Services	No	None provided
IMServ	Yes	The impact will be positive in respect to the availability of commissioning records transferred on the D0383.
SSE Energy Supply Limited	Yes	Some business process changes may be required.
Stark	No	This CP mainly impacted on MOP Party Agent so no direct impact on DC/DA.
Association of Meter Operators	No	None provided
SMS Energy Service Ltd	Yes	There will be minimal impact, but the impact will be positive as it clears up the responsibilities of the parties involved.
Npower group	No	None provided

Question 4: Will your organisation incur any costs in implementing CP1528?

Summary

Yes	No	Neutral/No Comment	Other
9	0	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	None provided
BUUK Infrastructure	No	Significant costs are not expected with this change, as we have already implemented a similar process in June 2019.
Siemens Managed Applications & Services	No	None provided
IMServ	No	Other than minor changes to working instructions and training we perceive no other costs.
SSE Energy Supply Limited	No	None provided
Stark	No	None provided
Association of Meter Operators	No	None provided
SMS Energy Service Ltd	No	None provided
Npower group	No	None provided

Question 5: Do you agree with the proposed implementation approach for CP1528?

Summary

Yes	No	Neutral/No Comment	Other
9	0	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	None provided
BUUK Infrastructure	Yes	We are happy with this change overall and believe it is an improvement on the current process.
Siemens Managed Applications & Services	Yes	None provided
IMServ	Yes	Considering that the changes requires no system/software changes for MOA we would be happy for the changes to be included in the June 2020 BSC Release
SSE Energy Supply Limited	Yes	We agree with the propose implementation of the change within the November 2020 release.
Stark	Yes	None provided
Association of Meter Operators	Yes	None provided
SMS Energy Service Ltd	Yes	None provided
Npower group	Yes	With clarification on whether we would be notified by a supplier if we take over the site

Question 6: Do you have any further comments on CP1528?

Summary

Yes	No
1	8

Responses

Respondent	Response	Comments
TMA Data Management Ltd	No	None provided
BUUK Infrastructure	No	None provided
Siemens Managed Applications & Services	No	None provided
IMServ	No	None provided
SSE Energy Supply Limited	Yes	<p>We feel it still could be made more clear and explicit in CoP4 that for adopted SVA Metering Systems it is not a requirement of the Registrant to ensure the equipment is Commissioned, but a requirement of the adopting BSC Party to ensure the Metering System has been commissioned. As per BSCP 515 section 3.3.A.1 SVA Metering Systems can be commissioned by the LDSO 'At the earliest opportunity, but no later than 16 WD after energisation'. We feel that though CP1528 adds clarity, it may still leave this aspect open to misinterpretation by the adopting BSC Party.</p> <p>We also note that CP1528 does not address concerns with regards to BNO (Building Network Operators) Measurement Transformer connections, which will not get adopted, and therefore remain the responsibility of the Registrant to get Commissioned. This issue is still yet to be resolved, and we believe poses a potential risk to Settlements.</p>
Stark	No	None provided
Association of Meter Operators	No	None provided
SMS Energy Service Ltd	No	None provided
Npower group	No	None provided

Code of Practice 4

Respondent	Location	Comment
IMServ	Section 5.5 5.5 Commissioning	CoP4 specificity states that responsibility for Commissioning Metering Equipment which is not owned or adopted by a BSCP party rests with the MOA. We believe the Registrant, through commercial arrangement may choose to discharge responsibility a party who is not the MOA