#### 4. APPENDICES

#### 4.3 CP Form

Change Proposal – BSCP40/02	CP No:
	Version No: (mandatory by BSCCo)

## Title (mandatory by originator)

Altering the Trigger Point and subsequent Timescales for Commissioning SVA CT Operated Metering Systems and issue of Data Flow

# **Description of Problem/Issue** (mandatory by originator)

#### What is the Issue (summary)?

We consider that the trigger points for commissioning and subsequent sending of data flow within <u>BSCP515</u> '<u>Licensed Distribution</u>' and the <u>Retail Energy Code (REC) Metering Operations Schedule</u> are not appropriate for Current Transformer (CT) operated metering systems of all types.

#### Further detail

The LDSO and Meter Operating Agent (MOA) have commissioning responsibilities for both types of supply arrangement. The trigger point for commissioning timescales to begin in the Metering Operations Schedule and BSCP515 (3.3.A) is the date of physical Energisation of the supply. The trigger for the LDSO to send the D0383 'Notification of Commissioning Information' within the same procedures is the completion date of the commissioning. These trigger points are problematic for the following reasons:

- A. The LDSO is often not aware of the Energisation date of a Low Voltage (LV) CT operated fused supply at the time of Energisation as the MOA receives instruction to Energise from the Supplier (independently of the LDSO) and inserts the fuses. Therefore, the LDSO may not be aware of the Energisation until they receive the D0139 'Confirmation or Rejection of Energisation Status Change' from the MOA. This could be up to 5WD after Energisation so could reduce the LDSO's available commissioning time to 11WD;
- B. The MOA is often not aware of the Energisation date of a LV and High Voltage (HV) circuit breaker supply at the time of Energisation as the LDSO receives instruction to Energise from the Supplier (independently of the MOA) and closes the circuit breaker. There will always be a Meter installed prior to Energisation but the MOA may not be aware of the Energisation until they receive the D0139 from the LDSO. This could be up to 5WD after Energisation so could reduce the MOA's available first commission attempt time to 27WD;
- C. For a fused supply, the LDSO may not be aware of who the MOA is to send the commission information to via a D0383 until a D0139 is received. This is often the point at which the LDSO first becomes aware that a fused supply is Energised. This may be several days/weeks/months after LDSO commissioning. Therefore, there will be times where it is impossible for the LDSO to send the D0383 within 5WD of commissioning;

- D. LV CT pre-installed, pre-commissioned metering units are usually commissioned to CoP4 requirements in the factory or workshop. As the trigger to send the D0383 to MOA is the commissioning completion date, it is highly unlikely that the data flow will be sent within 5WD of commissioning as the unit is unlikely to have been installed at that point. Even if the final commissioning checks are carried out during installation and that date is used as the commissioning date, it would still rely on a MOA being appointed at that point, which is often not the case;
- E. Circuit breaker CT operated metering systems may be commissioned by LDSO prior to Energisation by use of injection. Therefore, it is possible to send the D0383 to the MOA within 5WD of commissioning, but prior to Energisation, on the occasions where a MOA has been appointed. However, there are occasions where a MOA has not been appointed within 5WD of commissioning making it impossible for the LDSO to send the D0383 within time limits. In any event, the LDSO will only send the D0383 where the MOA has been formally appointed in SMRS.
- F. The relatively small timeframe of 5WD after commissioning to send the D0383 is proving to be very problematic to many LDSOs due to operational difficulties in transferring the commissioning data from site to the back office in order to populate the D0383. This has resulted in a number of audit non-conformances.

Overall, we consider that the trigger points for commissioning and subsequent sending of data flow within the REC Metering Operations Schedule and BSCP515 are not appropriate for CT operated metering systems of all types.

**Proposed Solution** (mandatory by originator)

# BSCP515 section 3.3.A - New SVA Metering System – Commissioning of Measurement Transformers.

Amend section 3.3.A.1 to include the date of D0139 receipt from MOA as the trigger point for commissioning countdown (where the MOA energises). It splits out the different trigger points for where the LDSO or MOA energises.

Amend 3.3.A.2 to remove the reference to sending the commissioning information no later than 5WD after commissioning (action 3.3.A.1) and replace it with sending it no later than 21WD after Energisation (if LDSO energises) or 21WD after receipt of D0139 if MOA energises. This allows extra time for the LDSO to send the D0383 but retain the existing overall timescale of within 21WD of Energisation (where the LDSO energises); or creates a slight extension to the overall timescales of Commissioning and sending the related Commissioning information by 5WD (to account for the 5WD the MOA has to send the D0139 following Energisation) where a MOA energises the Metering System.

### **Justification for Change** (mandatory by originator)

We believe some of the trigger points for LDSO and MOA actions in the commissioning process of the Metering Operations Schedule and BSCP515 are not suitable. Therefore, this change recommends a change to some of the trigger points.

We consider that the trigger points for the commission process timescales should still be related to the Energisation of the supply, but not the physical Energisation date where the other party energises. We believe the trigger point for commissioning timescales to begin in this scenario should be the receipt date of the D0139. Though it may seem logical to use the D0139 data item J0014 (Date of Action) as the trigger point, this is still problematic as the Date of Action (the date on which the action was performed – Energisation in this case) within the D0139 can be back-dated by several months making it unsuitable. Therefore, we propose to use the date of receipt of the D0139 as the trigger point.

Whilst the current overall timescales for the LDSO to Commission and send Commissioning related information of 21WD from Energisation will be extended slightly to up to 26WD from Energisation (where a MOA energises), this should not pose a significantly greater risk to Settlement for the following reasons:

- a. The timescales for LDSO commissioning are only extended where the MOA energises. This means the Metering Equipment has already been installed, and is in situ, so it is highly likely that the LDSO has already Commissioned the CTs either by using phantom load or by installing a pre-commissioned unit.
- b. In the unlikely event that the LDSO hasn't Commissioned and will need to attend site after Energisation to carry out Commissioning, due to the nature of cut-out/industrial service unit located LV CTs, it is highly likely that the MOA will carry out end to end Commissioning checks anyway as they can usually easily access the primary conductors on these type of installations.

To which section of the Code does the CP relate, and does the CP facilitate the current provisions of the Code? (mandatory by originator)

BSC Section L 'Metering'

**Estimated Implementation Costs** (mandatory by BSCCo)

<£1k

BSC Configurable Items Affected by Proposed Solution(s) (mandatory by originator)

BSCP515 'Licensed Distribution'

Impact on Core Industry Documents or System Operator-Transmission Owner Code (mandatory by originator)

REC

**Related Changes and/or BSC Releases** (mandatory by BSCCo)

None

Requested Implementation Date (mandatory by originator)
3 November 2022 as part the standard November 2022 BSC Release.
<b>Reason:</b> The November 2022 Release is the next available Release which can include this CP. There is not expected to be any significant system updates required by Parties.
Version History (mandatory by BSCCo)
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