ELEXON

CP Consultation Responses

CP1563 'Altering the Trigger Point and subsequent Timescales for Commissioning SVA CT Operated Metering Systems and issue of Data Flow'

This CP Consultation was issued on 13 June 2022 as part of the June 2022 CPC Batch, with responses invited by 8 July 2022.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
EDF	1	Meter Operator
IMServ	1	MOA
SP Energy	1	Distributor
Western Power Distribution	1	Distributor
Northern Power Grid	1	Distributor

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Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
EDF	✓	✓	×	✓
IMServ	✓	✓	✓	✓
SP Energy	✓	✓	✓	✓
Western Power Distribution	✓	✓	✓	✓
Northern Power Grid	✓	✓	*	✓

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Question 1: Do you agree with the CP1563 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5	0	0	0

Responses

Respondent	Response	Rationale
EDF	Yes	Upon further conversation, EDF has updated their response to be in favour of the solution.
IMServ	Yes	We believe the scenarios identified are valid and be don't believe the overall timescales will significantly impact to the process.
SP Energy	Yes	None
Western Power Distribution	Yes	Yes we agree with the changes that have been made to the redlining.
Northern Power Grid	Yes	Some of the text from the version 2 proposal form has not been fully transferred to the version 2 consultation document, for example, in the 'proposer's rationale' section it should say "some* of the trigger points are not suitable" – as the trigger point for LDSO to begin commissioning remains the Energisation of the supply. Also, in the same section it says "The timescales for LDSO commissioning* are only extended where the MOA energises". This isn't quite true as the MOA timescales for commissioning are also slightly extended by 5WD where the LDSO energises (to account for the time to send the D0139) – but this is covered in the REC redlining. There are others. Although it shows a little inconsistency between the proposal document and the consultation, the v2 redlining of BSCP515 is still correct. *Missing words

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Question 2: Do you agree that the draft redlining delivers the CP1563 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5	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
EDF	Yes	It matches the CP1563 proposal
IMServ	Yes	None
SP Energy	Yes	None
Western Power Distribution	Yes	Yes we agree with the changes that have been made to the redlining.
Northern Power Grid	Yes	None

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Question 3: Will CP1563 impact your organisation?

Summary

High	Medium	Low	None
0	2	3	0

Responses

Respondent	Response	Rationale
EDF	Medium	Any delays to commissioning of transformers and issuing of flows to us as MOA can result in delays to identifying sites that have mismatches in commissioning details between the transformers and metering which could result in significant settlement risks.
IMServ	Low	We expect the impact will be minimal
SP Energy	Low	We anticipate that changes will relate to internal processes and reporting
Western Power Distribution	Medium	Process and documentation changes will be required. Systems will require to be checked to align the amended trigger points to any system alerts.
Northern Power Grid	Low	It will require amendments to internal procedures. As stated in the CP consultation, the solution will help reduce the risk of BSCP/REC non-compliance.

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Question 4: Will your organisation incur any costs in implementing CP1563?

Summary

High	Medium	Low	None
0	0	3	2

Responses

Respondent	Response	Rationale
EDF	None	N/A
IMServ	Low	We expect the cost will be minimal, this would be limited to a minor database update, plus some training and changes to procedure documents.
SP Energy	Low	Costs will be one off training, revision of internal documentation and minor system changes
Western Power Distribution	Low	Costs will be incurred for the process and document changes and any possible system alerts that will need amending, however, it is anticipated that these costs will be minimal.
Northern Power Grid	None	Other than the obvious resource time amending procedures.

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Question 5: Do you agree with the proposed implementation approach for CP1563?

Summary

Yes	No	Neutral/No Comment	Other
5	0	0	0

Responses

Respondent	Response	Rationale
EDF	No	Upon further conversation, EDF has updated their response to be in favour of the implementation approach.
IMServ	Yes	No significant issues expected
SP Energy	Yes	None
Western Power Distribution	Yes	We agree with the proposed implementation approach as it aligns with the associated REC R0031 implementation approach
Northern Power Grid	Yes	For the reasons outlined in the consultation document.

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Question 6: Do you have any further comments on CP1563?

Summary

Yes	No
1	4

Responses

Respondent	Response	Comments
EDF	Yes	MOA is concerned that there isn't enough lead time to commission metering for sites that haven't got enough load and would like this addressed and added to the CP so that when there isn't enough load, the trigger for commissioning is only when there is enough load to commission, as per the D0010's from DC to Supplier and Supplier informing MOA by D0384 that there is enough load to commission – making the D0384 from supplier the trigger point for these instances. MOA is concerned that there are no dates outlined from which this CP would be effective; so would want to understand whether the new trigger points would only be for sites with installations from a certain date onwards or if it would be backdated for all metering?
IMServ	No	None
SP Energy	No	None
Western Power Distribution	No	None
Northern Power Grid	No	None

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CP Redlined Text

BSCP515

Respondent	Location	Comment
EDF	None	None
IMServ	None	None
SP Energy	None	None
Western Power Distribution	None	None
Northern Power Grid	None	None

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