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# Metering Dispensation D/565 – Prometer R/W Meter types

**Supplier Volume Allocation Group**

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Summary

**Elexon (BSCCo) has applied for a lifetime, generic Metering Dispensation (D/565) on behalf of SMS plc (SMS). We invite the SVG to approve Metering Dispensation D/565, in relation to CoPs 3, 5, 10 and 11, on a lifetime basis, subject to a condition. We will take a similar decision paper to the Imbalance Settlement Group in relation to CoPs 1, 2 and 3, subject to the same condition.**


## 1. BSC requirements

1.1 Section L[1] of the Balancing and Settlement Code (BSC) requires all Metering Equipment to either:

- comply with the requirements set out in the relevant Code of Practice (CoP) at the time the Metering System is first registered for Settlement under the BSC (L3.2.2); or
- be the subject of, and comply with, a Metering Dispensation (L3.4).

1.2 Where an item of Metering Equipment is changed, and that change is a material change to that item, then the Metering Equipment needs to comply with the prevailing version of the relevant CoP (L3.3). We consider like-for-like replacements of Meters/Outstations as a material change. Changing components of Meters/Outstations could be considered not material.

1.3 Section L allows the Registrant of a Metering System, or, prior to the appointment of a Registrant of a Metering System, BSCCo, to apply for a site specific Metering Dispensation if, for financial or practical reasons, Metering Equipment will not or does not comply with some or all the requirements of a CoP.

1.4 Section L also allows the BSC Panel, any BSC Party, or BSCCo, on behalf of a non-BSC Party, to raise a generic Metering Dispensation. In this case, the BSC Panel (i.e. BSCCo, on its behalf) needs to consult with all BSC Parties.

1.5 The process for applying for a Metering Dispensation is set out in BSCP32[2].

[1] 'Metering'
[2] 'Metering Dispensations'

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## 2. Proving a Meter or Outstation complies with a CoP

2.1 Prior to the implementation of CP1238[3], in the November 2008 BSC Release, the BSC required Registrants to ensure Metering Equipment complied with the relevant version of the applicable CoP. This was difficult to prove for Registrants if a Meter/Outstation type had not been put through BSCP601[4] and a Certificate of Compliance issued to the applicant (normally the Meter/Outstation manufacturer). BSCP601 was an optional procedure at the time. CP1238 added a clause to CoPs 1[5], 2[6], 3[7] and 5[8] that required Meters and Outstations to be put through compliance testing under BSCP601:

"Meters and Outstations referred to in this Code of Practice shall only achieve successful compliance in respect of any testing detailed in this Code of Practice if the requirements set out in accordance with BSCP601 are also observed and successfully completed or a valid Metering Dispensation has been granted covering any departure from the requirements as detailed in this Code of Practice."

2.2 This clause was carried through to CoP10[9] and CoP11[10], when they were developed and then implemented (26 Feb 2009 and 30 June 2022, respectively).

## 3. BSC Baseline Statement

3.1 Under the BSC Baseline Statement, the Imbalance Settlement Group (ISG) is solely responsible for CoPs 1 and 2, and jointly responsible for CoP3, alongside the Supplier Volume Allocation Group (SVG). The SVG is solely responsible for CoPs 5, 10 and 11.

3.2 As this Metering Dispensation relates to Meter/Outstation types that were compliant with older Issues of CoPs 1, 2, 3, 5 or 10, and can comply with the latest Issues of CoPs 1, 2, 3, 5 or 10, including the first Issue of CoP11 (as Asset Metering Types 1, 2, 3 or 4), we will present a similar paper to the ISG, at its meeting on 7 November 2023, in relation to CoPs 1, 2 and 3.

## 4. Background to Metering Dispensation D/565

4.1 **Issue 97 –** On 20 August 2021, Elexon raised Issue 97[11] to review the Meter shortage risk. The Issue Group recommended that Elexon raise two Metering Dispensations to mitigate some of the risks posed to the BSC:

- An 18 months generic Metering Dispensation (D/535) from the new requirements due to be implemented in June 2022 via CP1527[12]. This Metering Dispensation creates a transition period whereby Meter Operator Agents (MOAs) will be able to use up old stock and stock that they may have ordered to the pre CP1527 versions (and Issues) of the relevant CoPs. It also allows MOAs to install Meters compliant with the latest versions (and Issues) of the CoPs, post June 2022, when they become available; and
- An 18 months generic Metering Dispensation (D/536) from the requirement in CoP4 to recalibrate CoP3 and CoP5 Meters. This will reduce the demand for Meters, as MOAs will temporarily not be required to replace the Meter before the maximum period for recalibration is reached.

4.2 D/535 and D/536 are listed on the Statement of Generic Metering Dispensations as temporary Metering Dispensations. D/536 is indeed a temporary Metering Dispensation. D/535, on the other hand, should be listed as a lifetime Metering Dispensation allowing the temporary installation and registration of Meters compliant with the pre-CP1527 Issues of the relevant CoPs, before 30 December 2023. If D/535 was genuinely a temporary Metering Dispensation it would mean those Meters would need to be replaced before it expired. This was not the intention. We recommend the ISG and SVG agree to convert D/535, and another Metering Dispensation, D/544[13] (for class 2.0/A Meters and class 0.5 current transformers), into lifetime Metering Dispensations, subject to temporary installation periods of 18 months (to 30 December 2023).

[3] 'Requirement to mandate compliance testing for Meters and Outstations'
[4] 'Metering Protocol Approval and Compliance Testing'
[5] 'Code of Practice for the metering of circuits with a rated capacity exceeding 100MVA for Settlement Purposes'
[6] 'Code of Practice for the metering of circuits with a rated capacity not exceeding 100MVA for Settlement Purposes'
[7] 'Code of Practice for the metering of circuits with a rated capacity not exceeding 10MVA for Settlement Purposes'
[8] 'Code of Practice for the metering of energy transfers with a Maximum Demand of up to (and including) 1MW for Settlement purposes'
[9] 'Code of Practice for the metering of energy via low voltage circuits for Settlement purposes'
[10] 'Code of Practice for the metering of Balancing Services Assets for Settlement purposes'
[11] 'Meter shortage risk driven by global materials availability and supply chain challenges'
[12] 'Increase the minimum data storage capacity for Settlement Outstations and mandate specific selectable integration periods for Metering Codes of Practice'
[13] CP1553 tightened the requirements for the minimum accuracy class of Meters from class 2/A to class 1/class B, for CoP5. CP1553 also tightened the requirements for the minimum accuracy class of current transformers (CTs) from class 0.5 to class 0.5s, for CoP 3, 5 and 10. Elexon raised D/544 to allow their use until 30 December 2023.

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4.3 **CP1527** - On 30 June 2022, Elexon implemented CP1527. CP1527 changed the requirements for Outstations in CoPs 1, 2, 3, 5 and 10 and increased the Issue numbers of these CoPs by one.

4.4 These are the new requirements for Outstations, due to CP1527:

- Increase the minimum data storage capacity for Settlement Outstations to 90 days per Outstation channel, at 30 minute integration periods, for CoPs 1, 2, 3, 5 and 10.
- Mandate specific, selectable, integration periods for CoPs 3, 5, and 10 (i.e. 30, 20, 15, 10 and 5 minutes) and add a test for this requirement (and for CoPs 1 and 2) into BSCP601. CoPs 1 and 2 already contained this requirement but it was not checked under BSCP601 by the Compliance Testing Agent (CTA).

4.5 P375 introduced CoP11 (Issue 1) on 30 June 2022. Half Hourly Integral Outstation Meters approved under CoPs 1, 2, 3, 5 or 10 can be used as part of a CoP11 Metering System as Asset Metering Types 1, 2, 3 or 4, if approved under the relevant section of BSCP601[14] for compliance testing against CoPs 1, 2, 3, 5 and 10 (i.e. Section 3.4).

- Asset Metering Type 1 is equivalent to CoP1;
- Asset Metering Type 2 is equivalent to CoP2;
- Asset Metering Type 3 is equivalent to CoP3; and
- Asset Metering Type 4 is equivalent to CoP5 or CoP10.

## 5. Metering Dispensation D/565

5.1 SMS PLC (SMS) currently holds a stock of approximately 100 CEWE[15] Prometer R/W[16] Half Hourly Integral Outstation Meters that are unused and available to install. These Meters came into its possession through the purchase of SSE Large Power metering in 2021.

5.2 The Prometer R/W Meters comply with the previous Issues of CoPs 1 , 2 , 3 , 5 and 10 but have not been confirmed as compliant, by the Meter manufacturer, under BSCP601, with the new Issues of CoPs 1, 2, 3, 5 and 10, released on 30 June 2022 (due to CP1527). Generic Metering Dispensation D/535 covers the use of Meter/Outstation types that comply with the previous Issues of these CoPs. With the end of Metering Dispensation D/535, due on 30th December 2023, SMS will find itself with a considerable number of these Meters remaining, estimated at least 75% of current stock. The cost to replace these Meters, with the current Prometer 100, will exceed £90,000.

5.3 The Prometer R/W is technically capable of complying with the updated requirements of the new Issues of the CoPs 1, 2, 3, 5 and 10 (and therefore Asset Metering Types 1, 2, 3 and 4 under CoP11). SMS has spoken to Secure Meters (the Meter manufacturer) who have advised that they are not planning to submit the Meter types for compliance testing under BSCP601, for the new Issues of the CoPs 1, 2, 3, 5 or 10, or CoP11 Issue 1, due to the Prometer 100 being the replacement for the Prometer R/W.

5.4 As shown in the Prometer R/W manual extract (in the application form (Attachment A)), the Prometer R/W Meter types are capable of logging intervals at 1, 2, 5, 10, 15, 20, 30 and 60 minutes and have a data storage capacity of 186 days for six channels and 260 days for four channels, exceeding the minimum requirement of the new Issues of the relevant CoPs.

5.5 SMS currently has a schedule of ongoing works that will use these Meters over the next 15 months, where the remaining Prometer R/W stock will be depleted. SMS has sufficient spare parts to cover upcoming installs and future fault work.

5.6 The Prometer 100 and L+G E650/E850 are currently being on-boarded to be used as the primary Metering Equipment once the Prometer R/W stock is depleted.

5.7 SMS are happy for this Metering Dispensation to be utilised by any company that requires the continued use of existing stocks of Prometer R/W Meters.

[14] 'Metering Protocol Approval and Compliance Testing'
[15] CEWE Instrument AB is owned by Secure Meters.
[16] The Prometer R is the rack mounted variant. The Prometer W is the wall mounted variant.

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## 6. MDRG

6.1 We circulated the Metering Dispensation application to the Metering Dispensation Review Group (MDRG) for comments (Attachment A).

6.2 All four MDRG Members responded. One MDRG Member does not support Metering Dispensation D/565 and three MDRG Members do support Metering Dispensation D/565.

6.3 **MDRG Member 1** does not agree that this Metering Dispensation application should be approved. This MDRG Member gave the following rationale:

- The issue outlined below[17] is a purely commercial item in that the agent has purchased Meters. It is unfortunate that it appears the agent in question has been stranded by the manufacturer with this non-compliant inventory which has not been tested against BSCP601.
- Only meters that have been through the Elexon Meter Types for Compliance Testing under BSCP601 can be used for Settlements.
- Whilst technically they may be ok, this creates a precedence for manufacturers or agents knowingly or unknowingly supply or source non-compliant Meters or not maintain to the continuing standards of BSCP601.
- Should this be approved, it would create a position for Meter Manufacturers, Half Hourly Data Collectors, Advance Data Services, Asset Metering Half Hourly Data Collectors, Meter Operator Agents (MOAs), Virtual Lead Parties who use or inherit their Meters that they could be exposed to challenges as the metering data is not approved for use as they are not BSCP601 compliance tested like all other Meters in circulation, per that governance process.

6.4 Whilst we agree the issue SMS faces is a commercial issue, other MOAs have also come forward, as a result of the generic Metering Dispensation industry consultation, to say they still have stocks of Meters which could comply with the current Issues of the relevant CoPs but they cannot be used up before D/535 expires on 30 December 2023. We agree with the statement that the Prometer R/W is non-compliant but this non-compliance is only that it has not been through BSCP601 to confirm compliance with the new Issues of CoPs 1, 2, 3, 5 and 10.

6.5 It is not strictly true that only Meter/Outstation types that have been through compliance testing can be used for Settlements. As mentioned in Section 2 of this paper, there are Meters and Outstations installed (pre 2008) that have never been through compliance testing under BSCP601, yet are not impacting Settlement (except if they become faulty, which happens with most Meters/Outstations, from time to time). Our legal team has also confirmed it is a valid application of the BSCP32 Metering Dispensation process, to avoid the need to go through BSCP601. Doing so is more appropriate where Meters/Outstations have already been proven to comply with older Issues of the CoPs, through rigorous testing under BSCP601, and all that is required is evidence that these same Meter/Outstation types can comply with the new requirements in the relevant CoP(s). Also, these Meter/Outstation types (and others we propose to add to this Metering Dispensation) have not been modified to try and comply with the new Issues of the relevant CoP(s) therefore, no new risk of non-compliance is being introduced to them.

6.6 By Elexon progressing this Metering Dispensation application, we are not suggesting anyone can start using Meters/Outstations that are non-compliant and then seek Metering Dispensation to use them without going through BSCP601. We would be less likely to support such a Metering Dispensation and the BSC Panel Committees could reject the application, as they consider each application on its own merits and make decisions based on what is presented at the time. We do not believe approving this Metering Dispensation should set any precedence for future applications.

6.7 We agree that participants who use or inherit these Meters could be exposed to challenges but we believe the risk is very low in these cases as these Meter types (and others we propose to add to this Metering Dispensation) have been proven compliant with previous Issues of the relevant CoPs in the past, and normally fill up their memory before overwriting older data anyway, and this will not change by allowing their installation/registration under a Metering Dispensation.

6.8 **MDRG Member 2** supports this Metering Dispensation application on the basis that there will be no impact on Settlement. However, instead of relying on the manufacturer's manual as evidence the Meter/Outstation can support at least 90 days of interval data storage, and be configured with 30, 20, 15, 10 and 5 minute integration periods, this MDRG Member requested that SMS carry out their own testing to support it.

[17] i.e. in the email we sent to MDRG Members asking them to provide their comments on Metering Dispensation D/565.

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6.9 In response, SMS supplied metered data from a live Meter/Outstation showing 104 days can be stored in a Prometer R/W, when programmed with six channels. The applicant even offered, should it be required, to provide evidence to show the Prometer R/W can store even more data.

6.10 With regards to testing different integration periods, we confirmed that CoPs 1 and 2 have always required Meter/Outstations to have 'the facility' to select integration periods other than 30 minutes (i.e. 5, 10, 15 and 20 minutes) but, this was not tested, or confirmed, under BSCP601. CoPs 3, 5 and 10 did not require integration periods other than 30 minutes. We have never required applicants to actually test (accuracy, for example) for other integration periods under BSCP601 nor did we, after CP1527 was approved, ask applicants, who applied under BSCP601 for compliance approval against the latest Issue of CoPs 1, 2, 3, 5 or 10, to confirm other integration periods are accurate, only that they are available. We only added a test under CP1527 to BSCP601 for the CTA to check if the other mandatory integration periods (5, 10, 15, 20 minutes) are available when testing under BSCP601 for CoPs 1, 2, 3, 5 or 10.

6.11 Currently, Meters/Outstations are tested with 30 minute integration periods only. The only test where we permit different integration periods to be used is for testing barrelling of memory (i.e. that oldest (Half Hourly) metered data is overwritten by new metered data).

6.12 If we do move to 15 minute integration periods in the future, it will be a major project and the BSC and CoPs will need to be updated to define Settlement Period and Demand Period and Demand Values (CoPs) in relation to the new period (15 minutes) and we will ask for evidence of accuracy for 15 minute integration periods prior to those changes being implemented, once the changes are agreed. Meters which prove to be inaccurate at 15 minute integration periods may have to be replaced.

6.13 **MDRG Member 3** supports this Metering Dispensation application as they don't think that this will have an impact on Settlement.

6.14 **MDRG Member 4** supports this Metering Dispensation application for the following reasons:

- While not type approved for the new CoP, the Meters were previously acceptable;
- For a standard six channel setup they have been shown to store data for more than 90 days;
- It reduces electronic waste; and that
- With caveats applied, there should be no impact to Settlements.

6.15 This MDRG Member recommends the following caveats are added:

- No more than six channels of data storage are utilised on the Prometer R/W Meters;
- A suitable end date for the Metering Dispensation is determined; and
- Possibly assurance from the affected MOAs that they have robust processes in place to ensure that data is collected locally should there be a communications issue on site that has the potential to cause a loss of tariff data.

6.16 This MDRG Member also noted that the approvals process has long been seen as a lengthy and costly process which is reducing the number of Meters available for use in the UK market, and questioned if this a process that can be optimised? We made some recommendations on how to potentially reduce the costs and timescales for getting Meters/Outstations through the BSCP601 process, including:

- Not retesting a Meter type for accuracy against the relevant Meter standards if the Meter type has already has been through accuracy testing with a suitably Accredited Laboratory or Test House and evidence is provided prior to testing under BSCP601 - this is currently done for CoP10 applications where the Meter is confirmed as conforming to the Measuring Instruments Directive (MID)/Regulations (MIR) and evidence provided. Tests 013 and 014, in Section 3.4.8[18] of BSCP601, are relevant.
- Another suggestion is to reduce the period of testing at full load and cyclic variable load, currently five days and 15 days, respectively, which is used to confirm the accuracy of Half Hourly metered data. Tests 061 to 070, in Section 3.4.15[19] of BSCP601, are relevant; and
- A further suggestion relates to checking for the accuracy of the Outstation clock when not powered, and not being communicated with when powered, for 10 or 20 days[20], noting that this would also require changes to the relevant CoPs. Tests 071 to 075, in Section 3.4.16[21] of BSCP601, are relevant and these relate to clause 5.5.2[22] in CoPs 1, 2, 3, 5 and 10.

[18] 'Accuracy Requirements {5.3}'
[19] 'Data Storage {5.5.1}'
[20] 10 days for CoPs 1 and 2 and 20 days for CoPs 3, 5 and 10.
[21] 'Time Keeping {5.5.2}'
[22] 'Time Keeping'

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6.17 We could raise an Issue Group to discuss the risks associated with the latter two suggestions and then raise a Change Proposal for any suggestions deemed appropriate, versus the risk of impacting Settlement.

6.18 We disagree that no more than six channels should be used for the Prometer R/W. Although the applicant has confirmed that at least 104 days can be stored with six channels programmed (and they could provide evidence that more could be stored), the manufacturer's manual indicates that, even when programmed at eight channels, the Prometer R/W can store 144 days per channel at 30 minute integration periods

6.19 We therefore recommend we make it clear that any of the Meter/Outstation types covered by this Metering Dispensation shall comply with the minimum data storage requirement set out in the current Issue of the relevant CoP for each Settlement channel programmed, bearing in mind the relevant registration requirement for the number of Outstation channels and any non-Settlement registers.

## 7. NETSO

7.1 We circulated the Metering Dispensation application to the National Electricity Transmission System Operator (NETSO) for comments (Attachment A).

7.2 The NETSO had not yet responded at the time of writing this paper. We will provide an update at the meeting.

## 8. Generic Metering Dispensation Consultation with all BSC Parties

8.1 We published a 10 Working Day, generic Metering Dispensation consultation for D/565 on the BSC Website and invited BSC Parties and BSC Party Agents to respond. We received four responses:

- Two respondents (Npower Commercial Gas Limited and EON Energy Solutions Ltd) do not support the generic Metering Dispensation for the same, following, reasons:
  - Only a limited number of (two) Data Collectors are approved to work with this Meter Type. As this Meter is no longer current CoP compliant there would be little interest in further Data Collectors becoming compliant and therefore having these meters installed "on the wall" currently means there is limited choice (competition) for Suppliers and Customers on who to use to provide Data Collection services. This would only be compounded if the remaining (small number) of Meters are installed.
  - Their position is that they do not believe that the Metering Dispensation should be granted (in any form) as there are other Meters that could be installed which are CoP compliant. They also believe that sufficient time to use Meter stocks held was given by the original Metering Dispensation.
  - However, if the Metering Dispensation is to be granted then they would like to see the following very clear restrictions of use in place:
    - Only installed following agreement with the Supplier (not Customer) – This is in line with Supplier Hub principles.
    - Limited to new stock only (not Meters which have been previously installed elsewhere or reconditioned). As only new stock has not had any cost recovery already.
    - Limited to SMS only (to enable them to manage financial risk associated with previous acquisition)
    - Limited to end of 2024 (with no further extension) – SMS indicate in the derogation request that they expect to use up stocks in this period.
- Two respondents (EDF Energy (EDF) and Scottish Power (Dataserve Limited)) support the generic Metering Dispensation application:
  - EDF has stocks[23] of Honeywell/Elster A1700s which the manufacturer confirmed (via email in 2018) can comply with new versions and Issues of CoPs 2, 3 and 5. The Elster A1700 meter supports [the required] selectable integration periods. The A1700 Meter also stores 142 days for 4 channels, and 97 days for 6 channels (manufacturer confirmed). Therefore, EDF doesn't see a risk to Settlements if this Meter is also included in the Metering Dispensation.
  - EDF noted that MOAs can't procure new Honeywell/Elster A1700s[24] or Prometer R/Ws so, why limit the Metering Dispensation?
  - EDF suggests the generic Metering Dispensation is expanded to include the A1700s and suggests that continued use of the legacy Prometer R/Ws and Elster A1700s also offers advantages in situations where there is a faulty Meter which form part of a "multi-drop" communications arrangement. Replacing one Meter variant with a new Meter type can become challenging if they

[23] EDF asked us to keep the number and cost off the website for commercial reasons. EDF confirmed we can share the numbers confidentially with the BSC Panel Committees.
[24] Honeywell pulled out of the Meter market this year.

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don't use the same protocol. For example, if EDF Energy has a faulty Prometer R (rack mounted variant) it would need to replace the sub-rack, which isn't a simple task. EDF keep spare Prometer R Meters for resilience which it could use if it discovers a faulty Meter so, it becomes a simple repair.

- Scottish Power (Dataserve Limited) agrees with the proposal as it believes that that the [Prometer R/W] Meter/Outstation types comply with the latest issues of the relevant CoPs.
- Similarly, Scottish Power (Dataserve Limited) would also like to propose a Metering Dispensation for Honeywell/Elster A1140 and A1700 Meter types registered for Settlement between 31 December 2023 and 30 June 2024. As above, it believes that they also comply with the relevant CoPs and has provided evidence to show that a live A1140 can store more than 90 days when programmed with four channels. It has also confirmed that the A1140 can store 205 days per channel with four channels programmed, which aligns with what the manual says. The A1140 manual also shows it can be programmed with the requisite integration periods for CoP10 Issue 3.
- In addition, it was due to procure the required compliant Meter types for CP1527, however, the manufacturer subsequently announced that they were leaving the market. Scottish Power (Dataserve Limited) now has agreements and orders in place to deliver compliant Meter types but request the Metering Dispensation as it transitions to new Meter suppliers.

8.2 In response to the first two consultation responses, we believe the respondents have selected the Prometer (CEW Outstation Type ID), not the Prometer R/W (CP2 Outstation Type ID) from the CoP Compliance and Protocol Approval list. This is an older Meter/Outstation type and is not relevant to the Metering Dispensation application. The Prometer R/W can be dialled by the Central Data Collection Agent (CDCA) and seven Half Hourly Data Collectors (HHDCs) so, it will not impact the ability of Suppliers to appoint an HHDC.

8.3 We agree with these non-supportive respondents' recommendations that, if this Metering Dispensation is approved, it should be subject to these conditions:

- The Supplier (or Registrant, more generally[25]) should be consulted about installing the Prometer R/W;
- It should apply to new stock only (not stock previously used elsewhere or reconditioned stock); and
- The Metering Dispensation should be limited to the end of 2024.

8.4 However, we do not believe this application should be limited to SMS's stock of Prometer R/Ws or SMS only. Other market participants may also have stock of Prometer R/Ws (EDF appears to indicate this). Also, other market participants have stock of Honeywell/Elster A1700s and A1140s which they believe (and have evidenced) also comply with the latest versions and Issues of the relevant CoPs.

## 9. Elexon's view

9.1 We believe that allowing the Prometer R/W Meter/Outstation types to be installed and registered for Settlement for a temporary period until 30 December 2024, under a Metering Dispensation, from BSCP601, will not put Settlement at risk due to non-compliance with the new Issues of CoPs 1, 2, 3, 5 and 10 (or CoP11, under Asset Metering Types 1, 2, 3 or 4). We believe they can, and do comply, but have simply not been put through the mandated process (BSCP601) to prove this.

9.2 We also believe this Metering Dispensation could be expanding in scope to cover existing stock of Honeywell/Elster A1700s and A1140s, as we believe these Meter/Outstation types can also comply with the new Issues of CoPs 2, 3, and 5 and CoP10, respectively and will not put Settlement at risk due to non-compliance with the new Issues of CoPs 2, 3, 5 or 10 (or CoP11, under Asset Metering Types 2, 3 or 4).

9.3 The only risk that these Meter types may present is if they become faulty and cannot be replaced on a like-for-like basis (a material change), e.g. when the temporary condition attached to this Metering Dispensation expires, or cannot be repaired using spare parts (i.e. a non-material change). Secure has stopped producing the Prometer R/W Meter types and they are no longer supported. Honeywell/Elster has pulled out of the Meter market so is no longer producing, or supporting, the A1700 and A1140 Meter types.

9.4 Under Aspect 16 'Obsolete Metering Equipment, the Issue 93 Working Group has recommended we raise a Change Proposal (CP) to address concerns about Meters/Outstations that are no longer manufactured and/or no longer supported. The CP looks to:

- Add a process to BSCP601 to check and confirm (yearly) where a manufacturer has stopped supporting a Meter type;

[25] In the SVA market, a Supplier registers an SVA Metering System and is therefore also known as the Registrant. In the CVA market the person (company) responsible for registering a CVA Metering System is known as the Registrant.

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- Add a process to BSCP601 to withdraw a Certificate of Compliance for unsupported Meter/Outstations types;
- Add a process BSCP601 to withdraw Protocol Approval where a Data Collector no longer can support an approved Protocol;
- Add a process to give a transition period to remove unsupported Meter/Outstation types; and
- Raise a Metering Dispensation to allow unsupported Meter/Outstation types to be installed where a fault occurs and the Meter/Outstation type is still in the transition period for removal.

9.5 We recommend the ISG (and SVG) consider this change in the context of this Metering Dispensation application.

9.6 We recommend that, if the ISG (and SVG) approve Metering Dispensation D/565, the Metering Dispensation should be able to be used by any Registrant, if it agrees, where the stock is existing new stock and come from any market participant, who has already purchased them, and they cannot be installed and registered for Settlement purposes by 30 December 2023.

## 10. Recommendation

10.1 We invite the SVG to:

a) **APPROVE** Metering Dispensation D/565 against the current Issues of the relevant Codes of Practice (CoPs 3, 5, 10 and 11) for the Prometer R/W, Elster A1700 and Elster A1140 Meter/Outstation types, on a lifetime basis, subject to a condition that:

- The Supplier/Registrant agrees that the relevant Meter/Outstation type can be installed and registered for Settlement;
- The relevant Meter/Outstation type complies with the minimum data storage requirement set out in the current Issue of the relevant CoP for each Settlement channel programmed, bearing in mind the relevant registration requirement for the number of Outstation channels and any non-Settlement registers programmed;
- The relevant Meter/Outstation type can only be installed and registered for Settlement between 31 December 2023 and 30 December 2024; and
- The Metering Dispensation only applies to existing new stock of these Meter/Outstation types (not stock previously used elsewhere or reconditioned stock).

b) **AGREE** to convert D/535 (and D/544) into lifetime Metering Dispensations, subject to a temporary installation period of 18 months (to 30 December 2023).

## Attachment

Attachment A – Metering Dispensation D/565 application

## For more information, please contact:

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