P230 - Enabling Interoperability through the use of CoP10 and CoP5 Metering Report Phase Consultation Responses

Consultation Issued on 13 February 2009 and Returned on 02 March 2009

Representations were received from the following parties

No	Company	No BSC Parties Represented	No Non-Parties Represented
1.	TMA Data Management Ltd	0	4 Party Agents
2.	Good Energy	1	0
3.	Scottish and Southern Energy	6	0
4.	EDF Energy	9	0
5.	Energy Services and Technology Association (ESTA)	7	119
6.	Bglobal Metering Ltd	3	1
7.	SAIC Ltd on behalf of ScottishPower	6	0
8.	British Energy	5	0
9.	E.ON UK Energy Services Limited	0	1

Question 1: Do you agree with the Panel's view that P230 should be approved?

Summary

Yes	No	Neutral/Other
8	1	-

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	P230 will ensure that a minimum standard in metering equipment is used when complying with new Supplier Licence obligations, facilitating the free movements of customers between Suppliers and limiting if not removing all risks of stranded assets. There is no doubt that P230 is required for the good working of the market using new metering technologies.

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Respondent	Response	Rationale
Good Energy	Yes	-
Scottish and Southern Energy	Yes	-
EDF Energy	Yes	We agree with the Panel view that P230 better facilitates objectives c & d.
ESTA	No	See Question 4 response.
Bglobal Metering Ltd	Yes	Bglobal Metering are fully aware of the needs for a competitive market and the responsibilities associated with this. As a leading player in the establishment of AMR metering in the UK electricity market we are also aware of the infrastructure needed to support AMR metering particularly in products which are also the subject of rapidly changing communication, hardware and software technologies. This needs to be the subject of a review between all parties concerned as to how this is going to work in practice. A proper understanding should be established of who is going to pick up the potential extra costs and the associated administration involved in Agent transfers and the new industry dataflows needed to support this properly. An understanding of the potential risks to the current asset funding arrangements currently in place needs to be discussed given the Government mandate and the increased credit risks for funding this. If the commercial risks for funding AMR metering are deemed to be too onerous the capital funding for AMR metering could be harder to raise.
SAIC Ltd on behalf of ScottishPower	Yes	ScottishPower strongly agrees with the Panel's view that P230 should be approved. The Modification rightly seeks to ensure interoperability in the market and as such the modification will ensure this essential requirement. Along with ensuring compliance with the Suppliers' new obligation and ensuring interoperability the Modification will improve data accuracy, ensure the smooth operation of the Change of Supplier process and reduce costs to the industry as a whole.
British Energy	Yes	We agree with the recommendation that P230 better facilitates objectives c & d as set out in the Modification Report.
E.ON UK Energy Services Limited	Yes	-

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Question 2: Do you agree with the Panel's suggested Implementation Date?

Summary

Yes	No	Neutral/Other
7	2	-

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	P230 should be implemented to coincide with the Standard Conditions of the Electricity Supply Licence changes.
Good Energy	Yes	-
Scottish and Southern Energy	Yes	-
EDF Energy	Yes	It makes sense to align the implementation date with the release of CP1273.
ESTA	No	See question 4 response.
Bglobal Metering Ltd	No	Bglobal Metering believe the infrastructure to support what is required could be quite complicated. Simple remote meter reading arrangements using a DR are fairly straightforward but the changeover to other parties, transfer of liabilities, administration of new setups under the current risk/funding structures potentially are not.
SAIC Ltd on behalf of ScottishPower	Yes	ScottishPower agrees with the Panel's implementation date. Though it would be preferable to introduce the Modification on the same date as the License obligation the Group and the Panel have to consider the actual practicalities and the problems the industry currently face. As there is, at time of writing, only one approved COP10 meter available it would not be practical for the Modification to be introduced in April. The later date will allow meter manufacturers to progress COP10 meters through the testing process in time for the June implementation date. Furthermore by stating 1 day after the Authority decision this allows any discussions between the Authority, DECC and the EC to take place prior to the implementation of the Modification.
British Energy	Yes	This seems a pragmatic solution to allow adequate meters to successfully complete the compliance approval process.
E.ON UK Energy Services Limited	Yes	-

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Question 3: Do you agree that the legal text delivers the intention of P230?

Summary

Yes	No	Neutral/Other
7	1	1

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	-
Good Energy	-	-
Scottish and Southern Energy	Yes	-
EDF Energy	Yes	The legal text gives effect to the revised Supply Licence obligations.
ESTA	No	See question 4 response.
Bglobal Metering Ltd	Yes	If the intention is to deliver basic meter readings but neglect the separate contracts in place to manage the assets, SIM card setups, customer own purchase arrangements, meter asset maintenance agreements, data servicing agreements etc. then the legal text is sufficient. However, there are obligations under previously entered agreements for other aspects of the asset and communications service provision which also need to be contractually agreed otherwise further costs to transfer will arise (see Q4).
SAIC Ltd on behalf of ScottishPower	Yes	ScottishPower agrees that the legal text as suggested in this modification delivers the desired objective. The revised text will ensure, by establishing the definition of the license obligation and indicating which COPs can be used to meet the requirement that the legal text delivers the intended result. Furthermore, the text is suitably robust to negate the need for another change to the text as the roll-out is extended to other Profile Classes in the future.
British Energy	Yes	Although it is not absolutely clear why change is required to achieve objective.
E.ON UK Energy Services Limited	Yes	-

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Question 4: Do you have any further comments on P230?

Summary

Yes	No	Neutral/Other
3	6	-

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	-
Good Energy	No	-
Scottish and Southern Energy	No	-
EDF Energy	No	-
ESTA	Yes	The CoP is likely to exclude ESTA members metering equipment which is MID approved and meets all the government requirements for smart metering. Many users have already implemented smart metering systems, and these are likely to incompatible with the CoP. The CoP is still unclear and incomplete in a number of areas, and refers to the BSC to which not everybody is a party. You can only call something a standard if it is stable and accessible - if it is changeable and inaccessible it is not a standard. The CoP does not specify protocols at the relevant scoping level to enhance interoperability – the current proposal is likely to exclude systems rather than include them. The CoP gives no improvement to interoperability. The CoP is controlled by ELEXON, which must be polarised to the benefits of a limited set of stakeholders (e.g. settlements and large suppliers and generators). This will be at the expense of the other stakeholders (customers, system providers, energy consultants, small supplier and generators, government energy saving initiatives). Mandating the CoP will exacerbate this polarisation. Mandating the CoP will deny customers supply, if they do not wish to pay for a smart meter that meets the CoP. It will also effectively set the standard for the definition of a "smart meter" for CRC Display Certificates, etc, which is likely to confuse and restrict the customer, or force him to pay more than what he needs to wants.
Bglobal Metering	Yes	Smart Metering devices have a myriad of programmable set up

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Respondent	Response	Rationale
Ltd		arrangements to suit Customer and Supplier specific needs on top of the basic Settlement arrangements. The definitions of interoperability therefore need to be fully explained otherwise there are potentially going to be contractual legal disputes when changes to Agents take place and the service levels provided by a new Agent do not match the arrangements previously entered into contractually by the previous Customer/Supplier arrangements. This will include web data support and analysis services etc. Do the new Agents understand what the previous obligations were and what they are inheriting? How do the changes to SIM cards previously supplied under one Agents contractual purchasing/servicing arrangements pass to another Agent? Who picks up these administrative charges and costs when the previous Agents requires the SIM card to be returned? There are a range of different SIM cards and service providers depending on the specific location of the meter and the best signal coverage. How do the current meter asset servicing liabilities arrangements transfer? How does a new Agent organisation acquire all the software licenses and version control for different models needed to service and maintain the current AMR meters out there and who funds these costs? Who fixes the Comms faults on an AMR meter if the MOP has inherited a meter they have no servicing experience of or programming software for? There are a wide range of different communication technologies in the marketplace and new communication technologies are being developed to further improve communication speed and reliability. How do you determine at the outset which technology is being used and whether you have support for this? Unlike in the HH market, the NHH market is far more complex in terms of tariff structure support and changes etc. How are these new setups going to be written to the meters and the setups verified with changes of Agent? How do you determine at the outset which COP No the meter is capable of being configured i.e. can the customer move from NHH to HH with the same meter etc.? If there are currently separate pulsed output or data hub devices connected to the meter monitoring Gas, footfall, temperature etc. how are these going to be supported going forward?
SAIC Ltd on behalf of ScottishPower	No	-
British Energy	Yes	It is not absolutely clear why a BSC Modification changing the text of the BSC itself is required to achieve the overall objective of the modification to ensure interoperability.

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Respondent	Response	Rationale
		Similarly, it is not absolutely clear why the proposed change to the text of all the CoPs is required to achieve the overall objective. BSC parties are obligated to use Code of Practice compliant metering, and those Codes of Practice should always be consistent with Supply Licence obligations. Associated changes to BSCP601 are required to achieve the interoperability objective of the proposal. We trust that changes to protocol requirements arising from BSCP601 changes will not result in there being a shortage of CoP1,2,3,6,7 compliant meters, given these were not a subject of the changed licence requirement or the original modification proposal. It would be clearer if the mapping of Codes of Practice to particular metering situations was described in the text of the BSC itself, rather than being obscurely embedded in Codes of Practice themselves. Although modification would be necessary to change the requirements, such change is significant and probably deserves full attention of industry and Ofgem.
E.ON UK Energy Services Limited	No	-

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