

## CP1444 'Extend the timescale of CoP10 Proving Tests until the implementation of P272'



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### About This Document

The purpose of this Change Proposal (CP) Consultation for CP1444 is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of CP1444. The Supplier Volume Allocation Group (SVG) will then consider the consultation responses before making a decision on whether or not to approve CP1444.

There are five parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's initial views on the proposed changes.
- Attachment A contains the CP1444 Proposal Form.
- Attachments B and C contain the proposed redlined changes to deliver the CP1444 solution.
- Attachment D contains the specific questions on which we seek your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish to be considered.



## What is a proving test?

A proving test is undertaken by a Half Hourly Data Collector (HHDC) and a Half Hourly Meter Operator Agent (HHMOA) whenever a Half Hourly (HH) Metering System has been installed or reconfigured. One such instance is when a Metering System changes from a Non Half Hourly (NHH) Measurement Class to a HH Measurement Class.

These tests are carried out to give assurance to the Supplier and the HHDC that information being received from the Metering System by the HHDC and the details received in the D0268 'Half Hourly Meter Technical Details' data flow are all correct. This assurance is necessary as the data is used both to bill the relevant customer and in Settlement.

A proving test generally involves the HHMOA requesting the HHDC to obtain a HH Meter reading for a given Settlement Period from the Metering System. The HHMOA will then compare this reading to the reading it had obtained when it installed or reconfigured the Metering System. A proving test is usually a manual process for both the HHMOA and the HHDC.

## History of the Cop10 proving test exemption

### Why were CoP10 Metering Systems exempt from proving tests?

[Code of Practice \(CoP\) 10 'Metering of Energy via Low Voltage Circuits for Settlement Purposes'](#) was introduced in February 2009 by [CP1261 'Introducing Metering Code of Practice 10 to facilitate smart metering in the HH market'](#). By introducing a lower specification CoP, this CP sought to make it more viable for Suppliers to move from NHH to HH Settlement without incurring significant costs. As part of this, CP1261 removed the need for proving tests for such whole current (WC) Metering Systems, which would not have had to undergo a proving test had they remained NHH.

CoP10 was originally intended to cover WC Meters for use in the HH elective (below 100kW) market. CP1261 envisaged that proving tests would still be required for secondary current transformer (CT) metering under [CoP5 'The Metering of Energy Transfers with Max Demand of up to \(and including\) 1MW for Settlement Purposes'](#). [CP1273 'Changes to the scope of CoP10 to cover current transformer operated Meters'](#) subsequently extended CoP10 to include CT metering in June 2009. However, the exemption from proving tests for CoP10 Metering Systems was not changed as part of CP1273.

### Why was this exemption removed?

The exemption from proving tests for CoP10 Metering Systems was removed in June 2015 by [CP1411 'Remove exemption from Proving Tests for Code of Practice 10 Metering Systems'](#). This CP had been progressed as a result of [P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8'](#), as the CP1411 Proposer felt that the original case for removing barriers to elective HH had changed. They note that a significant number of the CoP10 Meters installed for the mandatory Automatic Meter Reading (AMR) Meter rollout will need to be settled HH under P272, and that these will therefore need to be migrated to HH Settlement by P272's Implementation Date of 1 April 2017. As a result, the CP1411 Proposer felt that proving tests should be applied for all HH Metering Systems, irrespective of whether or not they were mandated to be settled HH.

## What is a Measurement Class?

The Measurement Class of a Metering System reflects how it is settled, e.g. whether it is settled HH or NHH or whether it is metered or unmetered.

There are currently five Measurement classes:

- A: NHH Metered
- B: NHH Unmetered
- C: HH Metered that are 100kW Metering Systems
- D: HH Unmetered
- E: HH Metered that are not 100kW Metering Systems

From 5 November 2015, existing Measurement Class E will be split into three:

- E: HH CT Metering Systems that have site specific DUoS billing and are not 100kW Metering Systems
- F: domestic HH CT and WC Metering Systems that have aggregated DUoS billing and are not 100kW Metering Systems
- G: non-domestic HH WC metered Metering Systems that have aggregated DUoS billing and are not 100kW Metering Systems

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[CP1429 'Proving Test timescales'](#) was also implemented in June 2015 and put in place timescales for proving tests for a CoP10 Metering System. These timescales allow 15 Working Days (WD) in which to complete the proving test, with a subsequent 15WD period given if a re-test is required.

## How will this impact the migration to HH Settlement under P272?

P272 requires that all Metering Systems currently registered in Profile Classes (PCs) 5-8 which have an AMR Meter installed are settled HH no later than 1 April 2017. There are currently a total of around 168,000 Metering Systems in PCs 5-8, and these will all need to be migrated to HH Settlement before P272's Implementation Date. These will all be subject to a proving test as part of this.

The implementation of [P300 'Introduction of new Measurement Classes to support Half Hourly DCUSA Tariff Changes \(DCP179\)'](#) on 5 November 2015 will introduce two new Measurement Classes for HH settled Metering Systems that are below the 100kW threshold. It is likely that the full-scale migration of Metering Systems impacted by P272 will not begin before this date, as Suppliers will want to migrate their Metering Systems to the correct Measurement Class. The implementation of [P322 'Revised Implementation Arrangements for Mandatory Half Hourly Settlement for Profile Classes 5-8'](#) on 3 August 2015 has also made 5 November 2015 the mandatory start date for the migration. This will therefore give a window of around 17 months in which to complete the full migration before 1 April 2017.

## What is the issue?

There is a significant number of Metering Systems due to be migrated for P272, of which a large majority will be CoP10 Metering Systems. As part of this migration, the Metering Systems will need to move from a NHH Measurement Class to a HH Measurement Class, and therefore will need to undergo a proving test.

The Proposer believes that the current Change of Measurement Class (CoMC) process is not designed to handle such a large volume in such a short space of time. They are concerned that the timescales for proving tests for CoP10 Metering Systems are too short. They note that the normal volume of CoMCs in a given year is of the order of hundreds per HHMOA, while the volume during the P272 migration will be several times larger. This will require a corresponding increase in resource needed by HHMOAs. They also highlight [Ofgem's letter to the BSC Panel in April 2015](#) where Ofgem notes the CoMC process and the associated volume of CoMCs required under P272 could pose a potential risk to Settlement.

The Proposer considers that the reason for carrying out a proving test is to give Suppliers and HHDCs confidence that the data being retrieved from the Meter is correct both for billing and for Settlement purposes. However, they feel that the additional assurance a test provides for CoP10 Metering Systems transferring to HH Settlement is relatively minor. This is because the Meter must be providing regular remote NHH monthly readings prior to HH conversion, and the probability of an error for WC Meters is considered low. The Proposer is concerned that, during periods when a high volume of Metering Systems are being migrated:

- proving tests may be rushed by the Supplier Agents in order to meet timescales;
- or

- the timescales approved under CP1429 may be missed, resulting in the HHMOA being deemed non-compliant.

## How else is this risk being mitigated?

The Proposer has noted other changes that may mitigate this issue, but does not consider them to be enough to fully resolve the risks:

- P322 has introduced a longer timescale and a more structured approach for the P272 migration. However, the Proposer considers that, because contract renewals are seasonal, there will still be peak months of migration volumes which HHMOAs will find difficult to manage and resource.
- [CP1439 'Proving Test Permissible Software'](#) will allow HHMOAs to use approved alternative software to Meter manufacturers' software when retrieving Meter configuration details for proving tests. This would allow proving tests for a batch of Meters to be carried out in parallel. However, the Proposer considers that, while some alternative software can do this, not all the approved alternative software used by Supplier Agents has this functionality.
- [CP1440 'Exempting Metering Systems in Measurement Class F from proving tests'](#) has exempted Metering Systems migrating to new Measurement Class F from proving tests, and will be implemented alongside P300. This will reduce the number of CoP10 Metering Systems requiring proving tests. However, the Proposer believes that these will constitute only around 5% of the Metering Systems affected by P272 and thus will have little impact on the overall volume of proving tests required.

### Proposed solution

[CP1444 'Extend the timescale of CoP10 Proving Tests until the implementation of P272'](#)

was raised by Haven Power. It proposes to extend the proving test timescales for CoP10 Metering Systems as follows:

- From 15WD to 30WD to complete the proving test; and
- From 15WD to 30WD to complete a re-test should one be required.

The extended timescale will apply only to a proving test for a CoP10 Metering System that is started during the period:

- on or after the P300 Implementation Date and P322 mandatory migration start date of 5 November 2015; and
- up to but not including the P272 Implementation Date of 1 April 2017.

Proving tests started outside this window will remain subject to the 15WD timescales approved under CP1429.

The proving test timescales for Metering Systems that are assigned to any other CoP will be unaffected by CP1444.

### Proposer's rationale

The Proposer believes that increasing the timescale for P272 proving tests for CoP10 Metering Systems will allow HHMOAs to smooth out the peaks and troughs in migration volumes. This will enable them to more effectively manage their part of the process. They can also put in place sufficient resource through retaining a dedicated group of staff for the period of the migration, rather than needing a temporary workforce to cover the peak periods. The Proposer also considers that the proposed increase in timescales will help reduce the likelihood of data quality issues. They consider that these could potentially be a risk to Settlement if this volume of proving tests had to be carried out to the timescales approved under CP1429. The Proposer has spoken with a HHMOA to validate these concerns before raising this CP.

The Proposer believes that the extended timescales provide a balance between mitigating the following risks:

- any risk to Settlement arising from extending proving test timescales, which could mean it would take longer to identify a Metering System that has failed a test;
- any risk of errors occurring when attempting to comply with the current 15WD timescale during periods of high volumes of proving tests; and
- any risk of the HHMOA being non-compliant with the timescales for completing proving tests.

### CP Consultation Question

Do you agree with the CP1444 proposed solution?

*Please provide your rationale.*

We invite you to give your views using the response form in Attachment D

### Proposed redlining

Attachments B and C contain the proposed changes to [BSC Procedure \(BSCP\) 502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#) and [BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'](#) to deliver CP1444.

### CP Consultation Question

Do you agree that the draft redlining delivers the CP1444 proposed solution?

*If 'No', please provide your rationale.*

We invite you to give your views using the response form in Attachment D

### 3 Impacts and Costs

#### Central impacts and costs

##### Central impacts

CP1444 will require changes to BSCP502 and BSCP514. No system changes are required, and there will be no impact on BSC Agents.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none"><li>• BSCP502</li><li>• BSCP514</li></ul>	<i>None</i>

##### Central costs

The central implementation costs for CP1444 will be approximately £240 (one ELEXON man day) to implement the relevant document changes.

#### BSC Party & Party Agent impacts and costs

We do not expect any costs or impacts on BSC Parties or Party Agents to implement CP1444, but we seek confirmation of this through this CP Consultation.

CP Consultation Questions
Will CP1444 impact your organisation? <i>If 'Yes', please provide a description of the impact(s) on your organisation and any activities which you will need to undertake between the approval of CP1444 and the CP1444 Implementation Date (including any necessary changes to your systems, documents and processes). Where applicable, please state which of the roles that you operate as will be impacted and any differences in the impacts between each role.</i>
Will your organisation incur any costs in implementing CP1444? <i>If 'Yes', please provide details of these costs, how they arise and whether they are one-off or on-going costs.</i>
We invite you to give your views using the response form in Attachment D

## 4 Implementation Approach

### Recommended Implementation Date

CP1444 is proposed for implementation on **5 November 2015** as part of the November 2015 BSC Systems Release.

The Proposer is requesting this date as it aligns with P300's introduction of the two new Measurement Classes. They expect that the number of Metering Systems migrating to HH Settlement will notably increase after this time. Extending CoP10 proving test timescales from this date will allow HHMOAs to better handle proving test volumes during the implementation of P272. We do not see an issue with implementing CP1444 on this date, should it be approved, and so agree with this proposed implementation approach.

### CP Consultation Question

Do you agree with the proposed implementation approach for CP1444?

*Please provide your rationale.*

We invite you to give your views using the response form in Attachment D



### ELEXON's initial views

The Proposer has highlighted the trade-off between mitigating the risk of a HHMOA or HHDC failing to meet proving test timescales and the risk to Settlement arising from taking longer to identify Metering Systems failing a proving test. They consider their proposed 30WD timescales provide the most suitable balance between the two.

We are concerned that by extending the timescales, as proposed by this CP, there is a risk of proving tests being unduly delayed which could otherwise be completed in 15WD. This could result in a longer period over which Settlement errors could build, and which would need correcting if the Metering System failed the proving test. We consider this risk to Settlement to outweigh the consequences of a HHMOA failing to meet the proving test timescales. We therefore consider that the timescales should not be extended but that HHMOAs should continue to endeavour to meet the timescales approved under CP1429. We believe views on this balance of risk should be sought from CP Consultation respondents.

As part of this, we believe it would also be beneficial to ask HHMOAs whether the extended timescales proposed by CP1444 will be long enough for them to be able to resolve all failed proving tests, or whether there will still remain the risk that they could fail to meet these timescales. In light of the risks discussed above, we would not consider it appropriate to extend the timescales if HHMOAs would still be unable to meet them.

We also note that a large part of the issue can relate to carrying out a proving test when there is no load to prove against. In this situation, we are unclear how the additional time proposed would resolve this issue.

#### CP Consultation Questions

Do you consider that the potential risk to Settlement from extending the timescales for CoP10 proving tests would outweigh the consequences of a HHMOA failing to meet timescales?

*Please provide your rationale.*

Do you consider that the proposed 30WD timescales is long enough to resolve each failed proving test during the P272 migration period?

*Please provide your rationale.*

How will the additional time proposed by CP1444 help to resolve the reasons for not being able to complete a proving test within the current timescales?

*Please provide your rationale.*

We invite you to give your views using the response form in Attachment D

### SVG's initial views

The SVG considered CP1444 at its meeting on 4 August 2015 ([SVG174/09](#)).

Members of the SVG believed that CP1444 seemed a practical and sensible solution. One Member noted that Supplier Agents would likely see a significant increase in the number of proving tests required around the contract rounds in April and October. Another Member queried whether the proposed six week timescale would be long enough, but the SVG

overall believed that 30WD was the right timescale to put forward, and did not believe that there was a case for anything longer.

The SVG noted ELEXON's views around the potential risk to Settlement, but Members did not agree that CP1444 would increase the risk to Settlement. One Member believed that as long as any correction to erroneous data was in place by the Second Reconciliation Run (R2) then this should not be an issue for Settlement. R2 takes place around five months after the relevant Settlement Date, and the timescales proposed by CP1444 would still meet this. It was thought that any impact would more likely relate to cash flows, such as those arising from imbalance should incorrect Meter readings affect the Supplier's imbalance position.

## Appendix 1: Glossary & References

### Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
AMR	Automatic Meter Reading
BSCP	Balancing and Settlement Code Procedure ( <i>Code Subsidiary Document</i> )
CoMC	Change of Measurement Class
CoP	Code of Practice ( <i>Code Subsidiary Document</i> )
CP	Change Proposal
CPC	Change Proposal Circular
CT	current transformer
HH	Half Hourly
HHDC	Half Hourly Data Collector ( <i>Party Agent</i> )
HHMOA	Half Hourly Meter Operator Agent ( <i>Party Agent</i> )
NHH	Non Half Hourly
PC	Profile Class
R2	Second Reconciliation Run ( <i>Settlement Run</i> )
SVG	Supplier Volume Allocation Group ( <i>Panel Committee</i> )
WC	whole current
WD	Working Days

### DTC data flows and data items

DTC data flows and data items referenced in this document are listed in the table below.

DTC Data Flows and Data Items	
Number	Name
D0268	Half Hourly Meter Technical Details

### External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	Codes of Practice page on the ELEXON website	<a href="https://www.elexon.co.uk/bsc-related-documents/related-documents/codes-of-practice/">https://www.elexon.co.uk/bsc-related-documents/related-documents/codes-of-practice/</a>

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External Links		
Page(s)	Description	URL
2	CP1261 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1261-introducing-metering-code-of-practice-10-to-facilitate-smart-metering-in-the-half-hourly-hh-market/">https://www.elexon.co.uk/change-proposal/cp1261-introducing-metering-code-of-practice-10-to-facilitate-smart-metering-in-the-half-hourly-hh-market/</a>
2	CP1273 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1273-changes-to-the-scope-of-cop10-to-cover-current-transformer-operated-meters/">https://www.elexon.co.uk/change-proposal/cp1273-changes-to-the-scope-of-cop10-to-cover-current-transformer-operated-meters/</a>
2	CP1411 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1411/">https://www.elexon.co.uk/change-proposal/cp1411/</a>
2	P272 page on the ELEXON website	<a href="https://www.elexon.co.uk/mod-proposal/p272-mandatory-half-hourly-settlement-for-profile-classes-5-8/">https://www.elexon.co.uk/mod-proposal/p272-mandatory-half-hourly-settlement-for-profile-classes-5-8/</a>
3	CP1429 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1429/">https://www.elexon.co.uk/change-proposal/cp1429/</a>
3	P300 page on the ELEXON website	<a href="https://www.elexon.co.uk/mod-proposal/p300/">https://www.elexon.co.uk/mod-proposal/p300/</a>
3	Ofgem's Response to the BSC Panel's Request to Extend the P272 Implementation Date on the Ofgem website	<a href="https://www.ofgem.gov.uk/publications-and-updates/ofgem-response-request-extension-implementation-date-balancing-and-settlement-code-modification-p272">https://www.ofgem.gov.uk/publications-and-updates/ofgem-response-request-extension-implementation-date-balancing-and-settlement-code-modification-p272</a>
3	P322 page on the ELEXON website	<a href="https://www.elexon.co.uk/mod-proposal/p322/">https://www.elexon.co.uk/mod-proposal/p322/</a>
4	CP1439 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1439/">https://www.elexon.co.uk/change-proposal/cp1439/</a>
4	CP1440 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1440/">https://www.elexon.co.uk/change-proposal/cp1440/</a>
5	CP1444 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1444/">https://www.elexon.co.uk/change-proposal/cp1444/</a>
6	BSCPs page on the ELEXON website	<a href="https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/">https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/</a>
9	SVG174 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/svg-174/">https://www.elexon.co.uk/meeting/svg-174/</a>