

CP1462 'Allow the CDCA to break and remake Metering Equipment seals to access local interrogation port'



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Contents

1	Why Change?	2
2	Solution	3
3	Impacts and Costs	5
4	Implementation Approach	7
5	Initial Committee Views	8
	Appendix 1: Glossary & References	9

About This Document

The purpose of this CP1462 CP Consultation is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of CP1462. The Imbalance Settlement Group (ISG) will then consider the consultation responses before making a decision on whether or not to approve CP1462.

There are four 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 ISG's initial views on the proposed changes.
- Attachment A contains the CP1462 Proposal Form.
- Attachments B and C contain the proposed redlined changes to deliver the CP1462 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.

CP1462
CP Consultation

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Page 1 of 9

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1 Why Change?

The role of the Central Data Collection Agent

The Central Data Collection Agent (CDCA) is responsible for collecting, or procuring the collection of, metered data from Central Volume Allocation (CVA) registered Metering Systems by either remote or on-site interrogation. Almost all CVA Metering Systems are interrogated remotely. However, in the event of any fault of any communications link (or any error, or omission, in metered data, or all necessary data not being available from Outstations), the CDCA is required, under [Section R1.4.3 of the Balancing and Settlement Code \(BSC\)](#), to collect, or procure the collection of, metered data by on-site interrogation.

Who is responsible for sealing Metering Equipment?

Approved Modification Proposal [P190 'Removal of the obligation on the CDCA to provide witnessing and sealing service in respect of all Metering Equipment associated with CVA Metering Systems'](#) removed the obligation on the CDCA to break seals and witness 'before' and 'after' Meter readings. The rationale for the Modification was to make efficiencies by removing the need for both the CDCA and the Meter Operator Agent (MOA) to be onsite at the same time whilst sealing Metering Equipment. P190 therefore removed the obligation on the CDCA to reseal Metering Equipment after work (routine or faults), allowing the MOA to do it whilst on site. The CDCA was also previously required to attend the site to seal newly installed Metering Equipment or reseal existing Metering Equipment where a seal was broken by the CVA MOA or operational staff at a site in an operational emergency. Since P190 was implemented the responsibility for providing a sealing service sits solely with the CVA MOA and specifically excludes the CDCA.

What is the issue?

With certain CVA Metering System Outstations a seal(s) has to be broken in order to access the Outstation's local interrogation port to download metered data.

Where a communications link has not yet been installed for a new Metering System or there is a communications link fault, the CDCA can, with the agreement of the Registrant, break a seal(s) to access the Outstation's local interrogation port and download the metered data.

The issue is that, since P190, if the CDCA has to break a seal to download metered data it has to leave the Outstation's local interrogation port unsealed until the CVA MOA attends the site to reseal the Outstation's local interrogation port. The period in which the Outstation's local interrogation port remains unsealed could be several months as the CVA MOA may wait until the communication line(s) is(are) repaired by a third party. The Outstation's local interrogation port is password protected so the risk to Settlement of leaving the local Outstation's interrogation port unsealed is very low. However, sealing the Outstation's local interrogation port immediately after downloading metered data would improve the efficiency of the process by reducing CVA MOA costs and completing all the work in one visit.

Proposed solution

[CP1462 'Allow the CDCA to break and remake Metering Equipment seals to access local interrogation port'](#) was raised by ELEXON on 9 May 2016.

To avoid the unnecessary expense of the CVA MOA attending sites to reseal the Outstation's local interrogation port (or other seals which are required to be broken to get to the Outstation's local interrogation port), this CP proposes to change [BSC Procedure \(BSCP\) 06 'CVA Meter Operations for Metering Systems Registered in CMRS'](#) to allow the CDCA to break and remake seals, where necessary, in order to carry out on-site interrogation of Outstations.

ELEXON holds a central register of all CVA MOA sealing pliers and will issue the CDCA with a unique sealing pliers ID. The CDCA will be required to maintain its own register of sealing pliers detailing when, to whom and which unique pair(s) of sealing pliers has been issued for use by its operatives. The register will also specify details of any lost or stolen pliers, any pliers sent for repair (the CDCA shall ensure that records relating to repairs are kept for at least 10 years), and the dates on which any sealing pliers were destroyed.

Additionally, the CDCA will ensure that its register of sealing pliers is made available for inspection by the BSC Auditor.

The CDCA will discuss with the Registrant and the CVA MOA the need to attend the site to carry out a local interrogation of the Outstation and agree the frequency of visits. In the event that the CDCA needs to break a Metering Equipment seal(s) to access the local interrogation port and interrogate the Outstation(s), the CDCA shall reseal the Metering Equipment immediately afterwards. The CDCA will update the on-site register of seals applied form. The CDCA will then notify the CVA MOA (and Registrant, if required) that a seal has been broken and remade. The CDCA shall include the following details in the notification:

- the Metering System ID (MSID);
- the circuit name;
- the Metering Equipment sealed;
- the date the seals were applied;
- the sealing pliers ID and number; and
- the name of the CDCA operative who applied the seal(s).

The CVA MOA will update its local copy of the 'register of seals applied' form.

In following this process, the CVA MOA (and Registrant) can maintain an audit trail for the Metering System. The CDCA shall also keep a copy of the notification for audit purposes.

When requested, ELEXON will provide the Technical Assurance Agent (TAA) with an updated copy of the central register of sealing pliers which details the company/role to whom a sealing pliers ID is assigned and the effective from date (and any effective to date) for the sealing pliers ID.

Proposer's rationale

In the event of a fault of any communication link the CDCA tends to rely on the Registrant to provide it with actual metered data (downloaded locally by the CVA MOA) or estimates or substituted values in accordance with [BSCP03 'Data Estimation and Substitution for Central Volume Allocation'](#) for use in Settlement.

CP1462 proposes to allow the CDCA to break and remake seals and then notify the Registrant and the CVA MOA where seals have been broken and remade.

This will:

- allow the CDCA to use greater volumes of actual metered data from CVA Metering Systems in Settlement; and
- provide a more efficient process for sealing Metering Equipment.

In addition the risks of leaving Metering Equipment unsealed would be reduced further.

CP Consultation Question

Do you agree with the CP1462 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 BSCP06 and CDCA Service Description to deliver CP1462. Please note we have made some minor amendments to the CDCA Service Description redlining from the version issued to the ISG for comment.

CP Consultation Question

Do you agree that the draft redlining delivers the CP1462 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

CP1462 will require changes to BSCP06. The central implementation costs for CP1462 will be approximately £240 (one ELEXON man day) to implement the relevant document changes.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP06CDCA Service Description	None

No system changes are required. However, the CDCA will need to order sealing pliers which are marked differently from those used by CVA MOAs. These will cost approximately £475 for four sets of sealing pliers for the CDCA operatives. No other costs are expected for changing CDCA processes or training in order to deliver the sealing service.

The CDCA Service Description will need updating too to reintroduce the requirement to break and remake the seal(s) to download metered data.

The TAA will also have to update its documents and/or the TAA Working Instruction to acknowledge that the CDCA will be sealing certain Metering Equipment and providing it with details of the meters and seals broken and resealed. The TAA will need to confirm the sealing pliers ID against the Central Sealing Pliers Register which we will provide a copy of to them.

BSC Party & Party Agent impacts and costs

CP1462 is expected to impact CVA MOAs and Registrants of CVA Metering Systems. We believe that minor process changes may be required for these participants to implement the solution. However we seek confirmation of this through this CP Consultation.

No other BSC Parties or Party Agents are expected to be impacted by this change.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
CVA MOAs	Changes may be required to implement the solution
Registrants	

CP Consultation Questions

Will CP1462 impact your organisation?

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 CP1462 and the CP1462 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.

Will your organisation incur any costs in implementing CP1462?

If 'Yes', please provide details of these costs, how they arise and whether they are one-off or on-going costs.

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

4 Implementation Approach

Recommended Implementation Date

CP1462 is proposed for implementation on **3 November 2016** as part of the November 2016 BSC Systems Release.

The November 2016 Release is the next available Release that can include this CP.

CP Consultation Question

Do you agree with the proposed implementation approach for CP1462?

Please provide your rationale.

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

ISG's initial views

The ISG considered CP1462 at its meeting on 21 June 2016 ([ISG182/01](#)).

An ISG Member questioned the number of site visits that a CVA MOA carries out. We responded that the CDCA relies on the registrant of a Metering System to provide data when data may not be downloadable remotely. We estimated that around one to two percent of sites incur a site visit. An ISG Member questioned whether the CDCA had the resource to attend site visits, to which we responded that the CDCA does and that it will create a Local Working Instruction (LWI) in due course.

An ISG Member questioned whether Registrants are causing delays. We noted that the requirement is for the CDCA to go to site and obtain data where it cannot be obtained remotely, and that this is not currently taking place. We added that it is fortunate that there have not been any issues as yet in relation to obtaining data from the Registrant.

An ISG Member questioned whether the BSCP06 redlined text had considered notifying the Registrant in advance that the CDCA will require access to the site. We considered that the BSCP06 redlined text requires the CDCA to agree a schedule of visits with the Registrant. We believe it is an option available to the Registrant that the CDCA notifies them in advance prior to each visit and we do not believe the redlined text needs to be modified to mandate that the CDCA notifies the Registrant prior to each visit.

The ISG did not ask for any additional questions to be added to the CP Consultation.

Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code (<i>industry Code</i>)
BSCP	Balancing and Settlement Code Procedure (<i>Code Subsidiary Document</i>)
CDCA	Central Data Collection Agent (<i>BSC Agent</i>)
CVA	Central Volume Allocation
CP	Change Proposal
CPC	Change Proposal Circular
HHU	Hand Held Unit
ISG	Imbalance Settlement Group (<i>Panel Committee</i>)
LIU	Local Interrogation Unit
LWI	Local Working Instruction
MOA	Meter Operator Agent (<i>Party Agent</i>)
MSID	Metering System ID
TAA	Technical Assurance Agent (<i>BSC Agent</i>)

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, 3, 4	BSCPs page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
2	P190 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p190-removal-of-the-obligation-on-the-cdca-to-provide-a-witnessing-and-sealing-service-in-respect-of-all-metering-equipment-associated-with-cva-metering-systems/
3	CP1462 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1462/
8	ISG182 page on the ELEXON website	https://www.elexon.co.uk/meeting/isg-182/

CP1462
CP Consultation

11 July 2016

Version 1.0

Page 9 of 9

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