

CP Consultation Responses



CP1479 'Updates to the Defined Metering Points in Codes of Practice 1, 2, 3, 5 and 10'

This CP Consultation was issued on 9 January 2017 as part of CPC00773, with responses invited by 3 February 2017.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Association of Meter Operators	0/1	Members of the AMO
ScottishPower	3/2	Generator, Distributor, ECVNA, MVRNA
SP Distribution / SP Manweb	2/0	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Association of Meter Operators	✓	✗	✗	✓
ScottishPower	✓	✗	✗	✓
SP Distribution / SP Manweb	✓	✓	✓	✓

Question 1: Do you agree with the CP1479 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
3			

Responses

Respondent	Response	Rationale
Association of Meter Operators	Yes	Improves the clarity of requirements within the Metering CoPs.
ScottishPower	Yes	We agree with the CP1479 proposed solution
SP Distribution / SP Manweb	Yes	Please note as a Distribution business we are only responding with respect to Case 1 as it has the potential to directly impact us.

Question 2: Do you agree that the draft redlining delivers the CP1479 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
2	1		

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
Association of Meter Operators	No	See comments below
ScottishPower	Yes	No further comments
SP Distribution / SP Manweb	Yes	While we agree with the draft redlining we would refer to our response in Q6, where we agree with SVG members view that 100 metres would be a more appropriate distance and the legal text should, if agreement is reached, be amended to reflect the 100 metres distance.

Question 3: Will CP1479 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
1	1	1	

Responses

Respondent	Response	Rationale
Association of Meter Operators	No comment	
ScottishPower	No	No further comments
SP Distribution / SP Manweb	Yes	If approved we will require to amend our documentation and processes to ensure that any such sites comply with whatever distance, either 50 or 100 metres is agreed.

Question 4: Will your organisation incur any costs in implementing CP1479?

Summary

Yes	No	Neutral/No Comment	Other
1	1	1	

Responses

Respondent	Response	Rationale
Association of Meter Operators	No comment	
ScottishPower	No	We do not foresee any additional costs in implementing CP1479
SP Distribution / SP Manweb	Yes	

Question 5: Do you agree with the proposed implementation approach for CP1479?

Summary

Yes	No	Neutral/No Comment	Other
3			

Responses

Respondent	Response	Rationale
Association of Meter Operators	Yes	
ScottishPower	Yes	We agree with the proposed implementation approach set out within CP1479
SP Distribution / SP Manweb	Yes	

Question 6: Do you agree with the suggested maximum distance value of 50 metres in relation to the proposed solution for Case 1? An SVG Member has suggested that 100 metres might be more appropriate for the reasons outlined in Section 5.

Summary

Yes	No	Neutral/No Comment	Other
2	1		

Responses

Respondent	Response	Rationale
Association of Meter Operators	Yes	
ScottishPower	Yes	No further comments
SP Distribution / SP Manweb	No	We agree with the SVG member and the rationale put forward that 100 metres seems to be more appropriate. We would also point out that Issue 54 Group identified that a distance of 1500m of 132kV cable between the AMP and the point of connection did not have a material effect on losses, plus they also noted 50 metres may be intuitively shorter than expected. Therefore on that basis we would support the SVG member's view that 100 metres seems a more sensible compromise.

Question 7: Do you have any further comments on CP1479?

Summary

Yes	No
1	2

Responses

Respondent	Response	Comments
Association of Meter Operators	Yes	A concern that the change could lead to unintended consequences. Where there is the ability to move the commercial boundary to the low voltage side of a 'generation' transformer then the transformer losses become part of the transmission losses and are shared across all parties, whereas if the commercial boundary is on the high voltage side the transformer losses are directly attributable to the generator party. Where there is a commercial advantage to one or more parties then new connections will be engineered to maximise the commercial advantage of the developer rather than the benefit of all customers.
ScottishPower	No	No further comments
SP Distribution / SP Manweb	No	

CoP 1

Respondent	Location	Comment
Association of Meter Operators	App A para 1	"A party may install..." There is only one following bullet point, so the text should read "shall" instead of "may" and the bullet point is not required as there is only one option

CoP 2

Respondent	Location	Comment
Association of Meter Operators	App A para 1	"A party may install..." There is only one following bullet point, so the text should read "shall" instead of "may" and the bullet point is not required as there is only one option

CoP 3

Respondent	Location	Comment
Association of Meter Operators	App A para 1	"A party may install..." There is only one following bullet point, so the text should read "shall" instead of "may" and the bullet point is not required as there is only one option

CoP 5

Respondent	Location	Comment
Association of Meter Operators	App A para 1	"A party may install..." There is only one following bullet point, so the text should read "shall" instead of "may" and the bullet point is not required as there is only one option

CoP 10

Respondent	Location	Comment
Association of Meter Operators	App A para 1	"A party may install..." There is only one following bullet point, so the text should read "shall" instead of "may" and the bullet point is not required as there is only one option