

CP Assessment Report

CP1491 'Lack of clarification surrounding the timeliness of Proving Tests and relevant documentation for CVA MOA in BSCP02'

ELEXON



Committee

Imbalance Settlement Group

Recommendation

Accept

Implementation Date

22 February 2018
(February 2018 Release)



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About This Document

This document is the Change Proposal (CP) Assessment Report for CP1491 which ELEXON will present to the ISG at its meeting on 22 August 2017. The ISG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1491.

There are three 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 and the views of respondents to the CP Consultation.
- Attachment A contains the proposed redlined changes to deliver the CP1491 solution.
- Attachment B contains the full responses received to the CP Consultation.

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1 Why Change?

Background

The Balancing and Settlement Code (BSC) Auditor conducted an audit of Central Volume Allocation (CVA) Meter Operator Agents (MOAs) during the audit period ending 31 March 2015. The Auditor identified an issue related to a lack of clarification regarding MOA BSC Procedure (BSCP) requirements (BSC Auditor's Summary of Market Issues). The issue relates to the requirements in, and documents related to, [BSCP02 'Proving test requirements for Central Volume Allocation Metering Systems'](#).

BSCP02 defines the minimum requirements for proving new, and changes to, existing CVA Metering Systems. In order to maintain the integrity of Settlement, every new CVA Metering System is required to go through a full end-to-end set of Commissioning tests (in accordance with [Code of Practice \(CoP\) 4 'Code of Practice for the calibration and commissioning requirements of Metering Equipment for Settlement purposes'](#)) and Proving Tests (in accordance with BSCP02). This must be done before the Registrant first registers the new Metering System for Settlement purposes in the Central Meter Registration Service (CMRS).

Commissioning tests are the minimum requirements necessary to establish that the Metering Equipment¹, comprised within a Metering System, is accurately measuring and recording the energy (consumption or generation) in an Outstation² at a Site.

As set out in the introduction to BSCP02, the purpose of a Proving Test is to establish the following:

- The Meter Technical Details (MTDs) submitted by the MOA or the Registrant to the Central Data Collection Agent (CDCA), to enable data collection be complete, are accurate and correctly transferred to the CDCA instation;
- The CDCA be able to interrogate the Metering System Outstation and satisfactorily retrieve the relevant metered data in the required format; and
- Prove that a Meter register advance (provided by the MOA to the CDCA) for a given Settlement Period is consistent with the metered data retrieved by the CDCA for that same Settlement Period.

The Commissioning organisation and/or MOA must complete all Commissioning tests before the CDCA and MOA carry out a Proving Test. The CVA MOA must complete all testing (including sealing the Metering Equipment) before the Settlement effective from date (EFD) of the new CVA Metering System. For a new CVA Metering System the CDCA and MOA must complete the Proving Test at least eight Working Days (WDs) before the EFD of the Metering System.

Where a Registrant transfers an existing commissioned and proven Supplier Volume Allocation (SVA) Metering System from a Supplier Meter Registration Service (SMRS) to the CMRS, the CDCA and MOA must complete the (CVA) Proving Test within five WDs after the EFD of the new Metering System.



Central Meter Registration Service (CMRS)

The service for registration of data relating to CVA Metering Systems maintained (for the purposes of the Code) by the CDCA.



Supplier Meter Registration Service (SMRS)

The service provided or to be provided by a Licensed Distribution System Operator for the registration of Metering Systems at Boundary Points on its Distribution System(s) and its Associated Distribution System(s) (if any), in accordance with the Master Registration Agreement.

¹ Metering Equipment means Meters, measurement transformers (voltage, current or combination units), metering protection equipment including alarms, circuitry, associated Communications Equipment and Outstations and wiring.

² An Outstation is an item of Metering Equipment which receives and stores data from a Meter(s). The CDCA interrogates the Outstation to transfer the stored metered data to its instation (i.e. data collection system). The Outstation(s) may be one or more separate units or may be integral with the Meter(s).

When a MOA makes changes or additions to an existing Metering System, not all the activities performed on the existing Metering System will require a full Proving Test. The CDCA and the MOA can therefore perform other agreed checks subject to the MOA (where necessary) performing a risk assessment and the CDCA agreeing to it.

What is the issue?

The BSC Auditor identified a lack of clarity in certain areas of BSCP02:

- Amongst some MOAs identifying when a Proving Test must be completed and when relevant documentation is to be submitted (i.e. forms BSCP02/4.2 (a) & (b) 'Metering System Commissioning Record' and BSCP02/4.3 'Metering System Proving Test Record').
- BSCP02 Sections 3.1.6, 3.2.6, 3.3.4, 3.4.6, 3.6.6 and 3.7.5³ require the MOA to send a BSCP02/4.3 'Metering System Proving Test Record' to the CDCA within one WD of completion of the Proving Test. A similar requirement applies to sending Commissioning forms after Commissioning tests are completed (BSCP02 Sections 3.1.3, 3.2.3, 3.4.3, 3.5.1 and 3.6.3⁴). The Auditor suggested that deadlines to submit documentation may not be viable in certain circumstance (e.g. where MOAs have no internet access when working at remote sites).
- Forms provided in BSCP02 may not always be compatible with the newest type of CVA Meters (i.e. Meters with integral Outstations).

³ The BSC Auditor identified the following sections in its market issue document in relation to proving test documents: 3.2.6, 3.3.5, 3.4.6 and 3.6.6. ELEXON confirmed with the BSC Auditor that this list is slightly incorrect and incomplete and the relevant sections are: 3.1.6, 3.2.6, 3.3.4, 3.4.6, 3.6.6 and 3.7.5.

⁴ The BSC Auditor identified the following sections in its market issue document in relation to Commission documents: 3.2.2, 3.4.2 and 3.6.2. ELEXON confirmed with the BSC Auditor that the relevant sections are: 3.1.3, 3.2.3, 3.4.3, and 3.6.3. In addition, ELEXON has identified that Section 3.5.1 and 3.6.1 is inconsistent with these sections as the MOA is required to fill in the Commissioning documents but not send them to the CDCA.

Proposed solution

[CP1491 'Lack of clarification surrounding the timeliness of Proving Tests and documentation for CVA MOA in BSCP02'](#) was raised by ELEXON on 15 June 2017. It proposes to address the issues identified by the BSC Auditor by amending the following in BSCP02:

- Clarify the requirements around when Proving Tests have to be completed and documentation submitted (BSCP02/4.2 (a) & (b) 'Metering System Commissioning Test Record' and BSCP02/4.3 'Metering System Proving Test Record').
- Amend BSCP02 Section 1.2 (d) 'Objectives' to state that the Proving Test form (BSCP02/4.3) must be submitted in all scenarios where required in Sections 3.1, 3.2, 3.3, 3.4, 3.6 and 3.7.
- Amend Section 3.5 'Proving Test Requirements where an Outstation has been replaced by the same Type' and Section 3.6 'Proving Test Requirements where an Outstation has been replaced by a different Type' so that the Commissioning forms (BSCP02/4.2 (a) & (b)) completed for Section 3.5.1 and 3.6.1 are sent to the CDCA by the MOA. This is not currently stated and is inconsistent with other scenarios, for example, Section 3.4 'Proving Test Requirements where a Meter has been Replaced with a Different Meter', where the MOA is required to submit the forms to the CDCA.
- Amend Section 3.7 'Proving Test Requirements where an Outstation has been Reprogrammed' so that BSCP02/4.2 (a) & (b) forms are required to be submitted to the CDCA for consistency with other scenarios for example Section 3.4.
- Amend Section 3.5 so that BSCP02/4.4 'Confirmation of Installation of Metering Equipment' is sent to the CDCA by the MOA at the same time as the BSCP02/4.2 (a) & (b) forms as this is missing.
- Amend the timescales for returning the Proving Test document to the CDCA in Sections 3.1.6, 3.2.6, 3.3.4, 3.4.6, 3.6.6 and 3.7.6 from one WD to three WDs and change the timescales for returning the Commissioning documents to the CDCA in Sections 3.1.3, 3.2.3, 3.3.1 (additional necessary changes will make this 3.3.3), 3.4.3 and 3.6.3 to before or within three WDs of the Proving Test.
- Amend Section 3.5, as Section 3.5.1 requires the Commissioning document to be completed but not sent to the CDCA. For consistency, Commissioning documents should be sent to the CDCA within three WDs of an Outstation of a similar type being replaced (a new step 3.5.3 is proposed).
- Amend Section 3.7 that currently does not require Commissioning documents to be completed or sent to the CDCA. For consistency, it should be a requirement that Commissioning documents should be completed and sent to the CDCA within three WDs of an Outstation being reprogrammed (a new step 3.7.2 is proposed for filling in the form).
- Modify the forms BSCP02/4.2 (a) & (b) and BSCP02/4.3 to accommodate Meters with integral Outstations.

These changes will not impact the ability for the CDCA to perform its functions and will not impact Settlement. However, these changes address the BSC Auditor's concern surrounding the time requirements to send relevant documentation as detailed in BSCP02.

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What is a Housekeeping Change?

[Balancing and Settlement Code Procedure \(BSCP\) 40 'Change Management'](#) section 2.2 defines a Housekeeping Change as: *"the correction of manifest errors, minor errors and inconsistencies, including typographical errors (e.g. punctuation errors, spelling mistakes, incorrect font, incorrect capitalisation) incorrect cross-referencing, and the removal of redundant text"*.

Housekeeping Changes

In addition to the changes detailed above, we propose to make three Housekeeping Changes as part of this CP. Including these Housekeeping Changes in this CP is more efficient than progressing a separate CP. These are as follows:

- BSCP02 Section 2.2 'List of Definitions' defines the term calibration and contains additional details about where initial Meter calibrations may take place. This additional detail is not relevant to BSCP02 as [Code of Practice 4: The Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes](#) already covers the specific requirements for calibrating Meters (which changed in November 2008 when [CP1224 'The Review of Code of Practice 4'](#) was approved). We propose to delete these superfluous details.
- In Section 3.2 'Proving Test Requirements for Extension to Existing Installation', there is a reference step number missing after 3.2.6. We will add reference step number 3.2.7 to the step following 3.2.6.
- In Section 5 'Table of Testing Requirements and Methods of Assurance of Settlement Data' the notes section of Ref 21 'VT/CT multicore changes' refers to (Ref) '15' if the Current Transformer/Voltage Transformer (CT/VT) burden changes when changes are made to the CT/VT multicore cables. This is an incorrect reference number and should be to Ref 8 'Reprogramming Meter'. We propose to replace '15' with 'Ref 8'.

Proposer's rationale

The BSC Auditor identified issues faced by MOAs in relation to BSCP02. ELEXON has accepted the findings and agrees that a solution needs to be found to resolve the issue. The proposed solution will clarify which scenarios require the MOA to submit Proving Tests and Commissioning documents to the CDCA.

This CP will also facilitate the timely submission of Commissioning and Proving Test documentation, without impacting Settlement. Additionally, it will provide suitable forms for MOAs to use where Meters with integral Outstations are fitted.

Proposed redlining

Attachment A contains the proposed changes to BSCP02 to deliver CP1491.

Three of the four respondents agreed with redlined text for this CP. One respondent remained neutral and said they would agree if we addressed their three comments that can be found in Section 6 of this document.

Since CP Consultation we have made two corrections to the redlined text. One is to address an error in our original draft redlined text, changing the reference in Section 3.2.3, from "Before or on the same day as in 3.1.6" to "Before or on the same day as in 3.2.6."

The second is a change to correct a manifest error in our proposed text for Section 3.7.2. The section reads "Immediately on replacing an Outstation" when it should be "Immediately on reprogramming an Outstation", as Section 3.7 is about requirements where an Outstation is being reprogrammed, not replaced.

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3 Impacts and Costs

Central impacts and costs

Central impacts

CP1491 will require document only changes to BSCP02. No BSC Central 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">BSCP02	<ul style="list-style-type: none">None

Central costs

The central implementation costs to deliver CP1491 will be approximately £240, (one ELEXON man day) to implement the relevant document changes.

BSC Party & Party Agent impacts and costs

Following consultation, one of the four respondents (Supplier Agent: CVA MOA) said they would be impacted.

One party that is a Generator, Supplier and Non Physical Trader said they may be impacted. This potential small impact, would be on the internal working process due to the change in timescales in which Proving Tests documentation is sent. The other two respondents said they would not be impacted.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
CVA MOA	Impacts on the timeliness of Proving Tests and required documents to be sent.
Supplier	Following consultation responses, some Suppliers may need to make minor changes to their internal processes.

Participant costs

One of the four respondents highlighted they would incur a cost from this CP, but did not specify how much. This cost is associated with the need to carry out Proving Tests when replacing components.

4 Implementation Approach

Recommended Implementation Date

CP1491 is proposed for implementation on **22 February 2018** as part of the February 2018 BSC Release. This is the next available Release that this CP can be included in.

The four respondents to the CP Consultation agreed with the proposed implementation date for CP1491. No further comments were received on the implementation approach.

ISG's initial views

The ISG considered CP1491 at its meeting on 27 June 2017 ([ISG195/08](#)).

An ISG Member asked if extending the timescale to submit Proving Test and Commissioning documents from one WD to three WDs would affect the timescales recently implemented under [CP1458 'Introduction of timescales for the P283 Commissioning process for SVA CT operated Metering Systems'](#) and [P283 'Reinforcing the Commissioning of Metering Equipment Processes'](#), going forward. ELEXON advised that the timescales should not be impacted, as this CP affects CVA Metering Systems not SVA Metering Systems which CP1458 affects. For clarification, P283 sought to make sure that Commissioning and CT/ VT certification were provided to the MOA where CTs and VTs are owned by the Licensed Distribution System Operator (LDSO) rather than the customer, and getting that information to the MOA.

An ISG Member asked for clarification over how this CP would facilitate timely submission of Commissioning and Proving Test documentation without impacting Settlement, and how it would get data to CDCA three WDs after the Proving Test without affecting Settlement. The ISG Member noted that getting timely exchanges of information would affect Settlement. ELEXON advised that Proving Tests need to be conducted at least eight WDs prior to energisation. Therefore the three WD timescale instead of the one WD timescale does take additional time. However in doing so, the CDCA would only need to wait for the Proving Test document to turn up, to then read the Outstations associated with the Meter(s) and then compare their readings to the CVA MOA's readings.

An ISG Member asked if the issues the BSC Auditor identified were new or only just noticed. ELEXON noted that they were both new and outstanding. For example, there has been a gradual increase in CVA Meters with integral Outstations being used over Meters with separate Outstations. Therefore the BSCP02 forms have been an ongoing issue but have recently become more prominent. An ISG Member noted in relation to Offshore wind farms that it is becoming increasingly difficult for CVA MOAs to comply with the one WD deadline, especially as the Offshore wind farms are further out to sea and it is more common for engineers to have to stay overnight.

CVA MOA Forum

An ISG Member asked if the CVA MOA Forum had contributed to this CP, as at the previous ISG meeting ([ISG194](#)) there was some discussion about some of the BSCPs that required a review. ELEXON responded that a Registrant and CVA MOA had submitted a list of suggested concerns from CVA MOAs about various documents including BSCP02, CoP4, and [BSCP06 'CVA Meter Operations for Metering Systems Registered in CMRS'](#) for ELEXON to review. ELEXON noted that it is currently in the process of assessing these.

An ISG Member suggested that any other concerns relating to BSCP02 could be included in this CP rather than being raised as a separate CP. ELEXON noted this CP was only meant to address the BSC Auditors' concerns. An ISG Member noted that as CP1491 is not directly impacting Settlement and is not urgent, it may be more efficient to combine this CP with some of the other changes noted by the CVA MOA Forum. The ISG Chairman noted that ELEXON would take this suggestion away and consider the list of concerns detailed by the CVA MOA Forum specifically in relation to BSCP02.

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Post-ISG meeting discussion

Following a post-ISG meeting discussion with two ISG Members, it was agreed to include additional consultation questions related to the CVA MOA Forum suggestions one, three and four in CP1491. By including these additional questions it was hoped to gain a better understanding of how participants believe these suggestions should be taken forward. The CVA MOA Forum suggestions can be found in Appendix 2 of this document.

Proposal two forms part of the CP1491 solution. Changes to BSCP02/4.2 (a) & (b) and BSCP02/4.3 have been proposed to accommodate Meters with integral Outstations. This is in the redlined text that has been consulted on, as per recommendation of the BSC Auditor.

Prior to issuing the CP1491 consultation ELEXON reviewed and considered the additional changes suggested by the CVA MOA Forum in relation to BSCP02. ELEXON believes these suggested changes are improvements to the current BSCP02 forms and timescales but are not critical or urgent and believed it important to seek industry views via the CP1491 consultation.

The additional CP Consultation questions can be found in Attachment B that contains the CP Consultation responses. Section 6 page 12 of this document summarises our views on how to progress the CVA MOA Forums suggestions following consultation.

6 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment B.

Summary of CP1491 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1491 proposed solution?	3	0	0	1
Do you agree that the draft redlining delivers the intent of CP1491?	3	0	0	1
Will CP1491 impact your organisation?	1	2	0	1
Will your organisation incur any costs in implementing CP1491?	1	3	0	0
Do you agree with the proposed implementation approach for CP1491?	4	0	0	0
Do you have any further comments on CP1491?	0	4	0	0

The CVA MOA Forum proposals are detailed in appendix 2.

Summary of CP1491 CP Consultation Responses related to the CVA MOA Forum's suggestions				
Question	Yes	No	Neutral/ No Comment	Other
Proposal 1: Do you believe the BSCP02/4.4 'Confirmation of Installation of Metering Equipment (including Extension or Modification of Metering System)' holds any value particularly as the CVA MOA is not always responsible for installing and commissioning measurement transformers? Do you envision any risks or issues if this form was removed from BSCP02 as part of a separate CP?	2	1	1	0

Summary of CP1491 CP Consultation Responses related to the CVA MOA Forum's suggestions

Question	Yes	No	Neutral/ No Comment	Other
Proposal 3: CP1472 'Removal of SVA Proving Tests for Meters with a pulse multiplier of one' removed the requirement in the SVA market to conduct a Proving Test for Meters with an integral Settlement Outstation that have a fixed pulse multiplier of 1. Do you believe that the same change should be implemented in the CVA market under BSCP02 as part of a separate CP? If the requirement to conduct a full Proving Test was removed for Meters with an integral Settlement Outstation that have a fixed pulse multiplier of 1, do you believe a sufficient replacement check should be a simple dial up test conducted by the CDCA with confirmation to the CVA MOA of success/failure?	3	0	1	0
Proposal 4: Do you believe that requiring a Proving test to take place at least eight WDs before the Registration Effective From Date (REFD) of a Metering System is a sensible and correct timescale? If not, why not? How many WDs do you believe would be sensible and justifiable timescale to require a Proving Test to be carried out before the REFD of a Metering System, as part of a separate CP?	3	1	0	0

Comments on the CP

We had four responses to the CP Consultation for CP1491. Of the four, three agreed with the overall solution of this CP and with the proposed redlining.

One respondent remained neutral to the solution and redlining of this CP, noting that if their three comments were addressed they would agree with both the solution and redlined text.

The first comment asks for clarification to Section 1.2d. This section gives the objectives of BSCP02. The section the respondent refers to, reads that where a component part of a Metering System being worked on is fully duplicated and the duplicate item stays unchanged, a Proving Test may be carried out by comparison between duplicate parts of the Metering System. The respondent has asked for clarification as to what are the relevant component parts in this instance? ELEXON believe we do not need to list these out in BSCP02 as they can be found in [BSC Section X: Annex X-1 – General Glossary](#).

The second comment was to do with Section 3.7.2, where ELEXON refers to the need to carry out a Commissioning test immediately after replacing an Outstation. Section 3.7 outlines the process when an Outstation is reprogrammed not replaced. ELEXON agree with this suggested change to amend the manifest error. This can be found in Attachment A.

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The third and final comment asks for an update to Section 4.2a – Metering System Commissioning Test Record. The respondent refers to table A.1, noting that start and finish times are common as are Meter and Outstation values, resulting in duplicated information being entered that isn't needed. The respondent believes making amendments to this form will bring greater efficiency. ELEXON agrees that amending this form would bring greater efficiency.

ELEXON believes this amendment addresses the original issue raised by the respondent. As this change does not address the issues raised by the BSC Auditor that CP1491 seeks to amend, this should be addressed in a separate CP.

Two respondents said this CP would not impact them. One said they would be impacted, by the additional task to carry out Proving Tests when replacing 'like for like'. The fourth respondent said this change may impact their internal process, due to timescale changes.

No respondents had any further comments to make on this CP.

Consultation responses to the suggested changes made by the CVA MOA Forum.

Based on the responses to the CVA MOA Forum questions asked in CP1491 consultation, it is ELEXON's view that one of the three proposed changes (proposal 3) should be progressed. We consider this change a material change, that does not address the issues raised by the BSC Auditor that CP1491 seeks to amend. This proposed change should therefore be progressed in a separate CP.

ELEXON will consider whether, proposal 3 from the CVA MOA forum (as per appendix 2) and the proposal from the CP1491 respondent, should be progressed together along with the other changes suggested by the CVA MOA Forum surrounding [BSCP06 'CVA Meter Operations for Metering Systems Registered in CMRS'](#) and [BSCP20 'Registration of Metering Systems for Central Volume Allocation'](#).

Proposal 1

ELEXON also asked if respondents believe the BSCP02/4.4 'Confirmation of Installation of Metering Equipment (including Extension or Modification of Metering System)' holds any value particularly as the CVA MOA is not always responsible for installing and commissioning measurement transformers. Two of the four respondents believe this form does hold value, one did not and the fourth remained neutral. One respondent noted the potential risk that if a commission document was not provided there would not be a reason to confirm 100% accuracy for the metering. The one respondent who believes the form holds no value stated that the MOA is responsible for commissioning records and certificates already and checking under P283

In ELEXON's view, supported by the responses, ELEXON does not think this change warrants progression.

Proposal 3

The CVA MOA Forum asked if there "Should be separate BSCP02 4.3 Proving Test forms for Meters with integral Outstations and Metering Systems with separate Outstations? As there is no need to check pulse multipliers for Meters with integral Outstations, a comms/password check is the key activity here." ELEXON asked a consultation question in relation to removing the requirement to carry out a Proving Test where a Meter with an integral Outstation has a fixed pulse multiplier of 1. ELEXON also asked whether a simple dial up test could be used instead for these types of Meters. Three respondents agreed

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with this proposed change, while one remained neutral. ELEXON agrees this change would increase efficiency. The three respondents noted that they did not see any risk with this proposal, while the level of urgency to implement this change was not highlighted by any of the three.

In ELEXON's view, supported by the responses, ELEXON believes this change warrants progression.

Proposal 4

Parties were asked if the existing requirement for a Proving Test to take place at least eight WDs before the Registration Effective From Date of a Metering System is a sensible and correct timescale. Three of the four respondents agreed this is an appropriate timescale and so no change is required. One respondent said no as, eight WD is not always possible as access to offsite large generation sites are in the hands of the customer not MOA. MOA can only advise customers / industry participants about BSCP02 timescales, if access is provided to offshore installation and large generation projects for Proving Tests outside of SLA timescales MOA would perform Proving Tests when possible.

In ELEXON's view, supported by the responses, ELEXON does not think this change warrants progression.

Comments on the proposed redlining

Comments on the CP1491 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP02 Section 1d	Clarification required on what are relevant component parts of metering system (note this is not redlined)	ELEXON does not believe it needs to address this issue. Parties should know which duplicated component parts of a Metering System that are relevant. BSC Section X, Annex X-1 – General Glossary defines Metering Equipment as Meters, measurement transformers (voltage, current or combination units), metering protection equipment including alarms, circuitry, associated Communications Equipment and Outstations and wiring.
BSCP02 Section 3.2.3	Change the reference from "Before or on the same day as in 3.1.6 " to " Before or on the same day as in 3.2.6"	ELEXON has amended this error.
BSCP02 Section 3.7.2	This is confusing, suggests replacing an outstation when the title of this section is reprogramming of an outstation?	ELEXON has amended this manifest error.
BSCP02 Section 4.2a	Start and finish times are common also meter and outstation values are common. These forms need	ELEXON believes this change can be incorporated in a new CP.

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Comments on the CP1491 Proposed Redlining

Document & Location	Comment	ELEXON's Response
	amending to be more efficient and user friendly.	

7 Recommendations

We invite you to:

- **APPROVE** the proposed changes for CP1491; and
- **APPROVE** CP1491 for implementation on 22 February 2018 [as part of the February 2018 Release].

Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code
BSCCo	Balancing and Settlement Code Company
BSCP	Balancing and Settlement Code Procedure
CDCA	Central Data Collection Agent
CMRS	Central Meter Registration Service
CP	Change Proposal
CPC	Change Proposal Circular
CT/VT	Current Transformer/Voltage Transformer
CVA	Central Volume Allocation
EFD	Effective From Date
ISG	Imbalance Settlement Group (<i>Panel Committee</i>)
LDSO	Licensed Distribution System Operator
MOA	Meter Operator Agent
MTDs	Meter Technical Details
REFD	Registration Effective From Date
SMRS	Supplier Meter Registration Service
SVA	Supplier Volume Allocation
WD	Working Day

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	BSC Audit – Summary of Market Issues	https://www.elexon.co.uk/wp-content/uploads/2016/12/BSC-Auditors-Summary-of-Market-Issues-2015-16.pdf
2, 8, 12	BSCPs page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
2, 5	Codes of Practice	https://www.elexon.co.uk/bsc-related-documents/related-documents/codes-of-practice/
4	CP1491 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1491/

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External Links		
Page(s)	Description	URL
5	CP1224 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1224-the-review-of-code-of-practice-4/
8	ISG195 page on the ELEXON website	https://www.elexon.co.uk/group/imbalance-settlement-group-isg/
8	CP1458 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1458/
8	P283 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p283/
8	ISG194 page on the ELEXON website	https://www.elexon.co.uk/meeting/isg-194/
11	BSC Section X page on ELEXON website	https://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/

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Proposed changes made by the CVA MOA Forum

The suggested changes made by the CVA MOA Forum in relation to BSCP02 are as follows:

1. Is there value in having the BSCP02 4.4 Confirmation of installation form? Not all CoP4 commissioning can be done to by the MOA (such as primary injections on the CTs and VTs) yet the MOA has to sign to confirm that this has been done.
2. BSCP02 assumes that the Metering System consists of a Meter and separate Outstation rather than integral Outstations. Metering technology has moved on now such that integral Outstations are the norm. The BSCP02 4.2 commissioning forms are not relevant for Meters with integral outstations as there is only the one dial read. The requirement for MOAs to submit BSCP02 4.3 commissioning forms Meters with integral outstations should be removed.
3. Should there be separate BSCP02 4.3 Proving Test forms for Meters with integral Outstations and Metering Systems with separate Outstations? There is no need to check pulse multipliers for Meters with integral Outstations, a comms/password check is the key activity here.
4. What is the rational for requiring Proving Tests eight WDs before the EFD? Can this be reduced to two or three WDs? Can something be added for circumstances where a Meter is replaced due to a fault so that it may be done on the day (without an audit finding being recorded against the MOA).