Final CP Report

CP1495 'Introduction of a rejection response data flow for a D0170 'Request for Meter System Related Details' request from the Meter Operator Agent to the Licenced Distribution System Operator where a D0215 'Provision of Site Technical Details' response is required'

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About This Document

This document is the CP1495 Final Change Proposal (CP) Report which ELEXON has published following the final decision from the Supplier Volume Allocation Group (SVG) to approve CP1495.

There are six parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and approved implementation approach. It also summarises the SVG's views on the proposed and approved changes and the views of respondents to the CP Consultation, along with the final decision on whether to approve this change.
- Attachments A-D contain the approved redlined changes to deliver the CP1495 solution.
- Attachment E contains the full responses received to the CP Consultation.

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1 Why Change?

Background

The processes for the registration, installation and Commissioning of Metering Systems are contained within Balancing and Settlement Code (BSC) Procedure (BSCP) 514 'SVA Meter Operations for Metering Systems Registered in SMRS' and BSCP 515 'Licensed Distribution'.

As part of the 'New Connections'[1] and 'Change of Measurement Class'[2] (CoMC) processes, the Meter Operator Agent (MOA) will request Site Technical Details from the relevant Licensed Distribution System Operator (LDSO). This is done by sending a D0170 'Request for Metering System Related Details' data flow from the MOA to the LDSO. Within five Working Days (WDs) of receiving a D0170 from an MOA, the LDSO is required to respond by sending a D0215[3] 'Provision of Site Technical Details' data flow. The D0215 includes information, such as measurement transformer[4] ratios (where applicable), which is essential to the MOA. The information provided in the D0215 enables the MOA to understand the site requirements and therefore install metering that correctly and accurately measures flows of electricity to and from the site.

An MOA may send a D0170 to an LDSO at any point during their appointment, as required for example (and most commonly) as part of the Change of Agent (CoA) process. The LDSO shall respond within 5 WDs in all cases by sending a D0215.

What is a data flow?

A data flow is a structured message sent over the Data Transfer Network (DTN) (used by industry participants to share data). Each data flow has a set structure and can be used to transfer specific pieces of information. Within each dataflow there will be a list of data that can be included and how it should be represented.

For more information, see the Data Transfer Catalogue website.

What is the issue?

Functionality does not exist within the D0215 for LDSOs to inform MOAs why the requested information cannot be provided. There is no formal means for an LDSO to reject a D0170 when they are not in a position to provide the requested data. This can only be communicated to the MOA informally (e.g. via e-mail), but such notifications are difficult to provide when audited.

In March 2016, the BSC Auditor raised Issue 5177 (Use and Accuracy of Information within the D0215). The Auditor highlighted that, due to MOAs' concerns over the completeness and accuracy of data in D0215, some MOAs were non-compliant for not sending D0170. Instead, MOAs chose to rely on information from alternative sources, such as the 'additional comments' field in the D0142 'Request for Installation or Change to a Metering System Functionality or the Removal of All Meters'. The Auditor also reported that LDSOs did not always reply to D0170 and, in some cases, where a D0215 had been sent, the quality of the data within it had been found to be unreliable.

Valid reasons for an LDSO not providing a D0215 to the requesting MOA are:

- Measurement transformer equipment not owned by LDSO;
- The Metering System was first registered prior to 6 November 2008[5], for which LDSOs are not obliged to respond to a request for Site Technical Details;

[1] When a Metering System is connected to the Distribution System for the first time
[2] Process used in SVA to change the Measurement Class of a metering point
[3] The D0170 must include 'Action Code 21' to prompt the LDSO to respond with a D0215
[4] Measurement transformers are either current transformers or voltage transformers and are used to measure current or voltage respectively. Collectively they are referred to as measurement transformers.
[5] See BSCP514 footnote 12.

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- The D0170 was incorrectly sent to an LDSO who is not the LDSO for that Metering System; and
- The LDSO may not hold a record of measurement transformer ratios for Metering Systems first registered after 6 November 2008 but before 6 November 2014[6].

In the absence of a response, in many cases the MOA will resend the D0170 request in an attempt to obtain a complete D0215. This can result in multiple D0170s being sent for a single Metering System. This can become resource intensive and place a strain on the processing capability of the recipient's systems. Because the MOA is unaware of the reason why the LDSO has not responded, they are unable to gain sufficient assurance of the accuracy of the Metering System. This uncertainty poses a risk to Settlement as it may result in inaccurate data entering into Settlement, thus increasing the potential for Trading Disputes[7].

There is nothing within the BSC that prevents an LDSO from sharing information with the MOA. As such, we would encourage, where an LDSO has valuable information that can be sent on the D0215, then it shall send that information regardless of obligation.

[6]Implementation date of BSC Modification P283 which placed new obligations on LDSOs and the Transmission Company

[7] See BSC Section W 'Trading Disputes'

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2 Solution

Approved solution

CP1495 was raised by ELEXON on 2 October 2017.

This CP will introduce a new data flow, DXXXX 'D0170 Rejection Response', to the Data Transfer Catalogue (DTC). The DXXXX will serve as a rejection from the LDSO where it cannot provide a complete D0215 for one of the reasons defined within the valid set of the 'rejection reason' data item (as described below). DTC CP3523 was raised to create this new flow within the DTC (it was approved on 30 November 2017) and CP1495 will reflect the DTC changes and update the associated process steps in the relevant BSCPs and other configurable items. The DXXXX will contain a new data item 'Rejection Reason' with the valid set (taken from DTC CP3523):

- Measurement transformers installed pre-2008;
- Measurement transformers are not owned by the LDSO and are unlikely to ever be adopted into LDSO ownership;
- Measurement transformers are not LDSO owned and are not yet adopted into LDSO ownership;
- LDSO is not the relevant System Operator (SO) for the Metering Point; and
- Measurement transformer ratio(s) are unknown.

Please note: *The actual numbering of the data flow will be assigned by the Master Registration Agreement Service Company (MRASCo) approximately two months before the CP1495 Implementation Date and will follow the standard 'DXXXX' format (e.g. D0170 or D0215). DXXXX is being used as a placeholder in the BSC Configurable Items amended for CP1495 to allow the SVG to approve CP1495 before the actual flow number is available. The version of these BSC Configurable Items that become effective on the CP1495 Implementation Date will contain the actual data flow number.*

Proposer's rationale

The expedient transfer of accurate and reliable information between MOAs, Registrants and LDSOs will reduce delays in Commissioning. This CP will also reduce the risk of inaccurate metering data being used in Settlement and, as a result, reduce the number of potential Trading Disputes. The rejection reasons introduced by DTC CP3523 will give MOAs enough information to make an informed decision on the next action required and to report this effectively to the Registrant where necessary.

CP1495 will allow LDSOs to respond to a D0170 where they are unable to provide the required information while giving a valid reason for why this is the case. It will be much more informative than the current approach of not responding, or responding with incomplete or erroneous data. It will provide an auditable positive confirmation of an unknown in response to a D0170. This change will therefore reduce the number of repeated D0170s being sent, reducing MOA and LDSO resource requirements and system pressures. Finally, it will bring the passing of information by data flow into line with other industry practices by allowing the use of the Data Transfer Network (DTN) to pass Meter related information. In line with current practice, DXXXX will also be able to be sent using the DTN 'or other method, as agreed'.

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ELEXON hosted a Workgroup on 25 June 2017 to discuss the creation of data flows to improve communications within the Commissioning process. The quality of D0215s was raised by the LDSOs and MOAs in attendance. The Workgroup recommended raising changes to the DTC and the BSC to introduce a new formal rejection to a D0170.

approved redlining

Attachments A-D set out the approved changes to the BSC Configurable Items required to implement the approved solution.

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3 Impacts and Costs

Central impacts and costs

Central impacts

CP1495 will require changes to four Code Subsidiary Documents (CSDs):

- BSCP514 and BSCP515 will be amended to prescribe the use of the DXXXX data flow;
- The SVA Data Catalogue Volume One will be amended to include the DXXXX data flow; and
- The SVA Data Catalogue Volume Two will be amended to include the DXXXX data flow.

CP1495 has no impact on BSC systems.

Central Impacts	
Document Impacts	System Impacts
• BSCP514 • BSCP515 • SVA Data Catalogue Volume 1: Data Flows • SVA Data Catalogue Volume 2: Data Items	• *None*

Central costs

The central implementation costs for CP1495 will be approximately £240 (one ELEXON WD) to implement the relevant document changes.

BSC Party & Party Agent impacts and costs

CP1495 will require MOAs and LDSOs to implement changes to their systems to receive and send DXXXXs. They will also need to amend their Commissioning processes.

Every consultation respondent indicated that there would be some cost involved in implementing the changes. Most stated that there would be one off costs, with only one respondent claiming that there will be minor on-going costs. One respondent gave a value (£30,000) for implementation, but most others stated that costs still needed to be scoped.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
LDSOs and Embedded LDSOs	Amend systems to create new data flows. Implement changes to Commissioning process
Half Hourly MOAs	Amend systems to receive new data flows. Implement changes to Commissioning process
Non Half Hourly MOAs	Amend systems to receive new data flows. Implement changes to Commissioning process

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4 Implementation Approach

Approved Implementation Date

CP1495 was approved by the SVG for implementation on 1 November 2018 as part of the November 2018 BSC Release. We changed the proposed implementation date from June 2018 to November 2018 to align with the associated DTC CP implementation date and responses to the CP1495 consultation. DTC CP3523 was presented to the MRASCo Development Board (MDB) on 30 November 2017. DTC CP3523 was also recommended for implementation in June 2018. However, following consultation the MDB has moved the implementation date from June 2018 to November 2018 to allow Parties sufficient time to make changes to their own systems.

The majority of respondents to CP1495 (9 of 14) thought that June 2018 would be too soon for them to make the necessary changes to their own internal systems as required by DTC CP3523. To ensure that BSC parties have sufficient time to implement this change, CP1495 was recommended for implementation on 1 November 2018 as part of the November 2018 BSC Release.

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5 Initial Committee Views

SVG's initial views

The SVG considered the CP1495 Progression Paper at its meeting on 31 October 2017 (SVG 201/05)

Concern was expressed over whether or not the proposed solution will address the issue of MOAs not having the required data, even if the LDSO responds with a DXXXX. Whilst this may be a concern, the reason for not providing the data should then drive the MOA to seek alternative means of sourcing the data. This could mean contacting another LDSO (if the equipment is not owned by the original LDSO with a D0170. Alternately, it may require a site visit to ascertain measurement transformer ratios if they cannot be obtained via any other means. Whatever route the MOA will be required to take, the content of the DXXXX will determine their action as opposed to the current situation where the lack of a response does not change anything and leaves the MOA with no clear next step to take.

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6 Industry Views

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

Summary of CP1495 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1495 proposed solution?	12	2	0	0
Do you agree that the draft redlining delivers the intent of CP1495?	12	1	1	0
Will CP1495 impact your organisation?	14	0	0	0
Will your organisation incur any costs in implementing CP1495?	13	0	1	0
Do you agree with the proposed implementation approach for CP1495?	4	9	0	1
Do you have any further comments on CP1495?	4	10	0	0

Proposed solution

All but two of the 14 respondents agreed with the CP1495 Solution. Of those that agreed, some provided additional comments. The positive comments included:

- Potential reduction in resource and confusion;
- CP1495 addresses the lack of a process for LDSOs to rectify current issues and benefits will be realised once implemented by all LDSOs;
- It seems sensible to introduce a new data flow to allow the rejection of a request received via a D0170 where appropriate.

Two of the twelve that agreed with the proposed solution had reservations. One is concerned that the D0170 may be rejected even if the LDSO holds information that is not mandatory for inclusion in the D0215. The other is unclear on how to proceed when a DXXXX is received as no direction is given or proposed.

The purpose of the D0215 is to provide the MOA with useful information. With this in mind, if a LDSO holds useful information, then regardless of whether or not they are obliged to share that information, we would encourage them to share it. If however, a DXXXX is sent, then those concerned should liaise and agree the best way to proceed. We will be issuing guidance on how to implement CP1495 that will include suggested (but not exhaustive) examples on how to proceed.

Two respondents disagreed with the proposed solution entirely and made several points in their response. We spoke with each and discussed their comments and the reasons for our response. In both cases, whilst there was still disagreement, they understood our position and why we made the recommendations we did. These can be summarised as follows:

- ELEXON has not provided analysis on why D0170s are ignored
- For some parties, the current process works already, so CP1495 is not necessary

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- CP1495 is for the benefit of MOAs only, so is a cost burden on the rest of the industry
- LDSOs should hold all of the relevant information and get this from Independent Connection Providers (ICPs) given their existing commercial relationships
- The Technical Assurance of Metering Expert Group (TAMEG) should be consulted for their opinion

Due to the way in which information is currently shared, and the fact that there is no formal means of rejecting a D0170, there is no quantifiable evidence for why D0170s are rejected. This has however, been recognised by BSC audits, amongst other sources. We will interrogate the DTN following implementation of CP1495 to analyse reasons for rejection and, if required, consider how best to proceed.

CP1495 will benefit MOAs, LDSOs and Suppliers. This has been borne out by the majority of consultation responses. Ahead of raising CP1495 we took account of feedback from a cross section of industry (including the TAMEG and MRASCo's Issue Resolution Expert Group (IREG)) and the overwhelming message was that CP1495 is required. We realise that these changes will not be needed by some Parties, as their current practice is sufficient, however, the Audit and TAPAP findings, as well as feedback from industry, points to the fact that this is not the case for the majority of industry. It should be noted that CP1495 is a small part of resolving the wider issues surrounding Commissioning and we will continue to look into those and work with industry as appropriate (including concerns raised around ICPs).

Respondents' paraphrased comments, and our responses, are in Appendix 2:

Comments on the proposed redlining

The majority of respondents agreed that the proposed redlined text delivered the CP1495 intent. One respondent did not agree with the proposed redlining because they disagreed with the proposed solution (see above).

One respondent did not answer this question. It was the only one they did not answer, but they agreed with the proposed solution. We therefore inferred that they agreed with the proposed redlining.

Comments on the CP1495 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP 514 P4 5.2.1.11	Footnote link error - Error! bookmark not defined.	This was a formatting issue and does not materially affect CP1495. In BSCP514 Version 34.0 (from which the CP1495 draft redlining is extracted) this is a cross reference to footnote 28, which is a footnote to section 5.2.5.8, which does not relate to CP1495. A comment to this affect is included in the redlining approved by the SVG.
BSCP515 P3 3.3.4	Inconsistent colouring of flow name with the rest of the document and consultation	This was a formatting issue and does not materially affect CP1495. It was checked for consistency in the final version

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Comments on the CP1495 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
		submitted for approval
BSCP 515 P5 3.11.2	Method text "Electronic or other method, as agreed." Appears to be in bold and possibly in a different font size/style.	This was a formatting issue and does not materially affect CP1495. It was checked for consistency in the final version submitted for approval

Additional comments

Four respondents made additional comments outside of the five questions that were asked. These comments (where they are not similar to comments addressed above and in Appendix 2), and ELEXON's response, are in the table below:

Additional Comments on the CP1495 Proposal	
Comment	ELEXON's Response
The D0215 can be sent from LDSO to Supplier. Will the new D0170 rejection data flow also go to the Supplier?	It is not planned for the DXXXX to be sent to the Supplier. If the D0170 rejection reason leads to a defect or omission that prevents Commissioning, the MOA should proceed as per BSCP514.
Will it be mandatory for all LDSOs to implement the new rejection data flow, or could LDSOs carry on as they do now i.e. keep sending D0215s with incorrect information?	Use of the DXXXX will be mandatory. Failure to send it as required will be considered as a breach of the Code. ELEXON will raise a separate CP to create a validated set for CT/VT Ratios. This will ensure erroneous or invalid data is not sent in D0215s[8].
LDSOs can reject D0170s if they haven't taken ownership of the measurement transformer. The MOA should then re-send the D0170 at a later date. How long is this period and how will the MOA decide when to re-send the D0170?	This should be decided between the MOA and the LDSO. We understand that the adoption process can take a varying amount of time, so a defined timescale would be inappropriate. It is expected that the MOA and the LDSO work together to understand when the site will be adopted.
When the BSC Auditor conducts their audit, will they consider a rejected LDSO flow as a completed process?	For every D0170 sent, either a D0215 or DXXXX must be sent. If a DXXXX has been sent, this would be compliant with BSCP514
Will ELEXON be providing any guidance notes regarding CP1495?	We intend to provide guidance on the CP1495, CP1496 and CP1497 changes. We also plan to hold an education seminar closer to implementation.

[8] See CP1496 Assessment Report for further details

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7 Final Committee Views and Decision

SVG's final views

The SVG considered the CP1495 Assessment Report at its meeting on 30 January 2018 (SVG 204/04)

It was commented on that a lot of work has clearly gone into developing the CP1495 solution and the proposal certainly represents an improvement on the existing arrangements. However, it was recognised that this is a small part of a wider issue, such as the issue with regards to ICPs.

One member agreed with the consultation response that LDSOs should be the 'single source of truth' for disseminating Commissioning information.

As part of the CP1495 Assessment Report presentation to the SVG, ELEXON drew attention to the fact that CP1495 is part of a wider work package looking at issues and problems concerning Commissioning and re-iterated that there is work ongoing in this area. One of the things that came out of the workgroups that developed the CP1495 solution is that LDSOs would be hesitant in accepting the responsibility for sharing Commissioning information when they have not been directly involved themselves; this is why this option was discounted. However, in terms of ongoing work and the sharing of Commissioning information, ELEXON would be happy to discuss potential solutions and how they could be progressed.

It was commented on that any future work around Commissioning could potentially involve other Industry Codes, particularly in relation to ICPs. This was noted by ELEXON.

One member questioned that if it is not mandatory to include measurement transformer ratios in the D0215, then would the proposals still be applicable? It was pointed out though that the rules in Annex C of the DTC state that if there are measurement transformer ratios for a site, then their inclusion in a D0215 is mandatory.

It was suggested that the DXXXX could be included in future BSC audits. The scope of upcoming audits is yet to be determined, but it is being considered.

Final decision

The SVG has:

- **APPROVED** CP1495 for implementation on 1 November 2018 [as part of the November 2018 BSC Systems Release].

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Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code
BSCP	BSC Procedure
CoA	Change of Agent
CoMC	Change of Measurement Class
CP	Change Proposal
CSD	Code Subsidiary Document
DTC	Data Transfer Catalogue
DTN	Data Transfer Network
ICP	Independent Connection Provider
IREG	Issue resolution Expert Group
LDSO	Licensed Distribution System Operator
MDB	MRASCo Development Board
MOA	Meter Operator Agent
MRASCo	Master Registration Agreement Service Company
SMRS	Supplier Meter Registration Service
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group (*Panel Committee*)
TAMEG	Technical Assurance of Metering Expert Group
WD	Working Day

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
D0142	Request for Installation or Change to a Metering System Functionality or the Removal of All Meters
D0170	Request for Metering System Related Details
D0215	Provision of Site Technical Details

External links

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

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

External Links		
Page(s)	Description	URL
2	BSCPs page on the ELEXON website	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps/?show=all
2	BSC Audit findings page on the ELEXON website	https://www.elexon.co.uk/reference/performance-assurance/performance-assurance-techniques/audits/bsc-audit/
2	DTC page on the MRASCo website	https://dtc.mrasco.com/default.aspx
3	Modification P283 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p283/
3	BSC Section W 'Trading Disputes'	https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/
4	CP1495 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1495/
4	MRASCO Change webpage	https://mra.mrasco.com/change/creation-of-rejection-flow-response-for-d0215-request/
8	SVG 201 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-201/
11	CP1496 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1496/
12	SVG 204 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-204/

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Appendix 2: Consultation comments and ELEXON's response

This table contains paraphrased responses[9] to the CP1495 proposed solution and the ELEXON response:

Comments disagreeing with the CP1495 Proposal	
Respondent's comment	ELEXON's Response
We are concerned that a D0170 may be rejected in circumstances when the LDSO may hold some of the optional site technical details that could be provided in a D0215, and therefore this is not passed on to the MOA.	The purpose of the D0215 is to give MOAs sufficient information to understand the Metering requirements of the site. D0215s could be sent with only the mandatory items. However, in most cases, this would not provide MOAs with sufficient information to install their Meter and so we would question the value of doing so. It was considered whether a D0215 could be sent with the mandatory items included as well as the rejection reason. However, this would have meant changes to the D0215 to add a rejection reason into the data flow itself. This option was not favoured by the workgroup.
It is unclear from the solution how the MOA is supposed to proceed when a D0170 rejection is received.	It is intended that a D0170 rejection will allow the MOA, LDSO and Supplier to converse to understand the next steps, rather than just bouncing D0215 and D0170s back and forth, as currently happens in many cases. As part of the implementation programme for CP1495, ELEXON intends to create a guidance note. This guidance note will include advice on potential actions an MOA could take on receiving a DXXXX. Please note this will not be an exhaustive list and will be suggestions as opposed to mandatory requirements.
ELEXON has not presented any analysis on the reasons why companies are not responding to D0170. This is a fundamental part of the rationale as to why the creation of a rejection is required.	There is no means for LDSOs to report why they do not send D0215s, so there is no means of analysing rejection reasons and the evidence we have is anecdotal. However, the BSC Auditor did highlight issues with the process. In time, DXXXX data will be analysable and we will be able to identify trends and, if required, take actions
Our systems automatically trigger D0215s. As	We understand that for some companies

[9] See Appendix E for full comments

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Comments disagreeing with the CP1495 Proposal	
Respondent's comment	ELEXON's Response
such, we would have no knowledge of why the D0170 was sent and if we hold the measurement transformer information. This means that we would not be prompted to provide a rejection response with the appropriate code. At present, we receive an email through a mailbox and respond to the MOA with the information or a timetable to acquire it.	the current processes work well and for those few, there is no need to change and as such, the introduction of the new data flows will have little or no benefit. However, we need to consider the risk to industry and Settlement overall. From this perspective we believe change is needed. This has been confirmed by other consultation responses as well as findings from the TAPAP process and the workgroup that recommended this CP.
CP1495 appears to place a cost burden on the rest of the industry for the benefit of MOAs. We therefore recommend that this CP is withdrawn as it does not (cost efficiently) resolve the issues identified.	DXXXX will provide an audit trail for why D0170s are rejected. CP1495 will benefit LDSOs, MOAs and Suppliers, as borne out by other consultation responses. We acknowledge that there will be some cost involved in implementing CP1495. However, these are outweighed by the overall benefits in the long term.
Given LDSOs' engagement with ICPs, they are well positioned to request this information. LDSOs should be responsible for gaining this data, instead of passing it back to MOAs/Suppliers. Given LDSOs' rights to access and, as we understand, the unobtrusive nature of gaining measurement transformer records[10], we would envisage very few D0170s needing to be rejected. The issue of LDSOs not owning equipment is something that should be reported to the TAMEG to gain their position prior to CP1495 progressing.	This is a wider point around the current responsibilities for non-LDSO owned measurement transformers and as such is outside of the scope of CP1495. Whilst ELEXON accept that the CP1495 does not provide a full solution to the issues of ICP/BNO connections, this is a current issue that exists today and is not exacerbated by the introduction of the DXXXX as part of CP1495. We are aware of the wider issue of ICPs (and BNOs) and their role in the Commissioning process. This is something that ELEXON will look into as a separate piece of work. We welcome the suggestion, and will make note of this for when we look into this separate issue. TAMEG have said they want the issue of ICPs to be looked into. It is worth noting that many TAMEG members attended the Workgroup meetings that led to this CP and so are familiar with why DXXXX was proposed.

[10] E.g. customers don't need to go off Supply

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