

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

ELEXON



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About This Document

The purpose of this Change Proposal (CP) 1491 CP Consultation (CPC) is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of CP1491. The Imbalance Settlement Group (ISG) will then consider the consultation responses before making a decision on whether or not 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.
- Attachment A contains the proposed redlined changes to deliver the CP1491 solution.
- Attachment B 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.

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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, 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 Commissioning 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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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.

CP Consultation Question

Do you agree with the CP1491 proposed solution?

Please provide your rationale.

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

Proposed redlining

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

CP Consultation Question

Do you agree that the draft redlining delivers the CP1491 proposed solution?

If 'No', please provide your rationale.

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



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"*.

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3 Impacts and Costs

Central impacts and costs

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 costs

The central implementation costs to deliver CP1491 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">BSCP02	<i>None</i>

BSC Party & Party Agent impacts and costs

CP1491 is expected to impact CVA MOAs only. We believe that minor process changes will be required to implement the solution but we seek confirmation of this through this CP Consultation.

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.

CP Consultation Questions

Will CP1491 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 CP1491 and the CP149 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 CP1491?

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 B

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.

CP Consultation Question

Do you agree with the proposed implementation approach for CP1491?

Please provide your rationale.

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

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. 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 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.

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 that this was possible; however this CP was only meant to address the BSC Auditors' concerns. An ISG Member noted that as this CP 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 CP away and consider the list of concerns detailed by the CVA MOA Forum specifically in relation to BSCP02.

Post-ISG meeting discussion

Following the recommendations raised by the CVA MOA Forum, ELEXON has reviewed and considered the suggested additional changes to BSCP02. These can be found in Appendix

2. However, following a post-ISG meeting discussion with two ISG Members, it has been agreed that none of the suggested changes made by the CVA MOA Forum should be included as part of this CP. This is because we do not want to risk this CP being rejected by adding in the suggestions, as they may have a greater impact on Parties.

However, it was agreed that we should include some additional questions surrounding the CVA MOA Forum's concerns as part of this CP Consultation. We believe that by including these additional questions we will gain a better understanding of how Parties believe we should address the outstanding issues. The additional CP Consultation questions are as follows:

Additional CP Consultation Questions

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?

If 'Yes', please provide your rationale.

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?

If 'Yes', please provide your rationale.

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?

If 'Yes', please provide your rationale.

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

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	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/
8	BSCP06 page on ELEXON website	https://www.elexon.co.uk/search/?collection=elexon-meta&query=bscp06

Suggested 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).