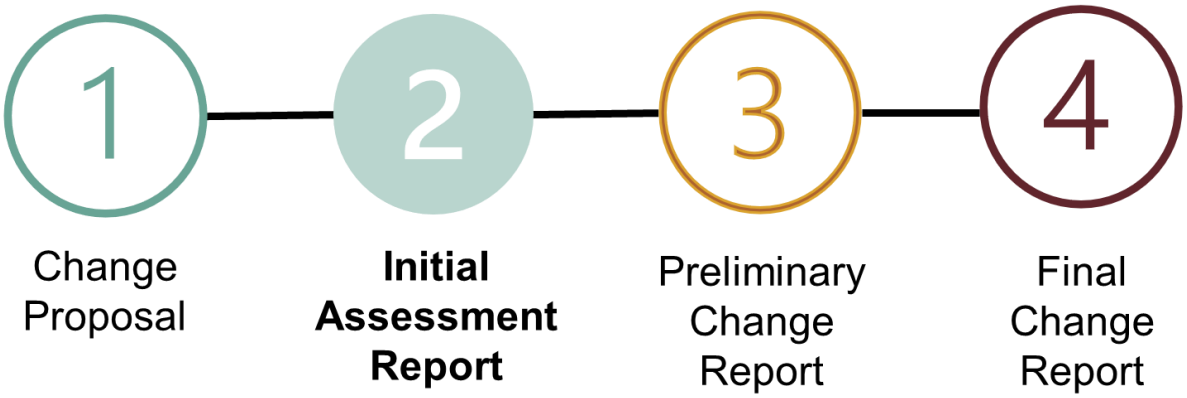
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INITIAL ASSESSMENT REPORT



PURPOSE:	This is a written report from the Code Manager setting out their initial assessment of the Change Proposal and planned next steps for progressing the proposal.
NOTES:	The Initial Assessment Report is accompanied by a Change Proposal Plan, which describes the Code Manager's plan for progressing this Change Proposal. The solution will not be finalised until the publication of the Preliminary Change Report.
NEXT STEPS:	The Change Proposal Plan will set out the next steps for progressing this Change Proposal. The Code Manager will either propose additional activities to develop and/or assess the solution, or immediately prepare and publish the Preliminary Change Report.

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01	Initial Assessment Report
02	Preliminary Change Report
03	Final Change Report

INITIAL ASSESSMENT REPORT

R0031 –ALTERING THE TRIGGER POINTS FOR CT COMMISSIONING

DOCUMENT VERSION	1.0
DATE ISSUED	25/03/2022
DOCUMENT APPROVAL STATUS	APPROVED BY REC CHANGE PANEL
RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

CHANGE OVERVIEW

Distribution Network Operators (DNO) would like the trigger points and timescales for the sending of commissioning information to be amended where the Registered Supplier initiates the Energisation of the Supply Point with their appointed Metering Equipment Manager (MEM) in relation to metering equipment with Measurement Transformers which are being pre-commissioned off-site before installation. The current process expects energisation and installation to run concurrently but in practice this is not being experienced and is affecting DNO's ability to meet their Balancing & Settlement Code (BSC) obligations.

	High Impact: N/A
	Medium Impact: DNOs & MEMs
	Low Impact: Electricity Suppliers

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1 SUMMARY

Changes are needed to the Metering Operations Code of Practice to recognise that many Distribution Network Operators (DNO) are now using Low Voltage (LV) Current Transformer (CT) pre-installed, pre-commissioned metering units for fused supplies. These units are factory commissioned and the vast majority of the commissioning for the units will be completed prior to installation and, consequently, before Energisation too. Where this type of meter is used, the requirement on the DNO to send information at the point of commissioning is no longer possible (as it relates to a date in the past) and may also be much earlier than a Registered Supplier is in place with their Metering Equipment Manager (MEM) appointed. The use of pre-commissioned units was permitted under a Balancing & Settlement Code Change Proposal (BSC CP) - BSC CP1505, which was implemented in November 2018. The timescales for commissioning were set out in an earlier BSC CP 1496, however these are no longer proving to be ideal.

The proposed change would use the date of receipt of the D0139 (MM00036**)** from the MEM (where the MEM energises the Metering Point) as the trigger point for the DNO commissioning timescales but would leave the existing process in place where the DNO is completing the energisation. So, the proposed solution separates the different trigger points for where the DNO or the MEM energises the Metering Point.

The solution proposed would remove the reference to sending the commissioning information no later than 5 Working Days (WD) after commissioning and replace it with sending it no later than 21WD after Energisation (if DNO energises) or 21WD after receipt of D0139 (MM00036) (if MEM energises). This will allow extra time for the DNO to send the commissioning information on the D0383 (MM00370) but retain the existing overall timescale of within 21WD of Energisation (where the DNO energises) and uses the same timescale where notification of Energisation is sent by the MEM via the D0139 (MM00036).

The receipt of the D0139 (MM00036) is often the point at which the DNO first becomes aware that a fused supply is now Energised. This may be several days/weeks/months after DNO commissioning, and it is proving difficult for the DNO to meet their BSC obligations. For an LV fused supply, the DNO may not be aware of who the MEM is to send the commissioning information to via a D0383 (MM00370) until a D0139 (MM00036) is received. This can be because of new connections being established before a property is occupied and a consumer puts in place a supply contract with an Electricity Supplier.

By including the variation trigger point to use of the date of receipt of D0139 (MM00036) where the MEM energises, this prevents the MEM timescale for commissioning being reduced where the DNO completes the energisation.

This solution will sit alongside proposed changes that are to be made to BSCP515.

2 PROBLEM STATEMENT

The Balancing & Settlement Code Procedure (BSCP) 515 and the Retail Energy Code (REC) Metering Operations Schedule set out the obligations and timescales imposed on the DNO to send commissioning information to the MEM (using the D0383 (MM00370) data flow), where the DNO has installed metering equipment, with Measurement Transformers.

When the DNO installs Low Voltage Current Transformer (LV CT) metering units, that have been pre-commissioned off-site, the commissioning of the units is done before installation and separately to the Energisation of the Supply. When the Energisation status change is the responsibility of the Registered Supplier and is requested of the MEM using the D0134 data flow, notification of the change in energisation status is then sent to the Registered Supplier and the DNO by the MEM, using the D0139 (MM00036)

For an LV fused supply, the DNO may not be aware of who the MEM is to send the commissioning information to via a D0383 (MM00370) until a D0139 (MM00036) is received. This is often the point at which the DNO first becomes aware that a fused supply is now Energised. This may be several days/weeks/months after DNO commissioning, and it is proving difficult for the DNO to meet their BSC obligations.

3 USER STORIES

REF.	USER STORIES
MARKET PARTICIPANT USER STORIES	
M1	As the DNO, I only want to send the commissioning information using the D0383 (MM00370) when I am made aware that the site has now been energised by the Registered Supplier's MEM for a CT Pre-commissioned meter, so that I can meet my regulatory obligations under the BSC
M2	As a MEM I want to receive the information from the DNO in a timely manner to ensure my records are accurate and up to date, and that I can provide the Registered Supplier with information to ensure the metering point is accurately settled.

4 IMPACTS

REC PARTIES AND SERVICE USERS
Distribution Network Operators
Metering Equipment Managers

RECCO AND REC CODE MANAGER
REC Code Manager

REC DOCUMENTS / PRODUCTS
Schedule 14 – Metering Operations

4.1 CROSS CODE IMPACTS

An equivalent change will be required to the BSC to BCSP515 – Licenced Distribution, to amend relevant sections to recognise the different trigger activity. The BSCP Change Proposal will be aligned with the Change Plan for the REC Change Proposal. The two Market Messages (MM) affected are owned by both the REC and the BSC: the REC owns D0139 (MM00036) and the BSC owns Market Message D0383 (MM00370), however, the process obligations are set out in detail in the REC Metering Operations Schedule and referenced by BSCP515

The Proposed BSC Changes to BSCP515 are:

“Section 3.3.A.1 to include the date of D0139 (MM00036) receipt from MOA* (where the MOA energises) as the trigger point for commissioning timescales. It splits out the different trigger points for where the LDSO* or MOA energises.

Section 3.3.A.2 to remove the reference to sending the commissioning information no later than 5WD after commissioning (action 3.3.A.1) and replace it with sending it no later than 21WD after Energisation (if LDSO energises) or 21WD after receipt of D0139 (MM00036) (if MOA energises). This allows extra time for the LDSO to send the D0383 (MM00370) but retain the existing overall timescale of within 21WD of Energisation (where the LDSO energises) and uses the same timescale where or notification of MOA Energisation is via the D0139 (MM00036)”

*For LDSO read DNO and for MOA read MEM - being the REC equivalent terms.

5 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	SELF-GOVERNANCE
RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

The Change is the responsibility of the Metering Expert Panel (MEP), as the affected Schedule is a Category 2 Document for which change control is the responsibility of the MEP.

The Change proposed is a process improvement and does not meet the criterial for an Authority Approved Change, since it does not have a material impact on existing or future energy consumers, nor will it have a material impact on the supply of electricity in Great Britain, and the Change Proposal will not discriminate between parties or classes of parties, therefore it is appropriate for this to be a Self-Governance change,

6 PRIORITY STATUS AND URGENCY

PRIORITY STATUS	LOW
URGENCY	STANDARD

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PRIORITISATION MATRIX

Significance	Score	Weighting
Legal/Regulatory Compliance	1	30
Strategic Direction	0	20
Cost Benefits / Value	0	10
Consumer Impacts	0	30
Operational Efficiency	1	10

Weighted Significance Score	0
Urgency	1
Overall Priority Score	**01**
Effort	0 - Minimal

Urgency

3	N/A	13	23	33
2	02	12	22	32
1	01	11	21	31
0	00	10	20	N/A

Significance

Priority Score	Priority Status
23 - 33	Critical
13 - 22	High
11 - 21	Medium
00 - 10	Low

PRIORITY STATUS
Low

This change is considered ‘Low’ priority based on a significance score of 0 and an urgency score of 1.

The significance score has been determined against the following criteria:

- Legal/Regulatory Compliance – A score of 1 because this change will ensure that where the DNO owns the Measurement Transformers, the DNO reacts and sends

commissioning information relevant to the Energisation of the Metering Point and is not related to an historic date where the unit is pre-commissioned at installation.

- Operational Efficiency – A score of 1 as this change will allow a more efficient approach to be taken to sending commissioning information to the MEM, where units have been installed as pre-commissioned, when the DNO owns the Measurement Transformers. This will help improve the sending of the information by the DNO as the MEM will be appointed at the time the supply is energised, whereas if units are installed in preparation for energisation at a future date, a MEM will not yet be appointed for the DNO to communicate with in the timescales expected of both the REC and the BSCP515.

Urgency – A score of 1 as this change needs to be progressed with a timetable to align with a proposed BSC Change Proposal to co-ordinate the delivery of the change to both change to both codes. As the change does not anticipate changes to Market Messages, it should be targeted to the November 2022 Release.

Effort – A score of Minimal as this Change Proposal does not require further development of the solutions and is being co-ordinated with the BSC to align with their Change Proposal to ensure there is an effective end-to-end solution.

7 SUMMARY OF CHANGE PROPOSAL PLAN

This Change Proposal does not require any further Solution Development or Impact Assessment as the solution is fully formed. As the solution has been developed in co-operation with the BSC and is planned to align with changes planned for BSCP 515, we feel that an Initial Assessment Consultation to assess the impacts and solution options is unnecessary. We propose, with the approval of the Change Panel, to move straight to the production of the Preliminary Change Report (PCR) and issue it for a 15 WD consultation period, following the Change Panel Meeting on the 5 April 2022.

The PCR consultation will seek views from impacted parties on whether this is a process change without system implications, and whether a November 2022 release is suitable.

	FROM	TO
DEADLINE FOR ALTERNATIVE CHANGE PROPOSAL SUBMISSION	08/04/2022	08/04/2022
PRELIMINARY CHANGE REPORT ISSUED	08/04/2022	08/04/2022
CONSULTATION PERIOD	08/04/2022	04/05/2022
FINAL CHANGE REPORT ISSUED	27/05/2022	27/05/2022
RESPONSIBLE COMMITTEE DECISION	08/06/2022	08/06/2022
APPEAL WINDOW CLOSURE	23/06/2022	23/06/2022

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8 GLOSSARY

TERM	DEFINITION
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Measurement Transformers (CT or VT)	means either a Current Transformer (CT) or a Voltage Transformer (VT) or a device carrying out both such functions, whose purpose is to enable the Metering Equipment to operate at a more convenient current and/or voltage than otherwise present
Low Voltage (LV)	means either a voltage exceeding 50 volts alternating current, but not exceeding 1000 volts alternating current or exceeding 120 volts direct current but not exceeding 1500 volts direct current.
Energise/ Energisation	shall have the meaning given under the DCUSA, and 'energised', 'energisation' and similar expressions shall be interpreted accordingly.
Registered Supplier	means, in respect of an RMP and at any time, the Energy Supplier recorded against that RMP in the relevant Switching Data Service at that time with an active registration status (or, in respect of a period of time, the Energy Supplier that had, has or will have an active registration status in respect of that RMP during that period).
Metering Equipment Manager (MEM)	means, as applicable, either: (a) for electricity, the Meter Operator Agent (as defined in the BSC) Appointed by an Electricity Supplier; or (b) for gas, the Meter Asset Manager (as defined in the UNC) Appointed by the Gas Supplier.
Balancing & Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences
Commissioning	commissioning is a process to ensure that the energy flowing across a Defined Metering Point is accurately recorded by the associated Metering System.
Working Day (WD)	means any day other than a Saturday, a Sunday, Christmas Day, Good Friday or a day that is a bank holiday in either or both England and Wales within the meaning of the Banking and Financial Dealings Act 1971.
Retail Energy Code (REC)	means this Code, including its Schedules and the Technical Specification, maintained pursuant to the electricity supply licences granted under the Electricity Act 1989 and the gas supply licences granted under the Gas Act 1986, as such code is modified from time to time in accordance with its provisions.
Market Messages (MM)	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
Metering Expert Panel (MEP)	means, a group of that name established and constituted from time to time pursuant to and in accordance with the Code or any subsidiary document of the Code.