

CP Consultation Responses



CP1530 'Introduction of a formalised process for the validation of measurement transformer ratios by ELEXON'

This CP Consultation was issued on 14 July 2020 as part of CPC00805, with responses invited by 10 August 2020.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
SSE Energy Supply Ltd	1/0	Supplier
Siemens MAS	0/1	Supplier Agent: HHDC, HHDA, NHHDC, MOA
Scottish Power	1/1	Supplier and Supplier Agent
Association of Meter Operators	0/1	Other: Trade Association
SMS Energy Services Limited	0/1	Supplier Agent: NHHDC, HHDC, NHHMOP, HHMOP
E.ON UK	1/1	Supplier and Supplier Agent: MOA
IMServ	0/1	Other: MOP
Western Power Distribution	1/0	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
SSE Energy Supply Ltd	x	x	x	x
Siemens MAS	✓	✓	✓	✓
Scottish Power	x	✓	✓	x
Association of Meter Operators	x	-	-	x
SMS Energy Services Limited	✓	✓	✓	✓
E.ON UK	x	✓	✓	✓
IMServ	x	✓	✓	✓
Western Power Distribution	x	✓	✓	x

Question 1: Do you agree with the CP1530 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
2	6	0	0

Responses

Respondent	Response	Rationale
SSE Energy Supply Ltd	No	We agree that BSC CP1530 would be necessary to introduce new measurement transformer ratios if the corresponding MRA DTC CP 3576 is implemented. However, we do not agree that the DTC CP 3576 provides an adequate solution to prevent incorrect data items being entered in the CT and VT ratio optional fields in flows. We note that the change process for DTC CP 3576 is on hold/deferred since May 2020. On this basis, we do not agree that CP1530 should be approved for implementation until DTC CP 3576 solution has been through the appropriate change process and been approved, as without DTC CP 3576 the CP1530 solution is not required.
Siemens MAS	Yes	Having a standardised data set for CT/VT ratios should reduce confusion and data inaccuracies across the industry.
Scottish Power	No	<p>We agree that the proposal will provide a benefit in valid sets being submitted to and checked by ELEXON, prior to publishing on the ELEXON Portal. Regarding the supporting DTC CP3576, we also see the benefit of Parties being obligated to populate the CT and VT ratios with a value that is present in the valid set. This solution will go some way to improving the data quality within the associated fields and primarily cleansing the mis-use of values such as WC, W/C, -/5, 110 etc however a point to note that mandating a value from a pre-defined list does not make the data more accurate and trustworthy.</p> <p>However, we have concerns that the proposed change does not account for, or give detailed guidance, on scenarios where an invalid combination has been entered and then the incorrect data received by another Party, such as in a Change of Supply scenario.</p> <p>In relation to the supporting DTC CP3576, although agreeing that the proposed change will improve the quality of data going forward from the implementation date, however, we believe that the proposed data cleanse activity would be challenging within the proposed timescales.</p>

Respondent	Response	Rationale
Association of Meter Operators	No	<p>The proposal is to create a list with different codes by each Distributor. This puts an undue burden on stakeholders and is liable to reduce the quality of data within settlement. A single national valid set would reduce the level of error across the industry. Each Distributor and Meter Operator can manage their own systems to have a smaller list that a national list if they wish.</p> <p>Most Meter Operator already have a valid set which is on a national basis, not by Distributor (or GSP Group) therefore they would need to make system changes to fully comply with this valid set. There is no explanation of justification why the valid set needs to be defined by Distributor.</p> <p>It would have been more efficient if this proposal would have been discussed at an increase forum (like TAMEG) prior to being raised so that some of the points identified could have been debated and resolved prior to the formal CP.</p> <p>It is unclear what problem this CP seeks to resolve. Without a clear definition of 'the problem' it is not clear whether the proposed solution will actually address the issue.</p> <p>Currently the D0268 is sent by the Meter Operator to the Distributor. This flow includes the CT & VT ratio. There is no requirement in the BSCP for the Distributor to review this flow, compare the ratio communicated and to its records and to highlight if there is a difference. Making this change might actually highlight further problems or inconsistencies.</p>
SMS Energy Services Limited	Yes	We agree with the CP1530 solution.
E.ON UK	No	<p>We do not agree with the proposed solution for the following reasons:</p> <ul style="list-style-type: none"> • Publishing the valid set in the Elexon portal is likely to create a new problem albeit by exception, in instances where a completely new CT/VT value is installed/found on site that doesn't match the valid list. It is not clear how the proposed Elexon portal page will be managed/maintained – the CP states Elexon will update this from 'time to time', however if it's anything like the MDD updates and release process then it's not quick enough in comparison to the timings that the associated dataflows SLA's (particularly given CP1532) taking about month on

Respondent	Response	Rationale
		<p>average to be released onto the Elexon portal. This will leave Suppliers & MOAs with either:</p> <ul style="list-style-type: none"> ○ inaccurate MTD's through using the 'unknown' ID listed in attachment C (the proposed valid CT/VT dataset) being issued, or; ○ No CT/VT data values populated in the MTDs (which can lead to the wrong Measurement Class being assigned, causing network charging and settlement inaccuracy). <ul style="list-style-type: none"> • Placing obligations solely on the LDSO to submit CT/VT ratio data set would also be restrictive in the resolution of the above-mentioned exceptions – it is known that LDSO's subcontract CT/VT installs in most cases and installs of CT/VT's is a contestable work item for LDSO, so competition in connection rules means that non industry parties can install them for any connection nationwide. In practice LDSO's only know the CT/VT ratio when part 1 commissioning information is available which is populated in the initial D0383 on new connections only. • The CP lists 4 Settlement Risks impacted by this change and whilst 3 are the impacted, I don't think this improves or mitigates the settlement risks. We feel that this change is neutral against these SRs for all except for SR003 SVA Risk which our opinion should not be included as impacted because that relates to a physical meter not correlating to the CT/VT's applicable on site, resulting in under or over recording. Therefore, the root cause of SR003 is due to inaccurate or incomplete commissioning of the metering system as opposed to inaccurate standing data. • There is also a question of who should raise changes wherever CT/VT ratios are found to be in use that are not listed in the valid dataset, and when the relevant market participant should raise the change to Elexon, without this clarification there could be prolonged periods of time whereby inaccurate MTD's exist that could be lost when CoA/CoS occur. This could be problematic once live as the Elexon portal page being updated from 'time to time' does not give MOA's an indication when and how they will receive data refreshes, whereas MDD updates are expected on cyclic basis and it's also

Respondent	Response	Rationale
		<p>subject to version control so assures parties and party agents are uploading the latest dataset. Whilst I don't expect data refreshes being a common event so shouldn't be calendar driven how maintaining and updating the valid dataset will work is unclear so needs further thoughts.</p> <p>Given the rationale for change is data quality driven we think the proposed reason for change is better facilitated though a single DTC CP that appropriately updates Annex C Dataflow Completion Rules in the DTC because:</p> <ul style="list-style-type: none"> ○ Part of the reason for change outlines that the current CT/VT J-items do not restrict the type of characters that can be entered allowing for obviously incorrect CT/VT values 'such as 'w/c' or '999' in the dataflows. ○ Conversely the existing Annex C flow completion notes do not offer any guidance on populating CT/VT values in any of the notes associated to the D0268,D0150 & D0313 Dataflows suggesting there isn't appropriate guidance on what to populate, which is a more likely reason for obviously incorrect CT/VT values appearing in MTD's. <p>This would be more cost-effective solution to the data quality issue cited as it would reduce the cost & effort without the need to implement a restrictive valid dataset within the existing J-items.</p>
IMServ	No	<p>I have concerns about the list of Valid Transformer Ratios (v1.0), at a glance it's clear that there is a significant number of CT ratios missing across numerous DNOs. Possibly some DNOs have provided lists of the CT/VTs they currently install and have not considered the entire population of CT/VTs which exist in their areas.</p> <p>If we have missing CT/VT ratios the impact will be felt by the MOPs, Suppliers and DCs as we will be unable to send/receive MTDs where CT/VTs are missing on CoA/CoS. When this happens, I expect MOPs will need to contact Suppliers who in turn will need to contact the DNOs, who will then follow the new process documented in BSCP515, this additional handling times could result in a large quantity of 'stuck' MTDs for several weeks, or based</p>

Respondent	Response	Rationale
		on experience of similar such issues, month. The impact to Settlement could be significant.
Western Power Distribution	No	<p>We are supportive of the valid list of CT/VT ratios being held by Elexon and made available via the Elexon portal. However the CP is not clear on the process for the maintenance of this valid set and we therefore have concerns that the change proposal is not a complete solution.</p> <p>The proposed process in BSCP 515 is silent on the process where a CT and/or VT ratio is removed from the valid set and the notification to industry parties affected by that removal. We would suggest that a formal change process or notification that a CT and/or VT ratio is to be removed with sufficient lead time to enable parties to make the necessary system changes.</p> <p>The change proposal is also silent on any obligation for the LDSO or MOA to validate the CT and/or VT ratio against the valid set.</p>

Question 2: Do you agree that the draft redlining delivers the CP1530 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5	3	0	0

Responses

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

Respondent	Response	Rationale
SSE Energy Supply Ltd	Yes	None provided.
Siemens MAS	Yes	<p>However, there are a couple of points that need further clarification</p> <p>1) There is no proposed change noted for the DTC J Item J0454 - CT Ratio character length currently set at CHAR(6). In the proposed list of CT ratios there is a value of "UNKNOWN" at 7 Characters suggests a change is required to the Flow? This would impact whether Siemens MAS would need to implement System changes.</p> <p>2) Are MOP's and DC's going to be required to validate CT and VT ratios against this data set when processing or Generating Data Flows?</p> <p style="padding-left: 40px;">i) What is the consequence of a MOP or DC of populating a Data Flow with a CT or VT ratio not in the data set?</p> <p style="padding-left: 40px;">ii) What is the process if a party receives a Data Flow with a CT or VT Ratio not in the data set? Are Data flows to be rejected?</p> <p>3) Will all industry parties be expected to cleanse current CT/VT ratio data if it does not align to the standardised list?</p>
Scottish Power	yes	We agree that the draft redlining delivers the proposed changes for CP1530 for the LDSO to support this proposal but as above mandating from a predefined list will not necessarily make the data correct just remove erroneous noise that already exists within these fields.
Association of Meter Operators	No	There is no clarity in the proposal of how Customer Owned CT/VTs which have a different ratio to that

Respondent	Response	Rationale
		<p>recognised in the valid set are added to the valid set. The only route described is for Distributors to add to the valid set.</p> <p>There is no mechanism for how a subsequently identified invalid ratio is removed from the valid set.</p> <p>There is no clarity of how updates to the valid set are communicated to industry.</p> <p>There a no changes proposed to the BSCP514 – Meter Operation. So there is no clarity what should occur if a Meter Operator receives a value which is not included in the valid set, either from a Distributor or from an outgoing Meter Operator. Should they use the value (as now) or reject the information. There is no defined mechanism to reject the information. Rejecting the information would leave the receiving Meter Operator uncertain of how to progress.</p> <p>There is similar uncertainty for a HHDC – although they have no direct use of the data item in the D0268 so they probably need to use the data flow whatever the CT & VT field are populated with.</p> <p>The proposed red line drafting uses multiple footnotes. I understand that ELEXON have been seeking to reduce or eliminate the use of footnotes as they lead to ambiguity about their governance.</p> <p>The BSCP515 drafting indicates that ELEXON may reject applications for changes, although the BSCP does not explain on what criteria acceptance or rejection will be based.</p>
SMS Energy Services Limited	Yes	None provided.
E.ON UK	Yes	Whilst we agree the redlining delivers the requirement change, for the reasons stated above we do not support the implementation as we believe the issue at hand can be better facilitated elsewhere.
IMServ	No	I believe that managing and validating the list of CT/VTs at DNO level is unnecessary. It adds additional cost and complexity in respect to software development and management, but it also increases the likelihood of us having missing (valid) CT/VT ratios in the valid set. Given that most CT/VT ratios exist in most DNO areas I don't believe

Respondent	Response	Rationale
		the extra complexity offers any benefits over a single national CT/VT valid set.
Western Power Distribution	No	<p>Although the red-lining delivers the CP1530 proposed solution, as stated above, we believe the solution is not complete.</p> <p>In addition, the original BSC CP 1496 referenced a footnote in BSCP514 against Action 5.2.2.A.2 <i>"DAXXX Notification of commissioning information contains BSCP maintained valid sets for measurement transformer ratios. For updating these valid sets with additional ratios go to section BSCP515 3.15"</i>. We would therefore suggest that this footnote or similar be added to BSCP 514 to make MOAs aware of the valid set.</p>

Question 3: Will CP1530 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
6	1	1	0

Responses

Respondent	Response	Rationale
SSE Energy Supply Ltd	No	None provided.
Siemens MAS	Yes	<p>This depends on the response to the points for clarification raised in question 2.</p> <p>If J Item J0454 is to change to 7 characters, then Siemens MAS will need to make changes to both our DC and portfolio systems to extend the CT ratio field length. There would also be a minor impact to the field mobility systems to extend the length of the CT Ratio Fields captured by field operatives.</p> <p>There is also a potential impact on the programming software the field operatives utilise whilst carrying out installs and meter maintenance work. These may need to be updated in line with the standardised list.</p> <p>Where MOP's are required to validate these ratios going forwards additional system changes would be required to ensure values entered fall within the valid data set. Along with this there would be the potential requirement to make changes to data flow processing to accept/reject flows with J Items J0454 and J0455 populated.</p>
Scottish Power	yes	<p>As outlined above, we do not see enough detail in the proposal to indicate that we would not inherit erroneous data. Regarding the supporting DTC CP3576 change and the proposed data cleanse activity to improve data quality, we believe that not all cleansing will be able to be completed as a desk top exercise, which will in turn require a visit to site to establish the correct metering details. In some instances this may require more than one site visit.</p> <p>As there are already existing metering resource challenges - due to post Covid-19 remobilisation, SMART roll out and AMR installation obligations – we believe that we would be constrained in supporting this activity to the proposed timescales.</p> <p>Having better quality data will allow us to better service customers (i.e. ensure that the appropriate qualified metering agents/engineers visit etc) and</p>

Respondent	Response	Rationale
		allow us to undertake our obligations with greater effect and efficiency however without a back population / full data cleanse of erroneous and poor historical data, this benefit will not be fully realised.
Association of Meter Operators	No response	My response is on behalf a trade association, so not directly
SMS Energy Services Limited	Yes	CP1530 will require system and process changes to ensure that we adhere to the fixed transformer ratio's.
E.ON UK	Yes	This will have system impacts on the metering businesses (both NHH & HH) if approved, as they will need to ensure they have the latest valid dataset in systems when producing any related dataflows within the supplier hub. We also believe that processes across the supplier hub will need to be visited to facilitate this CP.
IMServ	Yes	The most significant impact for us would likely be: <ol style="list-style-type: none"> 1) Software changes and associated costs would be required to prevent MOP from processing MTDs where the CT/VT ratios are not in the valid set. 2) Ongoing manual process to monitor CoA/CoS events were we are unable to send/receive MTDs due to missing values in the valid set and the onward process for attempting to get missing ratios added. It is estimated that these would be frequent and tiresome to resolve.
Western Power Distribution	Yes	System changes will be required to incorporate the valid set held on the Elexon Portal into our internal processing systems. If the LDSO is required to validate CT and/or VT ratios against the valid set, further system changes will be required to build the validation and an exception process would be required.

Question 4: Will your organisation incur any costs in implementing CP1530?

Summary

Yes	No	Neutral/No Comment	Other
6	1	1	0

Responses

Respondent	Response	Rationale
SSE Energy Supply Ltd	No	None provided.
Siemens MAS	Yes	The extent of the cost to implement CP1530 would depend on the response to the points for clarification raised in question 2.
Scottish Power	yes	Not as part of CP1530, but as highlighted in our other responses we would incur costs for any site visits that would have to be carried out in support of the data cleanse activity, in addition implementation of new validation routines to identify poor quality data from agents and associated resources to manage.
Association of Meter Operators	No response	My response is on behalf a trade association, so not directly
SMS Energy Services Limited	Yes	One off cost related to system, document and process updates; actual cost has yet to be determined.
E.ON UK	Yes	We believe the costs to implement will be small, as minor system changes have been identified, however we believe that solution is overly complicated, and can the defects can be addressed without creating costs for market participants.
IMServ	Yes	Software development for new validation rules
Western Power Distribution	Yes	In order to accommodate the system changes and build the validation process one off costs will be incurred and if a validation process is required ongoing costs will be incurred to operate the exceptions process.

Question 5: Do you agree with the proposed implementation approach for CP1530?

Summary

Yes	No	Neutral/No Comment	Other
4	4	0	0

Responses

Respondent	Response	Rationale
SSE Energy Supply Ltd	No	As per our response to Q1, we note that the corresponding MRA change DTC CP 3676 has not completed the change process and is currently deferred. We do not agree that CP1530 should be approved for implementation until DTC CP 3576 solution has been through the appropriate change process and been approved, as without DTC CP 3576 the CP1530 solution is not required.
Siemens MAS	Yes	However, further clarity is required to the wider impact of this change to Data Flow processes for MOP's and DC's. Additionally, Will other non LDSO parties be able to raise queries on the standard data set, such as a missing value?
Scottish Power	No	We understand the logic for both changes – CP1530 and CP3576 – at the same time that CP3572 will implement changes to the D0268 flow, however, as in our response above, we foresee challenges in supporting the delivery.
Association of Meter Operators	No	As discussed at length at IREG, prior to implementation a data cleansing exercise should occur. The intention would be to remove as much erroneous data from stakeholder systems prior to implementation. Otherwise the 'good industry players' will clean up the data while the 'poor industry players' will simply continue sending erroneous data. A cleaning exercise would reveal the accuracy, or not of the proposed valid list. Cleansing and updating of the proposed valid list should progress with this CP 'put on hold' until complete. Anecdotal evidence from Meter Operators is that the HH population is more accurate than NHH portfolio. This makes sense in that the HH portfolio has probably been more activity in changing Meter

Respondent	Response	Rationale
		<p>Operator, changing meters and updating the MTD correctly.</p> <p>If the CP is approved, then the proposed list of valid codes should be published immediately so that a cleaning activity can commence. Distributors should update the valid list with any amendments prior to any formal implementation date.</p> <p>The MRA change could be progressed and implemented with the formal BSC valid set to 'any CHAR(6)' as per the current usage. Then the BSC valid set can be refined and implemented as proposed at a later date.</p> <p>Including in the valid set a date to show what has changed is essential.</p>
SMS Energy Services Limited	Yes	None provided.
E.ON UK	Yes	We agree with the implementation approach.
IMServ	Yes	None provided.
Western Power Distribution	No	Whilst we are supportive of this change, we would prefer a June 2021 implementation date.

Question 6: Do you believe that there are any additional CT/VT ratios which should be included in valid set compiled by ELEXON under this Change Proposal?

Summary

Yes	No	Neutral/No Comment	Other
3	5	0	0

Responses

Respondent	Response	Rationale
SSE Energy Supply Ltd	No	None provided.
Siemens MAS	No	Not at this time.
Scottish Power	No	None provided.
Association of Meter Operators	Yes	<p>The list does not appear to be complete. As an example:</p> <p>VT list - It is difficult to believe that Eastern (10) and Seeboard (19) do not have any 33kV metered customers (they did when I worked for them), but they do apparently have 3.3kV customers which other Distributors do not.</p> <p>CT list – the absence of 1amp secondaries in many Distributors valid sets seems unlikely when these exist in other areas. The use of 1amp secondaries seem to have increased in recent years.</p> <p>Has this list been compared with the information extracted by ELEXON to verify the use of these ratios against the actual data flows circulating within the industry? ELEXON have checked the ratios several times over the years so a 'actual' valid set should exist.</p> <p>The differences in the list across various Distributors is a concern. The industry has used similar equipment for 80+ years. The CT/VTs are equipment that will remain in use for many years. I would suggest that the longer lists of valid sets are probably actually in use by all the Distributors. As a result, there is probably actually minimal difference between the 14 historic Distributors, although the IDNOs with newer installations may have a smaller range.</p>

Respondent	Response	Rationale
		<p>The three UKPN areas have the same short CT list. Which may reflect their current new installations, but they actually have a legacy of many other ratios. Including in London a legendary obscure CT ratio which is apparently unique to London but is not listed.</p> <p>Over years I have struggled to get clarity on the correct ratio for nominal 25kV Network Rail supplies. But it is notable that some Distributors list 26400/110, whereas others identify 25000/110 and many do not include anything similar.</p> <p>Similarly, the entry referencing 6600/100 may be an error. Most secondary voltages are quoted as 110volts, so this entry is worth checking.</p> <p>The presentation of the information on the spreadsheet is not clear or conducive to loading into a system. A better presentation may be a column of all the codes and the Y in which Distributor uses the value.</p>
SMS Energy Services Limited	No	We do not understand why there are unknown values in the list as this list should be a definitive list of known ratios.
E.ON UK	No	None provided.
IMServ	Yes	I believe most DNO areas are missing some common CT/VTs, in particular areas 10, 12, 19 are missing a significant number of ratio's, for example none of these areas have CT Ratio 25/5 and 50/5 which are common CT ratios for HV sites.
Western Power Distribution	Yes	We have reviewed the list of CT and VT ratios in respect of our distribution areas and have amended accordingly. The revised spreadsheet is attached with this Change Proposal Response.

BSCP515

Respondent	Location	Comment