

Second CP Consultation Responses



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

The second CP Consultation for CP1530 was issued on 12 October 2020 as part of CPC00808, with responses invited by 6 November 2020.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Siemens MAS	0/1	Supplier Agent: MOA, HHDC, NHHDC
IMServ	0/1	Supplier Agent: MOP
Association of Meter Operators	0/1	Trade body
Scottish & Southern Electricity Networks	1/0	Distributor
E.ON energy solutions	1/1	Supplier/Supplier Agent: NHHMOA, HHMOA
SMS Plc	0/1	Supplier Agent: HH, NHH MOP, DC, DA
Western Power Distribution	1/0	Distributor
Northern Powergrid	1/0	Distributor
Scottish Power	0/1	Supplier Agent
Callisto (formerly Morrison Data Services)	0/1	Supplier Agent: MOA, NHHDC, NHHDA, HHDC, HHDA

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Siemens MAS	✓	✓	✓	✓
IMServ	✓	✓	✓	✓
Association of Meter Operators	✓	-	-	✓
Scottish & Southern Electricity Networks	✓	✓	✓	*
E.ON energy solutions	✓	✓	✓	✓
SMS Plc	✓	✓	✓	✓
Western Power Distribution	✓	✓	✓	✓
Northern Powergrid	*	✓	✓	*
Scottish Power	*	✓	✓	✓
Callisto	✓	✓	✓	✓

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

Summary

Yes	No	Neutral/No Comment	Other
8	2	0	0

Responses

Respondent	Response	Rationale
Siemens MAS	Yes	Having a standardised data set for CT/VT ratios should reduce confusion and data inaccuracies across the industry.
IMServ	Yes	We believe the revised draft resolves the key issues.
Association of Meter Operators	Yes	While it does not assure the accuracy of the CT or VT ratio for any particular site but it does reduce the opportunity for erroneous values and focuses stakeholders on use of valid values.
Scottish & Southern Electricity Networks	Yes	Removes ambiguity from entered values that do not truly denote the connected ratio.
E.ON energy solutions	Yes	<p>Whilst E.ON agree that several concerns raised by us and other market participants have been considered which have improved the proposed solution following the 1st consultation, we feel that the revised solution offers a limited benefit in so far as assurance that parties populating the CT/VT ratios will use a valid defined dataset held within industry standing data.</p> <p>E.ON believes that the solution does not improve the accuracy of CT/VT values overall and consequently only offers a small improvement to the defect detailed in the original Change Proposal regarding data quality and the associated settlement risks.</p>
SMS Plc	Yes	Overall we agree with the solution, however, clarification over when MOAs set the CT/VT ratio to unknown is required; setting it to unknown on receipt of MTDs prior to LDSO confirming and request for it to be included in the Valid set goes to Elexon, increases manual editing of MTDs for MOAs.
Western Power Distribution	Yes	We are supportive of the valid list of CT/VT ratios being held by Elexon and made available via the Elexon portal. We note that the amendments made

Respondent	Response	Rationale
		<p>to the proposal in the second consultation have addressed our concerns in respect of providing a lead time should a CT and/or VT ratio be removed from the valid set enabling parties to make the necessary system changes.</p> <p>We note however that the consultation states that there is an expectation for the recipient to validate the CT and/or VT ratio against the valid set. We still feel that there is not a specific obligation on either the LDSO or MOA to undertake this validation. The obligation is on the LDSO or MOA to ensure that they populate the correct CT or VT ratios and the Performance Assurance should be against that risk not on parties validating the data.</p>
Northern Powergrid	No	<p>We agree with the rationale for this change but are not in agreement for one party to effectively police the validity of the data within the CT (J0454) and VT (J0455) data items sent by another party – as referenced in section 4.4.2 of the BSCP 515 and section 1.1 of BSCP 514. We believe the onus must be on the sending party to ensure that the data sent within the flow is valid. To 'contact' the sender if there is an invalid value will be a manual task and one we fear will occur far too often. Therefore, either there should be a requirement to ensure systems are configured so they cannot send invalid data or a rejection flow should be created.</p>
Scottish Power	No	<p>We agree with that the proposal is trying to do the correct things in looking to reduce the number of invalid ratios being issued by MOPS, however, we also believe that this solution does not provide assurance but reduces the potential for issues.</p> <p>As a Supplier Agent we would prefer that the issuing party carry out validation on the CT/VT ratios prior to issuing to recipients, so that the recipient does not have to validate the data set and amend to 'unknown' but understand that this is not an option. In this case we would expect that the receipt of any Meter Technical Details carrying incorrect information – as defined in MRA Annexe C – should be processed via industry data flows and, as such, the MTDs rejected once validated as incorrect or sit as incorrected.</p> <p>In addition, we believe that there is a risk to setting the data set to 'unknown', where a recipient has received it and has then resulted in sending on to</p>

Respondent	Response	Rationale
		another party. We believe that there is risk in the proposal not providing enough control around the process and we would like to see clarify being provided on how these instances are managed in relation to SLAs for parties to respond to issues highlighted, along with clear guidelines in order to resolves issues, as these are not clear in the proposed BSCP514 redlining.
Callisto	Yes	<p>Maintaining a valid set of CT and VT ratios and requiring these to be validated against will improve the data quality for these items.</p> <p>These values seem like they should be part of MDD or defined in the DTC rather and being an independent list accesses in another way. We can understand that it is more cost effective to create this new list in this way (compared to adding it to MDD), and particularly making changes to the MDD data flows, although not all MDD data is included in the data flows currently. However this data clearly would fit with MDD or a DTC valid set.</p> <p>It is also not clear what the authorisation process is within BSC/Elexon.</p>

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

Summary

Yes	No	Neutral/No Comment	Other
8	2	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
Siemens MAS	Yes	We are pleased that the comments raised in the previous consultation have been addressed.
IMServ	Yes	Yes, the draft is acceptable.
Association of Meter Operators	Yes	The changes since version 1 are a material improvement.
Scottish & Southern Electricity Networks	Yes	Where ratio is not listed in the valid set should an alternate to 'unknown' be used to recognise the ratio is known but not listed?
E.ON energy solutions	Yes	None provided.
SMS Plc	No	As noted in our response to question 1, clarification around the process of marking CTs/VTs as unknown is required to prevent repeated manual intervention of MTDs by the MOA. Can you confirm if the setting of CT/VT values to unknown is to prevent the MTDs being held up by MOA until the ratio has been confirmed/added to the list? If so, has consideration being given to how multiple issuing of MTDs with the same EFD but updated Key Fields will affect HM13.
Western Power Distribution	Yes	We agree that the draft redlining on both BSCP 514 and BSCP 515 delivers the proposed solution with the exception of being silent on any obligation for the LDSO or MOA to validate the CT and/or VT ratio against the valid set.
Northern Powergrid	Yes	The draft red-lining does deliver the proposed solution. However, as explained in Q1, we do not agree with the proposed solution.

Respondent	Response	Rationale
Scottish Power	Yes	Yes, but as per our response to Q1 we do not support the change.
Callisto	No	<p>We agree largely with the redlining. Below are the points we would make in.</p> <p>BSCP514 1.1 and BSCP515 4.4.1 'J0454 – CT Ratio' and 'J0455 - VT Ratio' – this should be and/or</p> <p>BSCP514 section 3 looks like it should be titled Interface and Timetable and Information. In line with other similar questions.</p> <p>BSCP514 and BSCP515 – in both documents it needs to be clear at which point in the process the changes become valid, we assume this is when the list is published on the portal.</p> <p>Although possibly unnecessary it is probably worth clarifying the list of valid values can be used in a flow from the date of publishing i.e. the value can be used for retrospective dates.</p>

Question 3: Will CP1530 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
9	0	0	1

Responses

Respondent	Response	Rationale
Siemens MAS	Yes	There will be a MOA change to only populate the new values, and to validate data received from other parties. We are pleased that the CT value will remain limited to six characters (it was seven in the previous proposal) as this will remove the impact on DC. A data cleanse activity is needed for currently held values that are not on the new data set.
IMServ	Yes	The most significant impact for us will be: 1) CT/VT Data cleanse activities to be completed prior to June 2021 2) Wheatley MOP software changes will be required to prevent MOP from processing MTDs where the CT/VT ratios are not in the valid set. 3) Ongoing manual process to monitor CoA/CoS events where we are unable to send/receive MTDs.
Association of Meter Operators	No response	It will impact all metering companies
Scottish & Southern Electricity Networks	Yes	Changes will be required to systems used to create industry flows.
E.ON energy solutions	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, along with conducting a data cleanse to ensure that the relevant metering portfolios align to the valid set. We also believe that processes across the supplier hub will need to be considered to facilitate this CP, which may need to be worked through outside of traditional process, for example supporting the resolution of metering systems where the CT/VT

Respondent	Response	Rationale
		value is not known and cannot be resolved without site visits.
SMS Plc	Yes	<p>MOA:</p> <ul style="list-style-type: none"> Process documentation updated to include new BSCP requirements. System Validation updates. System Standing Data update. Data cleanse of currently held CT/VT information; on site and remotely <p>DC:</p> <ul style="list-style-type: none"> System Validation updates. System Standing Data update.
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.
Northern Powergrid	Yes	Significant data cleansing would have to be done to ensure all the CT and VT ratios are valid and in the correct format. In addition, there would need to be significant system changes to accommodate the change. Both of these items would require resourcing.
Scottish Power	Yes	<p>The proposed change would require to be supported by IT development to validate, and report on the MTDs received from sender.</p> <p>There would also be an element of manual processing to inform the sender/LDSO and Elexon via email for resolution should a data set be amended to 'unknown' in the proposed solution. There would also have to be a process developed to monitor these instances to manage through to resolution.</p>
Callisto	Yes	As a MOA we will need to carry out the data cleansing activity on our existing meter data, this will result in updated MTD being issued where the data is amended.

Respondent	Response	Rationale
		We will need to amend our system validation to apply a check against the new valid set both for incoming and outgoing flows.

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

Summary

Yes	No	Neutral/No Comment	Other
9	0	0	1

Responses

Respondent	Response	Rationale
Siemens MAS	Yes	One-off system changes, plus the data cleanse.
IMServ	Yes	Wheatley MOP software changes will be required, Wheatley Associates will need evaluate the change before estimating the cost for the work.
Association of Meter Operators	No response	It will impact all metering companies in system changes and/or cleansing exercises
Scottish & Southern Electricity Networks	Yes	Changes to systems will become an IT project to implement the required changes. The costs incurred could not be established due to remote working and other priority work.
E.ON energy solutions	Yes	We believe the costs to implement will be small, as minor system changes have been identified, in principle this should be limited to creating the valid CT/VT data set in our MOA system and ensuring that the relevant dataflows only allow use of that data set when generating the associated dataflow. We also believe we would incur a small one-off cost for initial data cleanse of the NHH & HH portfolio.
SMS Plc	Yes	One-off costs relating to system, document and process updated. Additional costs incurred for onsite CT/VT data cleanse activities.
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.
Northern Powergrid	Yes	<p>There would be a cost associated with the system changes which will be a one-off. One-off costs could also be incurred for the data cleansing exercise if additional resource is required.</p> <p>If the policing of the data validity would rest with the recipient (as per the proposal) and cannot be automated, there is likely to be ongoing resource costs for this aspect.</p>

Respondent	Response	Rationale
Scottish Power	Yes	<p>Yes, we will incur costs to develop the IT solution to support the changes.</p> <p>There will also be a cost associated as part of the data cleanse activity, should site visits be required to establish the correct metering details.</p> <p>The also associated cost for resource to manage the new manual part of the process and controls.</p>
Callisto	Yes	<p>There will be an initial cost to carry out the system changes and data cleansing activity. There will be a smaller ongoing cost to deal with exception from the new validation.</p> <p>At present we do not have estimation of these costs.</p>

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

Summary

Yes	No	Neutral/No Comment	Other
8	2	0	0

Responses

Respondent	Response	Rationale
Siemens MAS	Yes	None provided.
IMServ	Yes	None provided.
Association of Meter Operators	Yes	Certain members have expressed the view that they could implement changes earlier than the Jun 2021 date, subject to making the necessary changes and cleansing their portfolio
Scottish & Southern Electricity Networks	No	If costs for system changes become excessive there will delays implementing system changes prior to June 2021 implementation.
E.ON energy solutions	Yes	None provided.
SMS Plc	Yes	Allowing 6 months for data cleanse is beneficial, however, it is worth noting issues may arise for on-site visits due to possible ongoing covid-19 restrictions.
Western Power Distribution	Yes	We note that this second consultation has extended the implementation to June 2021. However, if cleansing of existing data is required we would be unable to complete this cleansing by the extended implementation date and would require a longer lead time to comply with any cleansing requirement.
Northern Powergrid	No	In addition to our comments in Q1, we consider the implementation in June 2021 to be too soon. There are a number of other IT changes and code activity in the pipeline for projects such as Faster Switching Programme, Targeted Charging Review, Access SCR, and Mandatory Half Hourly Settlement (MHHS) among others. For any standard IT change there is usually a 6-month implementation period allowed so, by also factoring in the time this change will take to progress through to possible acceptance together with all the other IT projects and the impact on businesses due to COVID-19, we consider

Respondent	Response	Rationale
		<p>November 2021 is a more realistic and manageable target date.</p> <p>However, the data cleanse is achievable before June 2021.</p>
Sottish Power	Yes	Yes, but as per our response to Q1 we do not support the change.
Callisto	Yes	The lead time to develop changes and the early notice of the valid set will enable the data cleansing activity to be completed before the implementation.

Question 6: How much work would be required to carry out a full data cleanse of invalid ratios prior to the requirement to use the valid set in June 2021, when CP1530 will be implemented?

Responses

Respondent	Response	Rationale
Siemens MAS	TBC	Please provide guidance for the data cleanse. How far are we allowed to manipulate invalid ratios? Can we make a best guess, or do we default to 'unknown'? If MOA changes the ratios during the data cleanse, we assume we don't need to trigger a new D0150 or D0268?
IMServ	Est 10 man days	<p>At IMServ we believe CT/VT data cleanse activities will be a phased approach, it may look something like this:</p> <p>Phase 1) Identify all the Whole Current meters in our portfolio where erroneous CT/VT ratios have been populated, then delete these values from the database. Use supporting information to identify W/C meters i.e. Outstation type, current rating, meter certificates and the existing CT/VT values i.e. W/C or 999</p> <p>Phase 2) Identify all CT/VT meters where the CT/VT ratios held are not in the required format, for example 200:5 or 11Kv/110. Convert erroneous values into valid MDD formats i.e. 200/5 or 11000/110</p> <p>Phase 3) For CT/VT meters which remain, but the ratio(s) held don't give a clear indication of the actual ratio (i.e. 000/5 or 00000/110) and no evidence to confirm the actual ratio is available then the CT/VT values will be changed to 'UNKNOWN'.</p> <p>Phase 4) Where 'UNKNOWN' values remain an investigation will be required to identify the actual ratios, investigations will likely be ongoing after CP1530 go-live.</p> <p>We expect HH & NHH data cleanse activities to be carried out at the same time, there is no requirement for us to separate the activities, however the quality of CT/VT data in the HH market</p>

Respondent	Response	Rationale
		is significantly better than the NHH market. We also expect that CT and VT data cleanse activities will be carried out at the same time.
Association of Meter Operators	No response	<p>This depends on the definition of "full data cleanse". The focus of the CP is to introduce a valid set of CT & VTs, everything not on the valid set is deemed to be invalid. Therefore, the essential activities are to verify the published list is accurate – see answer to Question 8. Then to review the portfolio to identify and remove any invalid entries.</p> <p>Following the portfolio data cleanse there is no requirement on Meter Operators (or LDSOs) to update the MTD to Suppliers, LDSOs, SMRS, etc. Any changes to CT/VT ratio are not used by any participant until there is a trigger event, such as change of agent or change of metering.</p> <p>If the MTD were resent than HHDCs would need to reprocess the data, it would adversely impact the PARMs reports and would be perceived as a 'key field' change potentially triggering a proving test – none of which add any value.</p> <p>As the change impacts the D0150 and D0268 the impact of this change is with every meter operator whether they operate in the NHH or HH market. It will require all meter operators to cleanse their portfolio of all erroneous values.</p> <p>Whereas if a LDSO identified that a previous D0215 (or similar) flow had erroneously been sent for a CT connection than it should be a requirement to send the Meter Operator with a new D0215 identifying the correct ratio.</p> <p>In the absence of an ELEXON co-ordinated cleansing exercise, the AMO is seeking to work with members to develop a best practice approach to the cleansing activity drawing on the expertise within the membership. For example, a simple cleansing process could simply replace everything in the portfolio with 'unknown' if the value is not on the valid set, however within the information there are examples of ratios quoted as 500.5 which can be modified to 500/5 and retain the intelligence.</p>
Scottish & Southern Electricity Networks	Unknown	It is not envisaged a large amount of work is required to cleanse existing data, however the required work will not be fully understood until a IT project commences.

Respondent	Response	Rationale
E.ON energy solutions		<p>Section 8 of the consultation document “Elexon notes that a full data cleanse at this stage is not required as the valid list must only be used from the proposed go-live date of the DTC CP”, suggesting that there is no requirement to issue updated MTD’s once the erroneous value is corrected by the MOA within their systems which only mean that an erroneous value becomes apparent to the supplier hub as and when a requirement to issue revised MTDs arises (I.E CoA/CoS).</p> <p>We believe that an initial data cleanse to identify the obvious errors (e.g “W/C” or “999” values) cited in this CP and correct to either an unknown or confirmed CT/VT value would not be overly onerous on parties, however we believe that this approach would be sub-optimal and may actually adversely impact settlement risks and have a negative impact on DUoS billing due the relationship between the assigned measurement class allocations between CT & Non-CT metering systems used to charge DUoS. Suppliers are responsible for ensuring data accuracy, but there are no clearly defined requirements to ensure that the supplier hub is duly informed through MTD updates that changes to CT/VT ratio values have been made, or by other means.</p> <p>Conversely any corrections that result in MTDs being corrected and sent to the supplier hub as part of the data cleanse will adversely affect PARM’s reporting exceptions as and when the data is corrected and revised MTDs are issued, which perversely incentivises MOA’s to make the corrections without issuing MTDs and only notify the supplier hub of the change when a significant event a determines that the MTDs need to be issued.</p> <p>For these reasons we do not feel that we can offer an appropriate response to this question as it is not known what is meant by a full cleanse of invalid ratios based on the current information available. E.ON recommends that Elexon consider further what should be carried out as part of any data cleansing and how it should be managed to ensure consistency over the cleansing activity in order to promote clean data being shared across market participants.</p>
SMS Plc	Yes	The ongoing covid-19 rolling lockdowns will continue to be a barrier to completing the required onsite visits. Additionally, due to the issues experienced by all in 2020, companies continue to

Respondent	Response	Rationale
		divert resource to catch up on smart meter rollout requirements.
Western Power Distribution	Other	Without having sight of the final CT/VT valid set it is difficult to assess how much work would be required to carry out a full data cleanse of invalid ratios. As has been highlighted previously, industry parties are currently committed to the faster switching programme and therefore have limited resources if cleansing was required by a June 2021 target date.
Northern Powergrid	Other	Data cleansing of invalid ratios will be an office based task. It will be largely be a task to amend the format of the ratios in our database to ensure they in the correct format. However, there is likely to be a significant number of sites in our database where this simple conversion will not be possible due to too much ambiguity or the ratios are not on the valid list. These will take a considerable amount of administration time and effort to address. We don't have a view on the number of these in this category yet.
Sottish Power	Other	<p>As part of this activity we would require a definition of what is to be identified as "invalid" in relation to what is to be identified as "erroneous".</p> <p>To carry out the cleanse we would have to conduct desk top analysis to categorise as invalid and erroneous. Once invalid data has been identified we would have complete further desk top analysis against the valid data set as published by Elexon. Where we are unable to cleanse in this way, we would have to potentially visit the site to confirm the details at the premise. It is difficult to determine how much time this will take until have a clear understanding of the definition for "invalid" and "erroneous"</p>
Callisto	No response	No response

Question 7: How much work would be required to carry out a full data cleanse of erroneous ratios prior to the requirement to use the valid set in June 2021, when CP1530 will be implemented?

Responses

Respondent	Response	Rationale
Siemens MAS	TBC	Please provide guidance for the data cleanse. How far are we allowed to manipulate invalid ratios? Can we make a best guess, or do we default to 'unknown'? If MOA changes the ratios during the data cleanse, we assume we don't need to trigger a new D0150 or D0268?
IMServ	Other	Duplicate question
Association of Meter Operators	None provided	This CP is not seeking to cleanse and ensure the 'correct' ratio is used on every metering system. This would require an extensive exercise over several years.
Scottish & Southern Electricity Networks	See Q6	None provided.
E.ON energy solutions		Please see response to Q6.
SMS Plc	Yes	The cost and time needed would be considerably higher to complete a full data cleanse of our whole CT/VT portfolio than to cleanse the invalid ratios. The ongoing covid-19 rolling lockdowns will continue to be a barrier to completing the required onsite visits. Additionally, due to the issues experienced by all in 2020, companies continue to divert resource to catch up on smart meter rollout requirements
Western Power Distribution		A cleanse of erroneous ratios has not been part of this change proposal therefore we are unable to quantify this.
Northern Powergrid		The office based data cleanse referred to in Q6 will likely identify a number of erroneous ratios with our database. The word erroneous means incorrect or wrong so we refer to, for example, a ratio being 20/5 rather than 200/5 for LV as likely erroneous in our database. The consultation references that although a full data cleanse would be the ideal approach, the industry is currently unable to support this i.e. parties would need to visit legacy

Respondent	Response	Rationale
		<p>sites, including those where information has been misplaced, to determine the measurement transformer ratios. Therefore, the data cleanse we refer to in Q6 and Q7 does not include site visits and we endorse the SVG Chair's view that a full data cleanse (including site visits to confirm any CT/VT ratios) will not be possible at this time.</p>
Sottish Power		<p>As part of this activity we would require a definition of what is to be identified as "invalid" in relation to what is to be identified as "erroneous".</p> <p>To carry out the cleans we would have to conduct desk top analysis to categorise as invalid and erroneous. Once the erroneous data has been identified we would have complete further desk top analysis against the valid data set as published by Elexon. Where we are unable to cleanse in this way, we would have to potentially visit the site to confirm the details at the premise. It is difficult to determine how much time this will take until have a clear understanding of the definition for "invalid" and "erroneous"</p> <p>If on assumption "erroneous" data is defined as existing in the valid CT/VT data set, but applied incorrectly to a metering supply, we would anticipate that this would be extremely difficult to cleanse as a desk exercise unless guidelines are provided. Site visits would also be prohibitive from a cost and scheduling perspective if this is a large volume to manage.</p>
Callisto	No response	No response

Question 8: Do you believe that there are any additional CT/VT ratios which should be included in valid list compiled by ELEXON under this Change Proposal?

Summary

Yes	No	Neutral/No Comment	Other
2	6	2	0

Responses

Respondent	Response	Rationale
Siemens MAS	No	None provided
IMServ	Yes	<p>Although the list compiled by Elexon seems to be comprehensive we do have some oddities which are not listed:</p> <p>CT 160/5 – We have one site using this ratio, photo of CT rating is available</p> <p>CT 315/5 – We have one site using this ratio, photo of CT rating is available</p> <p>CT 125/5 – We have one site using this ratio, adopted meter so no evidence available</p> <p>VT 550/110 – We have one meter operating with this very odd VT ratio, although the site appears to be in a mothballed state.</p>
Association of Meter Operators	Yes	<p>There are two aspects to the list compiled by ELEXON it needs to:</p> <p>i) only include ratios that exist in the field, and</p> <p>ii) it should not include ratios that do not really exist.</p> <p>The first aspect is self-evident, the second aspect is important to ensure that erroneous values are not 'institutionalised' and believed to be correct when they are in fact incorrect.</p> <p>It is there beholden on ELEXON to ensure there is sufficient rigor in ensuring that the valid set is trusted and accurate. Where there are suspect ratios identified then documentary evidence of the ratio validity need to be obtained – this would ideally be photographic evidence of the rating plate, or copies of certificates, etc.</p> <p>There are a small number of unusual ratios which will be identified, such that between now and June 2021, and probably thereafter these will be identified for inclusion.</p>

Respondent	Response	Rationale
		<p>To provide confidence to the market it may be worthwhile to add some commentary to the valid set for the unusual values, such as copies of photos and background information to justify the inclusion.</p> <p>It may also be worth getting verification from the LDSO and Meter Operator before adding to the valid set. The above issues can all be built into the ELEXON working instructions which can allow the correct balance of rigor and flexibility.</p> <p>An inspection of the list in the appendix would benefit from checking:</p> <p>CT – 3600/5 – is this really a typo of 3500/5</p> <p>VT – 24400/110, 25000/110, 26400/110 these are all related to Network Rail nominal 25kV supplies, but seems curious to have so many different variants</p> <p>VT – 33000/63.5 – seems odd as the only ratio that ends in 63.5 volts</p> <p>VT – 5500/110 – is this a typo for 6600/110?</p> <p>VT - 6600/100, 11000/100 and 66000/100 – seems odd as the only entries that end on 100 volts</p> <p>VT – 1000/110, 1100/110, 11100/110 all seem unusual voltages or are typos</p> <p>VT – 2200/110, 6100/110 all seem unusual voltages or are typos</p> <p>The list of CT & VTs that ELEXON produced in 2016 based on dataflows at that time was a much smaller set.</p> <p>The BSCP drafting has “unknown” and “unkwn” as lower case. The valid set list has “UNKNOWN” and “UNKNWN” as upper case. To avoid ambiguity the documents, need to be aligned as the capitalisation will be relevant to parties confirming the valid set.</p>
Scottish & Southern Electricity Networks	No	None provided
E.ON energy solutions	No comment	No comment
SMS Plc	No	None provided

Respondent	Response	Rationale
Western Power Distribution	No	We can only provide a response in respect of our own Distribution areas. We have reviewed the list of CT and VT ratios in respect of our distribution areas and have amended accordingly. A revised spreadsheet was attached to our response to the original Change Proposal Response.
Northern Powergrid	No	Not that we are aware of. However, this is not to say there won't be ones that have not been identified to date. This makes the option to update the Elexon portal list a requirement.
Sottish Power	No	None
Callisto	No response	No response

Question 9: Do you have any further comments on CP1530?

Summary

Yes	No
5	5

Responses

Respondent	Response	Comments
Siemens MAS	No	N/A
IMServ	Yes	<p>We believe the approach which a MOP conducts data cleanse activates could have an impact on other parties when the sites churn. For example, conceivably a MOP could decide that it was easier to convert values such as 'W/C' or '999' to 'UNKNOWN' rather than making an effort to correctly identify the metering as Whole Current, and then duly deleting the erroneous values. This low effort approach would likely result in a significant volume of MTDs being circulated with 'UNKNOWN', on CoA the receiving MOP would then be left with the task of correctly identifying the CT/VT ratios.</p> <p>Could Elexon publish a best practice guide with the aim of minimising the number of 'UNKNOWN' CT/VT ratios?</p>
Association of Meter Operators	Yes	<p>There is the risk that this CP could result in certain ratios which are not included in the valid set being adjusted to the 'valid' values even through the current value is correct. This is a risk which needs to be balanced to the benefit of the identifying and removing invalid values.</p>
Scottish & Southern Electricity Networks	Yes	<p>The inclusion of the CT metering System wiring mode may help, especially at HV level; i.e. 3 phase 3 wire & 3 phase 4 wire.</p>
E.ON energy solutions	Yes	<p>Whilst noting that the proposed changes put forward as part of this consultation provides a benefit to implementing CP1530, we believe that the benefit is very small as per our response to question 1.</p> <p>We feel that a lot of additional industry cost & effort that could have otherwise been avoided if guidance on populating CT/VT values in requisite dataflows</p>

Respondent	Response	Comments
		was properly considered without the need to implement a restrictive valid dataset within the existing J-items.
SMS Plc	No	N/A
Western Power Distribution	No	N/A
Northern Powergrid	Yes	BSCP 514 has a couple of typos in section 3. Ref 3.1.3 says "Within 5 WDs of 3.11.1". Should be 3.1.1 And 3.1.5 says "Within 2 WDs of 3.11.4". Should be 3.1.4
Sottish Power	No	N/A
Callisto	No	No response

BSCP514

Respondent	Location	Comment
SMS Plc	1.1	<p><i>'Where a Meter Operator receives a value that is invalid (missing from the valid set) it should set the value to 'unknown 'and contact the sender and/or LDSO for resolution and Elexon if an update to the Valid Set is required.'</i></p> <p>Requiring the MOP to update the CT/VT to unknown, then investigate and request the CT/VT be added to the Valid Set before changing the CT/VT ratio back to the now valid value, increases the manual intervention of MTDs and therefore the risk of manual error. Additionally, it will have adverse effects on HM13 reporting.</p>