

CP Consultation Responses

CP1572 'Specifying the requirements to provide Single Line Diagrams (SLDs) for High Voltage (HV) and Extra High Voltage (EHV) sites'

This CP Consultation was issued on 7 November 2022 as part of the November 2022 CPC Batch, with responses invited by 2 December 2022.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Northern Powergrid	1	Distributor
BUUK	1	Distributor (Independent)
SMS Plc	1	CVA MOA, SVA MOA, DC, DA
Scottish Power	1	MEM
IMServ	1	MEM
National Grid Electricity Distribution	1	Distributor
Siemens	1	MEM
Electricity North West Limited	1	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Northern Powergrid	✓	✓	✓	✓
BUUK	✗	✓	-	✗
SMS Plc	✓	✓	✗	✓
Scottish Power	✓	✓	✓	✓
IMServ	✓	-	-	✓
National Grid Electricity Distribution	✓	✓	✓	✓
Siemens	✓	✓	✓	✓
Electricity North West Limited	✓	✓	✓	✓

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Question 1: Do you agree with the CP1572 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	1	0	0

Responses

Respondent	Response	Rationale
Northern Powergrid	Yes	We are aware of the requirement within BSCP27 to provide them so a requirement in the CoPs to create them is logical.
BUUK	No	<p>There is limited rationale to support the need for this change. There is a lack of detail on what the SLDs will need to show and how this is to be used.</p> <ul style="list-style-type: none">- While this applies for complex metering systems, the benefit of this approach for non-complex systems is not clear.- What information would be needed for the SLDs? Just the phases etc.? If so, then the MOP should already have this information when installing the meter and commissioning the system.- How would this information be shared? Currently communication with MOPs/Suppliers is via data flows which would not have the functionality to permit the sharing of SLDs.- If this information is not to be shared and is simply there for audit purposes then it is an onerous obligation with no benefit either to parties or to the end consumer.
SMS Plc	Yes	N/A
Scottish Power	Yes	<p>Yes, we agree in principal with the proposal but would like further information to be provided on the mechanism that is to be utilized for the LDSO/Other agents to issue the SLDs.</p> <p>As a MEM would also like to have clarification on the following statement "Adding a requirement in the CoP will</p>

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		ensure that there is an obligation on the LDSO, or other BSC Parties” As we believe that this should not be an action for the MEM.
IMServ	Yes	We can see how SLDs can be really useful in TAA desktop audits to identify where the AMP doesn't equal the DMP, it is more cost effectively than an expensive site visit.
National Grid Electricity Distribution	Yes	We agree with the CP1572 proposed solution.
Siemens	Yes	As written and in principle mandating SLDs will allow for cohesion across roles especially as previous changes mandated the sending of SLDs. Mandating their creation will enhance current processes.
Electricity North West Limited	Yes	The approach provides a more robust approach to ensuring new connections are correctly including into settlements.

Question 2: Do you agree that the draft redlining delivers the CP1572 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
Northern Powergrid	No	See CP redlined text section
BUUK	No	Please refer to the above answer
SMS Plc	Yes	N/A
Scottish Power	Yes	Yes
IMServ	Yes	Please consider that SLDs can also be incorrect, become out of date, etc., so we wouldn't like to see them used in desktops audits at the expense of sites visits completely. In our opinion there is no substitute to being on site and having everything in front of you.
National Grid Electricity Distribution	Yes	We agree that the draft red-lining delivers the CP1572 proposed solution
Siemens	No	The CP does mandate the SLD however there are uncertainties around the SLD process once mandated. These points are: 1. Like CP1559 (templated CSSIF form), a template or standardized SLDs would allow all parties to know the format of what to send and receive. Current proposal states SLD will be mandated but does not specify the format of the SLD. 2. What controls will be in place to ensure the most recent version of a given SLD is the most recent version? There is a risk parties may send

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		<p>outdated SLDs without such controls in place.</p> <p>3. Where does responsibility lie in reporting and correcting discrepancies between an SLD and the onsite set up?</p> <p>4. This is due 29th June 2023 (subject to agreement). Where a request and connection straddle this date we assume this new process will not apply and there will be no requirement for retrospective creation of SLDs.</p>
Electricity North West Limited	Yes	N/A

Question 3: Will CP1572 impact your organisation?

Summary

High	Medium	Low	None	Other
0	2	5	0	1

Responses

Respondent	Response	Rationale
Northern Powergrid	Medium	We will need to amend our internal processes to ensure they are created in the correct format for the sites in question and that we file them in an appropriate place to provide to TAA/Elexon when required.
BUUK	Medium	Increased obligations surrounding the creation of SLDs would result in greater workload for the creation, logging and maintenance of these records. Dependent on whether these were to be communicated to Suppliers/MOPs and how this is intended to be sent, this may result in system changes with associated costs.
SMS Plc	Low	As CVA/SVA MOA we will need to introduce processes around receipt, storage and sending of the SLDs.
Scottish Power	Low	There will be an impact to IT systems if the mechanism to issue the SLD information is flow driven. This would result in a potential change for status from Low to Medium.
IMServ	Don't know	As a MEM we expect the impact will be minimal, however it's not clear what part the MEM will take in managing SLDs
National Grid Electricity Distribution	Low	We currently supply SLDs for HV/EHV. However, having been involved in the workgroup we will need to ensure that the SLDs can be provided easily should they be requested by Suppliers or MEMs. Therefore there would be an impact on developing this solution for the SLDs together with updating our

		internal Standard Techniques to ensure the full process is captured.
Siemens	Low	Answer given to address CP as written as answers to points raised in Questions 2 & 6 may increase the scope. Impact will scale up especially for CoP3 & CoP5 meters as we deal with these meters in much greater volume. We assume no retrospective corrections required otherwise impact will be greater.
Electricity North West Limited	Low	We already create SLD for connections to ensure accuracy of network mapping.

Question 4: Will your organisation incur any costs in implementing CP1572?

Summary

High	Medium	Low	None	Other
0	0	4	2	2

Responses

Respondent	Response	Rationale
Northern Powergrid	Low	Administrative time in amending process, filing documents and providing them on request.
BUUK	Uncertain	Please refer to above response
SMS Plc	None	N/A
Scottish Power	Low	As per response to Q3
IMServ	Don't know	As a MEM we expect the impact will be minimal, however it's not clear what part the MEM will take in managing SLDs
National Grid Electricity Distribution	Low	We currently supply SLDs for HV/EHV, however, having been involved in the workgroup we will need to ensure that the SLDs can be provided easily should they be requested by Suppliers or MEMs. Therefore costs would be incurred to develop this solution for the SLDs.
Siemens	Low	Answer given to address CP as written as answers to points raised in Questions 2 & 6 may increase the scope. Impact will scale up especially for CoP3 & CoP5 meters as we deal with these meters in much greater volume. We assume no retrospective corrections required otherwise impact will be greater.
Electricity North West Limited	None	We do not believe there will be any associated costs.

Question 5: Do you agree with the proposed implementation approach for CP1572?

Summary

Yes	No	Neutral/No Comment	Other
7	1	0	0

Responses

Respondent	Response	Rationale
Northern Powergrid	Yes	N/A
BUUK	No	Please refer to above responses.
SMS Plc	Yes	N/A
Scottish Power	Yes	Yes, but only on the provision that the mechanism for issuing the SLD info is not flow driven. If IT system changes are required then the target date may not be achievable.
IMServ	Yes	N/A
National Grid Electricity Distribution	Yes	N/A
Siemens	Yes	As written and in principle we agree with the proposed implementation. Correct roles targeted and mandating SLDs from June 2023 for new or reworked Meters is appropriate.
Electricity North West Limited	Yes	N/A

Question 6: Do you have any further comments on CP1572?

Summary

Yes	No
4	4

Responses

Respondent	Response	Comments
Northern Powergrid	Yes	<p>It would be useful including a couple of typical example SLDs in the consultation (and maybe in the CoPs) to show what is expected as a guideline.</p> <p>As the changes to the CoPs are a result of the requirement to provide SLDs in BSCP27, BSCP27 will also require amending to specify that a SLD is only required for HV and EHV metering systems when conducting the audit.</p>
BUUK	Yes	<p>While there is a plausible case for SLDs for complex sites, we would query the value of creating these for non-complex systems.</p>
SMS Plc	No	N/A
Scottish Power	No	N/A
IMServ	Yes	<p>The suggested changes to the CoP seems to be a very light touch implementation. For example the suggested wording says that the SLDs have to be produced, but not by who, who they are send to, who is responsible for retaining them, etc. If the MOP is supposed to retain them, what happens on COA, etc?</p> <p>We assume the Registrant would have the overall responsibility to ensure this happens, but it would be good to have more detail on how this should work to ensure it happens. We can see the CoP may not be the right place to do this, should the REC also be involved?</p>

National Grid Electricity Distribution	No	N/A
Siemens	Yes	<p>1. Will installation be conditional on the receipt of an SLD? For example, can a MOP reject request without the SLD provided first for CoPs in scope of the proposal?</p> <p>2. What are the benefits of extending this to CoP 3 & 5? There are concerns that SLDs will be sent to fulfil the need of creating them but won't benefit the Settlement process. How many audits have failed due to CTs on wrong side/wrong ratio and how will SLD remedy this. We believe the cost of including CoP3 & CoP5 outweighs the business/industry benefits.</p>
Electricity North West Limited	No	N/A

Code of Practice 1, 2, 3 and 5

Respondent	Location	Comment
Northern Power Grid	Section 3 – interpretations and definitions	Suggest including the symbol ‡ after SLD in the definitions and interpretations section as it appears to be specific to the CoP (as per the introduction of section 3).
Northern Power Grid	Section 5.8	I don't think the words "provide an" is right in the sentence "All High Voltage and Extra High Voltage sites must provide an SLD,...." The site isn't providing anything! I think "have a SLD" would be better.
Siemens	3.31 / 5.7	Should this proceed a practical method of passing the documents or acknowledgment that an SLD has been verified by the LDSO needs to take place. Perhaps adding an extra filed to the D383 flow with a Y or N that there is an SLD from LDSO and a Y or N or NA (no access) from the MOP to say that it is standard following the MOP P283 commission.
Siemens	3.31 / 5.7	Should this proceed, the obligation would need to be placed on the DSO to provide unique schemes to the MOP and registrant. Clear remedies need to be within the COPs should this not be provided.