By e-mail to: dcode@energynetworks.org

11 April 2020

Dear Distribution Review Code Panel Secretary,

ELEXON's response to your public consultation on the Distribution Code Consultation DCRP/20/03/PC Engineering Recommendation (EREC) P24 Issue 2 (2020) - AC supplies to railway systems

ELEXON is the Code Manager for the Balancing and Settlement Code (BSC). We are responsible for managing and delivering the end-to-end services set out in the BSC and accompanying systems that support the BSC. This includes responsibility for the delivery of balancing and imbalance settlement and the provision of assurance services to the BSC Panel and BSC Parties. We manage not just the assessment, but also the development, implementation and operation of changes to our central systems and processes.

Our responses to the questions in the consultation are detailed below. We have only answered those questions where we believed we could add value.

For the avoidance of doubt these views are those of ELEXON Ltd alone, and do not seek to represent those of the BSC Panel or Parties to the BSC.

If you would like to discuss our response in detail, please contact Iain Nicoll, iain.nicoll@elexon.co.uk.

Yours faithfully,

Iain Nicoll
Metering Team Leader

PUBLIC CONSULTATION ON THE DCRP/20/03/PC ENGINEERING RECOMMENDATION (EREC) P24 ISSUE 2 (2020)

Q2: Do you agree with the proposed text contained in EREC P24 Issue 2, or do you have any alternatives to propose?

ELEXON is only commenting on clause 12.9 as it references the BSC and the requirements for metering.

In line 1612, Code of Practice (CoP) 2 is referenced as the most common occurrence. In order to ensure Settlement Metering Equipment installed for a circuit is compliant with the relevant CoP it would be better to use the language in Section L 'Metering' of the BSC and refer to the 'relevant' CoP based on the rated circuit capacity. The CoPs define the minimum requirements for the Metering Equipment required for the measurement and recording of electricity transfers at Defined Metering Points based on the rated circuit capacity. Where the rated circuit capacity is determined by the lowest rated primary plant (e.g. transformer rating, line rating, etc) of the circuit. This could be done prior to this paragraph or instead of this paragraph (ideally).

There is a requirement in BSC Section L for Settlement Metering Equipment to be commissioned in accordance with the prevailing version (and Issue) of a specific CoP. It would be beneficial to reference CoP4 'Code of Practice for the Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes' or more simply you could say 'Settlement Metering Equipment shall be commissioned in accordance with the version (and Issue) of the relevant CoP prevailing at the time of commissioning'. Additionally, you could mention that 'Commissioning of Settlement Metering Equipment shall be completed within the timescales set out in the relevant BSC Procedure (BSCP)' (for information, these are BSCP02 for CVA Metering Systems or BSCP514/515 for SVA Metering Systems).

In line 1620, the location of current transformers (CTs) and voltage transformers (VTs) is discussed. Under the BSC, unless the BSC Panel (authority is normally delegated to two BSC Panel Committees) approves a Metering Dispensation (BSCP32 is the relevant BSC procedure for Metering Dispensations), the Metering Equipment shall be installed at the Defined Metering Point in accordance with the relevant CoP. Where the Defined Metering Point means the physical location at which the overall accuracy requirements as stated in the relevant CoP are to be met; the Defined Metering Points are identified in Appendix A of the relevant CoP and relate to Boundary Points and System Connection Points. Suggested wording would be 'Settlement CTs and VTs must be installed at the Defined Metering Point as set out in the relevant BSC (metering) Code of Practice'.

In line 1634, the section on Meters doesn't reference that the Meters must be approved for use in Settlement in accordance with the relevant BSCP (BSCP601 is the relevant procedure for compliance testing and protocol approval of Settlement Meters and Outstations). It would be beneficial to mention that compliance testing and protocol approval testing must have been successfully completed for any Meter or Outstation used in Settlement and be on the ELEXON CoP Compliance and Protocol Approvals list, which can be found on the BSC Website (https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/codes-of-practice/codes-practice-compliance-protocol-approvals/). Note that the CoPs require Active Energy Meters provided for the metering of supplies to customers to be in accordance with Schedule 7 of the Electricity Act 1989. The Office of Product Safety and Standards are responsible for legal metrology (https://www.gov.uk/guidance/gas-and-electricity-meter-regulations). Suggested wording would be 'Settlement Meter and associated Outstation types must be approved for use in Settlements in accordance with the relevant BSCP. A list of CoP compliant and protocol approved Meter and Outstation types can be found on the BSC Website'.

In line 1645, where it references using labelling to identify the circuit associated with the meter, it might be better to clearly identify the circuit and purpose (i.e. metering current or voltage, and phase).

END