

## Private Wire Networks: Key Mechanisms and Controls

---

1. The collection of Balance and Settlement Code (BSC) metered data is subject to complex requirements and controls, as described later in this paper. These serve to ensure the accuracy of data entering settlement, and are appropriate in the context of Half Hourly Data Collectors (HHDCs) who would typically each be collecting data for many thousands of sites.
2. However, to apply all these measures to Generators on private networks could make it disproportionately difficult and expensive for such Generators to comply with the non-BSC data collection requirements of their CfD contract. An appropriate balance therefore needs to be drawn.
3. The following table identifies the key mechanisms and controls<sup>1</sup> in use under the BSC to ensure that correct and accurate metered data enters settlement. These mechanisms and controls will be equally applied to non-BSC metered data from Generators on private networks. Further detail will be outlined in the Non-BSC Metering and Data Management Rules.

Existing BSC Metering Mechanisms/Controls <sup>2</sup>		
Mechanism or control	Purpose of mechanism or control	Application to non-BSC meters on private networks
<p><b>Codes of Practice (CoP)</b> - an obligation on Supplier's to install BSC-approved Metering Equipment of a type that has demonstrated its compliance<sup>3</sup> with an ongoing and relevant CoP.</p> <p>Where the Metering Equipment is not CoP compliant, a Metering Dispensation is necessary.</p>	<p>To provide assurance that the physical Metering Equipment is of an appropriate type and remains fully function and accurate.</p>	<p>Requiring BSC CoP-compliant metering systems will maintain a consistent approach across CfD Generators and should not be overly burdensome.</p> <p>CoPs 1-4 are likely to apply.</p> <p>A CfD process for Metering Dispensations is necessary to allow Generators to use a different metering measurement methodology which reasonably and accurately provides assurance.</p> <p>Any Metering Dispensation granted for the purposes of the</p>

<sup>1</sup> These are the main controls and mechanisms applicable to Generators trading on the public electricity market and therefore enforced by BSC. In developing the Non-BSC Rules, DECC may determine in consultation with the CfD Expert Group on Metering that further mechanism and controls are necessary.

<sup>2</sup> This table identifies controls relating to Half Hourly Metering Systems registered in the Supplier Metering Registration Service (SMRS), as these are most comparable to the private network scenario. Similar but different controls apply to Metering Systems registered in the Central Metering Registration Service (CMRS).

<sup>3</sup> BSC Procedure [BSCP601](#) (*'Metering Protocol Approval and Compliance Testing'*) specifies the process by which meter manufacturers demonstrate that their Metering Equipment complies with the Codes of Practice.

Existing BSC Metering Mechanisms/Controls <sup>2</sup>		
Mechanism or control	Purpose of mechanism or control	Application to non-BSC meters on private networks
		CfD scheme will be granted by the Counterparty Body (informed by the CfD Settlement Agent).
<b>Technical Assurance of Metering Systems and the Performance of Parties</b> – includes random and targeted site visits to verify compliance of Metering Equipment and to ensure systems are designed correctly.	<p>To provide assurance that the Metering Equipment complies with Codes of Practice (as applicable) or has been installed and used under a valid Metering Dispensation.</p> <p>To provide additional assurance that parties are undertaking their metering processes correctly.</p>	<p><u>Technical</u> – the CfD Settlement Agent will be able to procure a technical assurance service to assist in identification and remediation of non-compliance (particularly as some of the other controls applying to BSC Metering Systems will be missing).</p> <p><u>Performance</u> - CfD Settlement Agent will be able to arrange technical assurance checks.</p> <p>Further details to be provided in the Non-BSC Metering and Data Management Rules.</p>
<b>Meter Proving Test<sup>4</sup></b> – an obligation on HHDC and Meter Operators to ensure that Active Power data read remotely by the HHDC matches that recorded on-site.	To provide assurance that HHDC has correct Meter Technical Details and is retrieving metered data correctly.	<p>Meter proving test (when Metering Equipment is installed or specific parts are replaced in line with a deemed “material change”) would provide significant assurance that system is operating correctly and that correct and accurate metered data is being supplied for settlement.</p> <p>The meter operator would undertake this test (for private wire it is likely to be the Generator themselves).</p>
<b>Data Validation Rules<sup>5</sup></b> – an obligation on HHDCs to validate metered data in accordance with agreed rules before submitting it to settlement.	To prevent incorrect metered data entering settlement where possible.	<p>The specific checks outlined sections 4.1.1 to 4.1.7 in BSC Procedure 502 will be applicable.</p> <p>Where Metering Dispensations have been granted under the CfD scheme, the same checks will be applicable.</p> <p>Data validation will be approved by the Counterparty Body (informed by the CfD Settlement Agent).</p>

<sup>4</sup> See Appendix 4.6 of BSCP502, ‘Half Hourly Data Collection for SVA Metering Systems registered in SMRS’

<sup>5</sup> See Appendix 4.1 of BSCP502.

Existing BSC Metering Mechanisms/Controls <sup>2</sup>		
Mechanism or control	Purpose of mechanism or control	Application to non-BSC meters on private networks
<b>Data Estimation Rules<sup>6</sup></b> – an obligation on HHDCs to estimate missing data	To minimise error in settlement by allowing estimated data to be used in settlement.	<p>Generators or their appointed third party data collector could either:</p> <ol style="list-style-type: none"> <li>1. apply the BSCP502 estimation rules,</li> <li>or</li> <li>2. do not undertake self-estimation (in which case the CfD Settlement Agent will estimate missing data as per the Standard Terms of the contract).</li> </ol> <p>Further details to be provided in the Non-BSC Metering and Data Management Rules.</p>
<b>Agreed processes for investigation of faults</b> – a list of BSC procedures which stipulate the processes by which Meter Operator Agents, Data Collectors, Suppliers and Distributors investigate metering faults.	To provide clarity on who is responsible for correcting metering faults.	<p>Existing BSC procedures are not applicable. However a bespoke CfD mechanism has been drafted into the CfD Standard Terms for all CfD Generators.</p> <p>The Metering Undertakings conditions in the CfD Standard Terms will need to be reviewed.</p>
<b>Agreed method for data submission</b> – BSCPs define data flows to be used for submitting data into settlement over the Data Transfer Network (DTN).	To provide a reliable and robust mechanism for submission of data into settlement.	<p>Use of DTN will be disproportionately expensive.</p> <p>The CfD Settlement Agent will specify a different interface (e.g. web services or emailed files over the internet).</p> <p>This system is being developed separately.</p>

<sup>6</sup> See Appendix 4.2.2 of BSCP502