

# WP134 – CfD Metering Technical Assurance

Public

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## Change Amendment Record

Version	Date	Description
1.0	2 March 2016	Go-Live Version
2.0	13 October 2017	Document transfer to new template
3.0	18 April 2019	Desk based analysis removed as covered under Operational Conditions Precedent process
4.0	27 August 2020	Amendments to Section 3 and Annual Review
5.0	1 September 2021	Amendments to Section 3 and Annual Review
6.0	20 December 2022	Housekeeping updates
7.0	6 June 2024	Annual Review
8.0	17 September July 2025	Annual Review and Updates to reflect new LCCC and EMRS visual identities

## 1. Introduction

The Contracts for Difference (CfD) scheme is managed by the CfD Counterparty, this role is performed by Low Carbon Contracts Company (LCCC).

The Metering System used by a Generator is subject to a technical assurance process. LCCC has the right to carry out an onsite audit on the Facility Metering Equipment. LCCC have outsourced this metering assurance to a Management Services Provider (MSP).

### 1.1 Scope and Purpose

This document has been written by EMR Settlement Ltd (EMRS) on behalf of the LCCC for the CfD scheme. It covers procedures for the MSP and Metering Agent (MA) roles. The MSP role is being fulfilled by EMRS. If you have any questions on the MSP and MA roles, please contact LCCC.

### 1.2 Main Users and Responsibilities

Table 1: Main Users and Responsibilities

Role	Responsibilities
CfD Generator	To provide required information on the Metering System and arrange site access.
Low Carbon Contracts Company Ltd (LCCC)	To arrange a Service Provider to manage the metering assurance process. Notify CfD Generator of results of non-compliance.
Management Services Provider (MSP)	Service Provider who will perform the management of the Metering Assurance Process on behalf of the LCCC. Arrange Metering Agent to perform audits and send results to the CfD Generator.
Metering Agent (MA)	Service Provider who will perform the onsite testing and analysis of technical specifications and test results on behalf of the Management Services Provider.
CfD Settlement Services Providers (EMRS)	Service Provider who will perform the settlement role in CfD.

### 1.3 Associated Documents

This working practice should be read in conjunction with the following documents:

- CfD Standard Terms and Conditions<sup>1</sup> and all subsequent amendments
- CfD Agreement<sup>2</sup> and all subsequent amendments
- Private Network CfD Agreement<sup>3</sup> and all subsequent amendments
- BSCP27 – Technical Assurance of Half Hourly Metering Systems for Settlement Purposes<sup>4</sup>
- WP133 - EMR Metering Disputes Resolution Procedure<sup>5</sup>

<sup>1</sup> <https://www.gov.uk/government/publications/contracts-for-difference-standard-terms-and-conditions>

<sup>2</sup> <https://www.gov.uk/government/publications/contracts-for-difference-standard-terms-and-conditions>

<sup>3</sup> <https://www.gov.uk/government/publications/contracts-for-difference-standard-terms-and-conditions>

<sup>4</sup> <https://www.elexon.co.uk/csd/bscp27-technical-assurance-of-half-hourly-metering-systems-for-settlement-purposes/>

<sup>5</sup> <https://www.emrsettlement.co.uk/publications/working-practices/>

## 2. Background

The MSP will appoint a suitably qualified agent to check compliance to the technical specifications and perform an onsite audit of the Facility Metering Equipment. This working practice is also relevant to that nominated representative of the MSP, the MA.

In the CfD Agreement, the Generator is referred to as the Facility and the Metering System used to measure net Metered Volume is the Facility Metering Equipment.

The Metering Technical Assurance process allows for onsite audits to be carried out to provide assurance that the Metered Volumes submitted to EMRS are accurate. EMRS are performing the settlement role on behalf of the LCCC.

A targeted audit for any applicable CfD Generator can occur at any time on request from LCCC.

LCCC can request that the MSP randomly select Facilities for audit based on risk categories. All Generators participating in CfD will be split into different risk categories. The number of onsite audits performed for each category will be determined by the net significance of the risk for that category. The risk categories in CfD are:

- Central Meter Registration Service (CMRS) sites;
- Supplier Meter Registration Service (SMRS) sites; and
- CfD Generators on Private Networks;

The Metering Assurance Framework is based on the existing Balancing and Settlement Code (BSC) Performance Assurance Framework (PAF) and an additional CfD Assurance Framework. This CfD Assurance Framework is for risks which are specific to CfD Generators on a Private Network and any specific risks associated with CfD Generators that are not covered by the BSC PAF.

For a CfD Generator on a Private Network there will be an onsite audit within three months of the generation Start Date (Condition 3.21<sup>1</sup>), irrelevant of the MA witnessing the initial Commissioning and Proving Tests. This is to provide added assurance that the Metered Volumes are correct as the Generator is not subject to any of the requirements and validation in the BSC.

A CfD Generator on a Private Network will be subject to regular onsite audits thereafter. These will occur every three to five years for the duration of the CfD Agreement<sup>1</sup>. This will be up to a maximum of three subsequent audits with an audit conducted in the last year of the CfD Agreement.

The MSP will determine the sites to be audited, based on instructions from LCCC, and will inform the MA. The MA will be responsible for arranging, where requested to do so by LCCC, and in all cases conducting the onsite audit of the Facility Metering Equipment.

The Metering Technical Assurance process will confirm:

- The installed assets match the submitted details in the Operational Conditions Precedent (OCP) 2.1 (C), (D) and (E);
- The Electrical Schematic Diagram accurately indicates the Defined Metering Point (DMP);
- Perform tests to verify the energy recorded by the Facility Metering is accurate and consistent with the primary energy; and
- Will also confirm the method of data submission accurately passes on Metered Volumes to EMRS.

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### 2.1 Arrange Site Access

The CfD Generator is required to grant access (or arrange access with the Registrant of the Boundary Point Metering Equipment) to the Facility and the Facility Metering Equipment for audit purposes. This is the Metering Access Right that is part of the conditions in the CfD Agreement. The purpose of the access is to allow the Facility Metering Equipment to be read, inspected and tested to verify any relevant data.

For CMRS and SMRS Registered Generators; audits will be arranged through a Metering Inspection Notice. For Private Network CfD Generators; audits can be an unannounced visit or arranged through a Metering Inspection Notice (the latter if an unannounced visit is impractical due to the Facility being unmanned or due to health and safety requirements).

The onsite audit can be arranged by LCCC or this activity can be delegated to the MA by LCCC.

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The MA will specify who the suitably qualified person attending site will be. The MA shall at all times comply with the Health & Safety rules of the Generator and is suitably authorised and competent to exercise the Metering Access Right.

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### 2.2 Metering Technical Assurance

The onsite test will determine if the CfD Generator has satisfied the Electrical Schematic Diagram Obligation and the Metering Compliance Obligation as required in the CfD Agreement.

The onsite test will be based on the principles of the Inspection Visits described in Appendix 4 (4.1) of BSCP27<sup>6</sup>. A summary of the Metering Assurance Test is outlined below:

- Confirm that the location of the Current Transformers (CT) and Voltage Transformers (VT) (both CTs and VTs being Measurement Transformers) are at the DMP of the Facility and that it is in such a position to measure the net Metered Volume of the Facility;
- Confirm from the Electrical Schematic Diagram that no other circuits can impact the net Metered Volume of the Facility and give a false indication of generation; i.e. from another separate connection to the Total System, Private Network or another part of the Facility owner's site;
- Confirm the ratio, class, rated burden and polarity of the Measurement Transformers onsite (if safe to do so). Check the Test Certificates and Commissioning Certificates of the Measurement Transformers;
- Confirm the class, serial number, programmed ratios, programmed compensations and test facilities of the Meters onsite. Check the Test Certificates and Commissioning Certificates of the Meters;
- Confirm the overall accuracy at the DMP is within the allowed limits as per the applicable Code of Practice (CoP)<sup>7</sup> or Private Network Agreement Technical System Requirements (TSR), as applicable;
- Confirm the Meter Technical details onsite match those submitted and confirm these with the relevant data collection agency;
- Carry out a Correct Energy Measurement Check (see description in Appendix 2) to determine that the energy recorded by the Meter is accurate. If possible, compare the instantaneous power recorded by the Meter to an independently measured primary indication;
- Carry out a Consumption Data Comparison Check (see description in Appendix 2) to determine that one half hour period recorded by the Meter is consistent with, when read by the Data Collector (DC), Half Hourly Data Collector (HHDC) or Central Data Collection Agent (CDCA), the value held by the relevant data collector. This should be checked after the visit to confirm that EMRS has received the same value for the period (account for any applied Line Loss Factors (LLF)). This figure should also be compared with the energy measured during the Correct Energy Measurement Check. If the CfD Generator is submitting data by Comma Separated Values (CSV) file this method should be demonstrated and the file submitted to EMRS via Secure File Transfer Protocol (SFTP) to confirm the value;
- In a situation where the Meter does not have its time synchronised by a data collection system the CfD Generator will demonstrate how they synchronise the time in the Meter;
- On a Private Network the voltage level of the Facility Metering Equipment and the voltage level at the Boundary Point of the Private Network to the Distribution System will be compared against that submitted as the voltage class for use in LLFs; and
- Check the quality of the installation.

If the Metering System is a BSC registered Metering System then the CfD Generator will arrange for either the Central Volume Allocation (CVA) Meter Operator Agent (MOA)<sup>8</sup> or the Supplier Volume Allocation (SVA) Retail Energy Code<sup>9</sup> Metering Equipment Manager (MEM)<sup>10</sup> to attend, and a suitably authorised representative of the Distribution Company or National Electricity Transmission System Operator (as applicable), to attend for Measurement Transformer access.

For a Private Network a suitably authorised site electrical engineer will be present to allow access to the Meters and Measurement Transformers (if a 3rd party CVA MOA/SVA MEM has been used the CfD Generator must arrange for them to be on site).

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<sup>6</sup> <https://www.elexon.co.uk/csd/bscp27-technical-assurance-of-half-hourly-metering-systems-for-settlement-purposes/>

<sup>7</sup> <https://bscdocs.elexon.co.uk/codes-of-practice>

<sup>8</sup> If the Metering System is registered in the Central Meter Registration Service

<sup>9</sup> <https://recportal.co.uk/web/guest/rec-wiki-final/-/wiki/50864/REC+Schedule+14+%E2%80%93+Metering+Operations>

<sup>10</sup> If the Metering System is registered in the Supplier Meter Registration Service

## 2.3 Audit Results

The results of all audits will be passed to the MSP who in turn will inform the LCCC. If the audit result is a fail, the nature of the breach of the Metering Compliance Obligation and/or the Electrical Schematic Obligation will be detailed. The LCCC will issue the CfD Generator a Metering Breach Notice as per the relevant condition<sup>11</sup> in the CfD Agreement terms and conditions<sup>12</sup>. It will be up to the CfD Generator to resolve this breach or appeal the decision.

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<sup>11</sup> 31.2 in standard terms and conditions, and Private Network Agreement; 30.2 in Investment Contract

<sup>12</sup> <https://www.gov.uk/government/publications/contracts-for-difference-standard-terms-and-conditions>

### 3. Interface and Timetable Information

#### 3.1 Metering Technical Assurance Process

The MSP acting on behalf of the LCCC will use an MA to carry out the Metering Technical Assurance Process.

Ref	Condition	When	Action	From	To	Input Information Required	Method
3.1.1		After Start Date and at any time	Provide list of sites to be audited as per EMR Site Testing Volumes and Selection Process	MSP	MA	Details of sites for audits (contact details, address)	Email
3.1.2		Following 3.1.1 (unless unannounced Private Network visit – in which case continue to 3.1.3)	Arrange access for onsite audit  Continue to Metering Access Right Process 3.2	LCCC; OR MA	Generator		Email, Post
3.1.3		On the agreed date for access (From Metering Access Right Process 3.2; OR date agreed with LCCC for unannounced visit on a Private Network)	Perform the Metering Technical Assurance Test	MA			Internal Process
3.1.4		Following 3.1.3 and within 2 WD of receipt of Metered Volumes from date of audit	Report results of audit to MSP.  If the audit has been passed continue to 3.1.8; OR  If the audit has been failed continue to 3.1.5; OR  If the Metering Access Right was not granted continue to 3.2.5	MA	MSP	Submit the results of the audit (template in Appendix 3 – Results Template).	Email

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Ref	Condition	When	Action	From	To	Input Information Required	Method
3.1.5		Following 3.1.4 and within 2 WD	Submit report of results of audit. Detailing the areas where the MA has reported non-compliance on the Facility Metering Equipment	MSP	Generator  LCCC	Audit Results Report	Email
3.1.6		Following 3.1.5 and within 2 WD	Notify BSCCo of SVA or CVA Metering System with an issue affecting the quality of data for settlement purposes	MSP	BSCCo	CfD ID with corresponding MPAN/MSID relating to the applicable SVA or CVA Metering System;  Nature of the non-compliance.	Email
3.1.7	31.2 (30.2 Investment Contract)	Following 3.1.5 and within 2 WD	Notification that the Generator has failed the audit and has a Metering Compliance Obligation Breach, continue to 3.3 CfD Metering Compliance Obligation Breach  <b>END PROCESS</b>	LCCC	Generator	Metering Breach Notice shall include CfD ID and:  (i) which Metering Compliance Obligation the LCCC considers that the Generator has breached; and  (ii) be accompanied by such Supporting Information as the LCCC considers necessary to evidence the breach of the Metering Compliance Obligation.	Email
3.1.8	31.1 (30.1 Investment Contract)	Following 3.1.4 and within 2 WD	Notification that the Generator has passed the audit  <b>END PROCESS</b>	MSP	Generator  LCCC	CfD ID; and  Notification that the Generator has passed the audit. (Metering Compliance Notice example in Appendix 1 – Notification Templates.)	Email

### 3.2 Metering Access Right

This is the process for arranging site access for the purposes of conducting an audit of the Facility Metering Equipment. In the Private Network Agreement LCCC have the right to have access without prior notice (condition 31.16) – this process is only relevant where access is to be arranged with notice given.

Ref	Condition	When	Action	From	To	Input Information Required	Method
3.2.1	31.13 and 31.14; OR 30.11 and 30.12 Investment Contract; OR 31.16 Private Network Agreement	Following 3.1.2 and within 5 WD	Submit a Metering Technical Assurance Site Access Notice to exercise the Metering Access Right.	LCCC; OR MA	Generator	Issue a Metering Technical Assurance Site Access Notice.  Specify who will attend and the date which the Generator must permit the exercise of the Metering Access Right.	Email, Post
3.2.2	31.15; OR 30.13 Investment Contract	Within 10 WD of receipt of notification in 2.2.1 if the Generator is the Registrant of the Facility; or within 15 WD of receipt of notification in 3.2.1 if the Generator is not the Registrant of the Facility	Arrange access to the Facility and notify that the proposed inspection date is acceptable	Generator	LCCC; OR MA	CfD ID	Email
3.2.3		Following 3.2.2	Where LCCC have arranged access, notify MA and MSP of date	LCCC	MA MSP	CfD ID; Date of site audit	Email

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Ref	Condition	When	Action	From	To	Input Information Required	Method
3.2.4	31.13; OR 30.11 Investment Contract	On the date specified on the Metering Inspection Notice	If the Metering Access Right is granted by the Generator continue to 3.1.3 (Metering Technical Assurance Process)  If the Metering Access Right is not granted by the Generator continue to 3.2.5	MA	MSP	Report on the non-access to the Facility Metering Equipment	Email
3.2.5	31.13	Following 3.2.4 and within 2 WD	Notify that the Generator is in breach of the Metering Access Right  Request Generator proposes new date for audit	MSP  LCCC; OR MA	LCCC  Generator	Notification of Metering Access Right breach  Request to Generator to provide date for audit	Email  Email
3.2.6	31.17 [31.19 in Private Network] [30.15 in Investment Contract]	Following 3.2.5	Notify Generator they are in breach of the Metering Access Right and they must allow access. Send a Metering Inspection Notice.  The LCCC may suspend payment of Net Payable Amounts in any period the Generator is in breach of the Metering Access Right.	LCCC	Generator EMRS (If payment suspended by LCCC)	Metering Access Right notification; Date of failed visit. Metering Inspection Notice <sup>13</sup> If applicable notify the Generator of: Its intention to suspend payment of any Net Payable Amounts; and The date from which it proposes to effect such suspension. Implement suspension	Post, Email

<sup>13</sup> CfD Standard Terms and Conditions <https://www.gov.uk/government/publications/contracts-for-difference-standard-terms-and-conditions>

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Ref	Condition	When	Action	From	To	Input Information Required	Method
3.2.7	31.18; (30.16 Investment Contract) (31.20 Private Network)	Following 3.2.5 or 3.2.6, as applicable	The Generator grants the Metering Access Right.	Generator	LCCC  MA  MSP	Notification the Metering Access Right will be granted.  Specify the date the Metering Access Right will be granted.	Email, Post
3.2.8		Following 3.2.7 and on the same WD	Confirm date access will be granted	MSP	MA	Date access will be granted	Email
3.2.9	31.13; (30.11 Investment Contract) (31.16 Private Network)	On the rearranged date from 3.2.7	If the Metering Access Right is granted by the Generator continue to 3.2.10  If the Metering Access Right is not granted by the Generator send notification to MSP and continue to 3.2.11	MA	MSP	Report on the no access to the Facility Metering Equipment	Email
3.2.10	31.18; (30.16 Investment Contract) (31.15 Private Network)	Following 3.2.9	If applicable the LCCC shall pay any amounts to the Generator which would have been payable but for the operation of 3.2.6. No compensatory interest or default interest shall be payable.  Continue to 3.1.3 (Metering Technical Assurance Process)  <b>END PROCESS</b>	LCCC	Generator  EMRS	Arrange payment.	Email

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Ref	Condition	When	Action	From	To	Input Information Required	Method
3.2.11	31.17 [31.19 in Private Network] [30.15 in Investment Contract]	Following 3.2.9 and within 1 WD	Notify the LCCC that the Generator is in breach of the Metering Access Right	MSP	LCCC	Notification of Metering Access Right breach	Email
3.2.12	31.19; 30.17 Investment Contract; 31.21 Private Network Agreement	20 WDs following the latest permitted date in 3.2.4 for Investment Contract and Standard Terms; OR 10 WDs following the date on which first sought to exercise the Metering Access Right (3.1.3 or 3.2.4 as applicable) for Private Network	If no Metering Access Right has been granted, then a Metering Access Termination Event will have deemed to have occurred.  If a Termination Event has occurred the LCCC shall have the right to give notice to the Generator terminating the Contract for Difference.  Issue a Default Termination Notice, if applicable  <b>END PROCESS</b>	LCCC	Generator  EMRS	If applicable, Default Termination Notice <sup>14</sup>	Email

<sup>14</sup> CfD Standard Terms and Conditions <https://www.gov.uk/government/publications/contracts-for-difference-standard-terms-and-conditions>

### 3.3 CfD Metering Compliance Obligation Breach

The Generator as a result of a site audit has a non-compliance deemed to be currently affecting the Metered Volumes submitted to EMRS.

Ref	Condition	When	Action	From	To	Input Information Required	Method
3.3.1	31.3 (30.3 Investment Contract)	Within 10 WD of receipt of the Metering Breach Notice in 3.1.7 (“Metering Breach Response Notice Period”)	<p>Investigate the compliance breach and respond to the Metering Breach Notice that either:</p> <p>Accepts that there has been a breach continue to 3.3.2</p> <p>Does not accept there has been a breach continue to 3.3.13</p> <p>If no Metering Breach Response Notice is submitted continue to 3.3.13</p>	Generator	LCCC	<p>Metering Breach Response Notice<sup>15</sup></p> <p>If the Generator accepts there has been a compliance breach the Metering Breach Response Notice must include the date from which the Generator accepts the breach occurred.</p>	Email / Post
3.3.2	31.5 (A) [30.5 (A) Investment Contract] [31.7 (A) in Private Network]	<p>Within 15 WD after the later of:</p> <p>The expiry of the Metering Breach Notice Period; or</p> <p>The date on which an Expert makes a determination (CfD Expert Determination Procedure)</p>	<p>Submit a copy of the Metering Remediation Plan</p> <p>If SVA or CVA Metering System this plan will be from the BSC Company responsible for remedying the non-compliance. This is considered to be BSC Party approval</p> <p>If Private Network site LCCC approves plan</p> <p>All Metering Remediation Plans will be checked</p>	Generator	<p>LCCC</p> <p>MSP</p> <p>MA</p>	Metering Remediation Plan	Email

<sup>15</sup> CfD Standard Terms and Conditions <https://www.gov.uk/government/publications/contracts-for-difference-standard-terms-and-conditions>

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Ref	Condition	When	Action	From	To	Input Information Required	Method
3.3.3		Within 2 WD of receipt of Metering Remediation Plan	Analyse Metering Remediation Plan and determine if it will resolve non-compliance:  If Yes continue to 3.3.7; or  If No continue to 3.3.4	MA	LCCC  MSP	Metering Remediation Plan	Email
3.3.4		Same WD as 3.3.3	Notify LCCC / MSP of areas of the Metering Remediation Plan that will not resolve the non-compliance	MA	LCCC  MSP	Details of problem with Metering Remediation Plan	Email
3.3.5		Following 3.3.4 and within 1 WD	Notification of areas of the Metering Remediation Plan that will not resolve the non-compliance	LCCC	Generator	Details of problem with Metering Remediation Plan	Email
3.3.6		Following 3.3.5 and within 5 WD	Submit a revised Metering Remediation Plan to resolve the non-compliance. Continue to 3.3.2	Generator	LCCC MSP MA	Metering Remediation Plan	Email
3.3.7	31.5 (B) (i) [30.5 (B) (i) Investment Contract] [31.7 (B) (i) in Private Network]	As soon as reasonably practicable after the date referred to in 3.3.2 and no later than 60 WD after a BSC Party or MA has approved the Metering Remediation Plan	Implement the Metering Remediation Plan  If SVA or CVA Metering System continue to 3.3.8; or  If Private Network site continue to 3.3.9.	Generator			Internal Process

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Ref	Condition	When	Action	From	To	Input Information Required	Method
3.3.8	31.5 (B) (ii) [30.5 (B) (ii) Investment Contract]	As soon as reasonably practicable after the date referred to in 3.3.2 and no later than 60 WD after a BSC Party has approved the Metering Remediation Plan	Provide written confirmation from the relevant BSC Party that the breach of the Metering Compliance Obligation has been remedied to their satisfaction. Continue to 3.3.9	Generator	LCCC  MSP	Written confirmation from relevant BSC Party	Email
3.3.9	31.5 (C) [30.5 (C) Investment Contract] [31.7 (B) (ii) in Private Network]	Within 5 WD after remedying the breach and no later than 60 WD after a BSC Party or MA has approved the Metering Remediation Plan	Provide written confirmation that the breach of the Metering Compliance Obligation has been remedied.  Investment Contracts continue to 3.3.12; Private Network and Standard Terms and Conditions continue to 3.3.10	Generator	LCCC  MSP	Generator Metering Remediation Notice <sup>16</sup>  Any Supporting Information	Email
3.3.10	31.6 [31.8 in Private Network]	Within 20 WD of receipt of the Generator Metering Remediation Notice	The LCCC may request supporting information in relation to the Generator Metering Remediation Notice.	LCCC	Generator  MSP	Generator Metering Remediation Notice Information Request <sup>16</sup>	Email

<sup>16</sup> CfD Standard Terms and Conditions <https://www.gov.uk/government/publications/contracts-for-difference-standard-terms-and-conditions>

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Ref	Condition	When	Action	From	To	Input Information Required	Method
3.3.11	31.7 [31.9 in Private Network]	Within 20 WD of receipt of the Generator Metering Remediation Notice, or such longer period as specified by the MSP	Submit the requested supporting information in relation to the Generator Metering Remediation Notice.	Generator	LCCC  MSP	Submit supporting information.	Email
3.3.12	31.8 [30.6 Investment Contract] [31.11 in Private Network]	Following 3.3.9 or 3.3.11, as applicable	<p>If the Generator has not satisfied 3.3.8, 3.3.9 and 3.3.11 (as applicable) a Technical Compliance Termination Event will have deemed to have occurred. Inform LCCC; or</p> <p>If the Generator has satisfied 3.3.8, 3.3.9 and 3.3.11 (as applicable) inform LCCC</p> <p>END PROCESS</p>	LCCC  LCCC	Generator  MSP  Generator  MSP	Notification of compliance breach	Email
3.3.13	31.4 (B) [30.4 (B) Investment Contract]	Following 3.3.1	Continue to CfD Expert Determination Procedure defined in WP133 EMR Metering Disputes Resolution Procedure working practice <sup>17</sup> Section 3.4				

<sup>17</sup> <https://emrsettlement.co.uk/publications/working-practices/>

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Ref	Condition	When	Action	From	To	Input Information Required	Method
3.3.14	31.4 (B) [30.4 (B) Investment Contract]	Following completion of the CfD Expert Determination Procedure	Following the determination by the Expert in accordance with the CfD Expert Determination Procedure the LCCC will either:  If there has been a breach of the Metering Compliance Obligation continue to 3.3.15; OR  If there has not been a breach of the Metering Compliance Obligation no further action is required. Continue to 3.3.16	Expert	LCCC  Generator	Determination of the dispute from the appointed Expert.  See CfD Expert Determination Procedure defined in WP133 EMR Metering Disputes Resolution Procedure working practice <sup>18</sup> Section 4.4.	Email
3.3.15		Same WD as 3.3.14	Notify the MSP of the outcome of the CfD Expert Determination Procedure  Continue to 3.3.2	LCCC	MSP	Determination of the dispute from the appointed Expert.	Email
3.3.16		Same WD as 3.3.14	Notify the MSP of the outcome of the CfD Expert Determination Procedure and that original non-compliance was invalid.	LCCC	MSP	Determination of the dispute from the appointed Expert.	Email
3.3.17		Following 3.3.16 and within 1 WD	Notify the MA of the outcome of the CfD Expert Determination Procedure and that original non-compliance was invalid.	MSP	MA	Determination of the dispute from the appointed Expert.	Email
3.3.18	31.1 (30.1 Investment Contract)	Same WD as 3.3.17	Notification that the Generator has passed the audit.  END PROCESS	MSP	Generator  LCCC	CfD ID; and  Metering Compliance Notice (example in Appendix 1 – Notification Templates).	Email

<sup>18</sup> <https://www.emrsettlement.co.uk/publications/working-practices/>

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## 4. Contact Information

For all queries please contact:

Contact Organisation	Contact
Settlement Services Provider (EMR Settlement Ltd)	Telephone: 020 7380 4333 Email: <a href="mailto:contact@emrsettlement.co.uk">contact@emrsettlement.co.uk</a>
Low Carbon Contracts Company (LCCC)	Telephone: 0208 187 9308 Email: <a href="mailto:info@lowcarboncontracts.uk">info@lowcarboncontracts.uk</a>

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## 5. Acronyms and Definitions

A list of acronyms and definitions can be found in the glossary on the EMRS website<sup>19</sup>.

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<sup>19</sup> <https://www.emrsettlement.co.uk/glossary/>

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## 6. Appendices

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### 6.1 Appendix 1 – Notification Templates

#### Metering Technical Assurance Site Access Notice

To: [●] (the “Generator”)

[CMU ID: [●]]

From: [●] (the “Metering Agent”)

[Address]

Dated: [●]

#### CONTRACTS FOR DIFFERENCE – METERING TECHNICAL ASSURANCE SITE ACCESS NOTICE

Dear Sirs,

As per Condition **[30.11 OR 31.13 OR 31.16]<sup>20</sup>** in the agreement dated [●] between you as the Generator and the CfD Counterparty (the “Agreement”) the **[CfD ID: [●]]** is required to undergo a Metering Technical Assurance Test.

Terms and expressions defined in or incorporated into the Agreement have the same meaning when used in this notice.

The Low Carbon Contracts Company (CfD Counterparty) has requested that **[Metering Agent]** carry out the Metering Technical Assurance Test on their behalf.

This notice is a request for site access to perform the Metering Technical Assurance Test on **[Date]**. The **[Generator]** shall arrange access to the Facility Metering Equipment; this includes the Meters, communications equipment, Current Transformers, Voltage Transformers for all metered points.

The representative of the **[Metering Agent]** to conduct the Metering Test will be **[Name]**.

If this date is not suitable the **[Generator]** shall respond to this notice proposing a date within twenty working days of the original requested date for access.

Yours faithfully,

.....

For and on behalf of the **Metering Agent**

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<sup>20</sup> Delate as appropriate: 30.11 Investment Contract; 31.13 Standard Terms and Conditions; 31.16 Private Network

Metering Compliance Notice

To: Low Carbon Contracts Company Ltd (the "**CfD Counterparty**")  
Commercial Team  
Fleetbank House  
2-6 Salisbury Square  
London  
EC4Y 8JX

From: EMR Settlement Limited (the "**CfD Settlement Services Provider**")  
350 Euston Road  
London  
NW1 3AW

Date: [DD Month YYYY]

Dear Sirs,

**CONTRACT FOR DIFFERENCE – FURTHER CONDITIONS PRECEDENT**

We refer to the Contract for Difference dated [DD Month YYYY] between [CfD Generator Company name] (the "**Generator**") and Low Carbon Contracts Company Ltd as the CfD Counterparty relating to the [Project] Project (the "**Agreement**"). Terms and expressions defined in or incorporated into the Agreement have the same meanings when used in this notice.

We further refer you to paragraph 31.13 of the Agreement.

We confirm that, in accordance with our previous discussions relating to paragraph 31.13, if we have been granted access to read, test or verify any relevant data and inspect and conduct tests in respect of the Facility Metering Equipment, we will be able to confirm to you that we consider a Generator to have complied with its Metering Compliance Obligations set out in paragraph 31.1.

We confirm that we have been granted access to read, test or verify any relevant data and inspect and conduct tests in respect of the Facility Metering Equipment. We can accordingly provide you with confirmation that in our view the Generator is compliant with its Metering Compliance Obligations set out in paragraph 31.1.

Yours faithfully

[Insert Name]  
EMR Metering Team  
For and on behalf of  
**EMR Settlement Limited**

Metering Non-Compliance Notice

To: Low Carbon Contracts Company Ltd (the "CfD Counterparty")  
Commercial Team  
Fleetbank House  
2-6 Salisbury Square  
London  
EC4Y 8JX

From: EMR Settlement Limited (the "CfD Settlement Services Provider")  
350 Euston Road  
London  
NW1 3AW

Date: [DD Month YYYY]

Dear Sirs,

**CONTRACT FOR DIFFERENCE – FURTHER CONDITIONS PRECEDENT**

We refer to the Contract for Difference dated [DD Month YYYY] between [CfD Generator Company name] (the "**Generator**") and Low Carbon Contracts Company Ltd as the CfD Counterparty relating to the [Project] Project (the "**Agreement**"). Terms and expressions defined in or incorporated into the Agreement have the same meanings when used in this notice.

We further refer you to paragraph 31.13 of the Agreement.

We confirm that, in accordance with our previous discussions relating to paragraph 31.13, if we have been granted access to read, test or verify any relevant data and inspect and conduct tests in respect of the Facility Metering Equipment, we will be able to confirm to you that we consider a Generator to have complied with its Metering Compliance Obligations set out in paragraph 31.1.

We confirm that we have been granted access to read, test or verify any relevant data and inspect and conduct tests in respect of the Facility Metering Equipment. We can accordingly provide you with confirmation that in our view the Generator is not compliant with its Metering Compliance Obligations set out in paragraph 31.1.

Yours faithfully

[Insert Name]  
EMR Metering Team  
For and on behalf of  
EMR Settlement Limited

## 6.2 Appendix 2 – Onsite Tests

### Correct Energy Measurement Check

To verify that the Metering System is recording the correct amount of energy, checks shall be carried out that compare the primary load with that being recorded by the Metering System. However, due to the possible restrictive physical location of the primary conductors and Plant at an installation, access may be limited. Where this is the case, other suitable methods may be used to determine correct measurement.

Sites installations can be divided up into the following three categories:

- i Low Voltage (LV) whole current;
- ii LV, CT operated; and
- iii High Voltage (HV), CT & VT operated.

Sites that fall into categories (i) and (ii) will prove to be the most accessible for prevailing load checks. Sites in category (iii) may be more difficult to access, but it is often possible to use a clip-on ammeter around the current transformer cables where access to switchgear is restricted.

**Note: When all preferred methods of checking the prevailing load fails, other suitable engineering methods may be adopted to establish correct measurement.**

Methods of establishing primary load (in order of preference):

- i The demand (derived from independently measured primary values) shall be compared to the Meter's instantaneous demand reading for the same period; or
- ii The demand (derived from independently measured secondary values where the primary/secondary ratios can be established) shall be compared to the Meter's demand reading for the same period; or
- iii Where appropriate an alternative measurement device shall be used for comparison with that of the Meter; or
- iv The CfD Generator shall provide the MA with appropriate commissioning records. The MA is required to establish that these details sufficiently verify that the Meter has been proven to be operating correctly during commissioning; or
- v In the event that none of the above is possible, the MA will notify MSP giving the reasons. (This recognises that if (i) to (iv) are not possible additional checks do not add value).

### Consumption Data Comparison Check

The MA shall compare the Metered energy data for one half hour recorded at the time of the Metering Test with the consumption data held by the DC, HHDC or CDCA for that same half-hour period. If the values differ by more than agreed tolerances the MA will note the non-compliance. This check can take place on site or off site at the discretion of the MA and either method forms part of the audit.

The tolerances to be used will be those agreed from time to time by the MSP/LCCC.

In order to obtain and verify stored Meter data values that are eventually transferred to the DC, HHDC or CDCA, it will be necessary to compare with the Meter's (displayed) cumulative advance over the same half hour period. The kWh/MWh value will also be compared with the measured value obtained from the Correct Energy Measurement Check.

This Consumption Data Comparison Check shall take the following format:

- a) Compare the Meter Technical Details provided by the CfD Generator with that observed onsite. Consideration should also be given to Commissioning and historic Proving Test information.
- b) Take a reading (for the dominant Active Energy flow direction at the time) of the cumulative register on the Meter's display at the beginning and end of the same half hour period that is to be downloaded from the Meter's Outstation and requested from the CDCA, HHDC or DC.
- c) Using the Meter Register Multiplier, calculate the true Meter register half hour advance for that half hour period. This cumulative Meter register half hour advance shall also be used to confirm the findings from the Correct Energy Measurement Check where, ideally, the readings for that check were taken within the same half hour period and the load (or generation) was relatively constant during that period. The MA shall use its discretion, bearing in mind the predictability of the load (or generation), where the readings weren't taken in the same half hour period.

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- d) Request the current actual consumption data held by the CDCA, HHDC or DC for the same half hour period and compare the energy recorded by the Meter (cumulative Meter register half hour advance) and its associated Outstation(s) (half hour value) with the energy value held in the CDCA, HHDC or DC systems which will be submitted to EMRS.

One Active Energy channel will be requested. In CfD this will normally be the Active Export channel but where there is a separate demand circuit it will be the Active Import channel.

6.3 Appendix 3 – Results Template

Contracts for Difference Site Audit Report

CFD ID: \_\_\_\_\_

CFD Name: \_\_\_\_\_

Estimate of Overall Accuracy of Metering System: \_\_\_\_\_ %

Metering System Compliant: YES / NO\*

(\* Delete as appropriate)

Details of Non-Compliance

Date of Test: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

Name of person completing test: \_\_\_\_\_