RETAIL ENERGY CODE

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01	Initial Assessment Report
02	Preliminary Change Report
03	Final Change Report

CHANGE REPORT

R0133 – CONSEQUENTIAL CROSS-CODE CHANGE FOR BSC P441 - COMPLEX SITE CLASSES CREATION

CHANGE REPORT	PRELIMINARY
DOCUMENT VERSION	1.0
ISSUED DATE	22/09/2023
DOCUMENT APPROVAL STATUS	NOT YET APPROVED

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL	CHANGE PATH	SELF GOVERNANCE
PRIORITY STATUS	HIGH	URGENCY	STANDARD

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	22/09/2023

LEAD CHANGE ANALYST



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CHANGE OVERVIEW

A Balancing & Settlement Code (BSC) Modification P441 is looking to introduce additional Complex Site classes which would categorise the types of Complex Site, with each having clearly defined criteria within the BSC, whilst also facilitating a new "type" of Complex Site (referred to as a Class 6 Complex Site) to allow approval of "non-standard" complex sites. It will also clarify when the netting of Imports from Exports for multiple Metering Systems registered in Supplier Volume Allocation (SVA) is permitted.

	High Impact: Electricity Suppliers and MEMs
	Medium Impact: DNO's
	Low Impact: n/a

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0133 is **APPROVED** for implementation on 01 April 2024.

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BACKGROUND

1 BACKGROUND

BSC Modification P441 was raised in August 2022 following a recommendation of the BSC Issue 88 Workgroup (which looked to introduce Complex Site classes) and during the initial consideration of the proposal it became clear that there would need to be complimentary changes to the REC and to the Distribution Connection Use of System Agreement (DCUSA). This modification and DCUSA modification DCP424 are consequential changes needed to support P441.

The BSC believes that Complex Sites have great potential to help develop new arrangements to help drive a smart network and achieve a zero-carbon energy system, and that by introducing Complex Site classes it will allow the approval of new types of Complex Sites and will clarify the netting of Imports from Exports for multiple Metering Systems.

The REC will need to reflect these new Complex Site classes, and this Change Proposal will facilitate this by introducing requirements in Schedules 1 – Interpretations & Definitions, Schedule 14 – Metering Operations and amendments to the Consolidated Metering Codes of Practice.

2 PROBLEM STATEMENT

The introduction of new Complex Site classes is needed into the REC to make the solutions under P441 and DCP424 work. Meter Equipment Managers (MEMs) will need to understand what their new obligations are in respect of metering requirements, as well as impacts on any of the metering processes associated with a Complex Site.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As a consumer, I want more choice to take up low-carbon technology and more flexible energy solutions through local energy schemes, such as the Ofgem BEIS Smart System Flexibility Plan and any other future flexibility service provisions that may be developed.
MARKET PARTICIPANT USER STORIES	
M1	For MEMs, I want to remove ambiguity around the current Complex Site arrangements and will facilitate the advancement of community energy schemes.
M2	For Suppliers, I want to encourage more innovation that will lead to the better use of local energy schemes.

4 SUMMARY OF ANALYSIS UNDERTAKEN

A fully formed solution was provided and therefore further analysis was not required.

5 PROPOSED SOLUTION

Where a Complex Site is identified, the REC Schedule 14 – Metering Operations includes a requirement on Meter Equipment Managers to send a Complex site Supplementary Information Form with all the necessary information to enable the Data Collector to collect data from the meter and for that to be shared with all recipients of the Meter Technical Details. This form is re-shared whenever the details or status of the Complex Site change or are updated.

This Change Proposal will require the updating of the Complex Site Supplementary Information Form to include details of the appropriate Complex Site Class.

The REC will also host a jointly produced guidance document with the Balancing & Settlement Code which will provide examples of Complex Site Classes. A Category 3 Change Proposal will introduce the guidance document once this Change Proposal has been approved.

6 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0133 can be found here.

The proposed changes to Schedule 14 – Meter Operations, paragraph 5,

5 Complex Sites

5.1. When the Metering Equipment Manager sends Meter Technical Details and identifies a Complex Site, they shall also provide all required information for the Half Hourly Data Collector, including the Complex Site Class (as detailed below) *to correctly collect data from the Metering Equipment via the Complex Site Supplementary Information Form to each recipient of the Meter Technical Details.*

Complex Site Classes

Classes 1 and 2 - Licensed Exempt Distribution Network

Classes 3 and 4 - Feed through sites and network flows impacting Settlement Meters

Class 5 – Netting of Imports from Export across multiple Boundary Points over the Total System

Class 6 – Non-standard Complex Site

Appendix 2 – Complex Site Supplementary Information Form

Addition of Complex Site Class to form.

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7 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

7.1 REC PARTY IMPACT ASSESSMENTS

Party Impact Assessments were issued to Suppliers, DNOs and MEMs. We received a total of five responses from one Energy Supplier, three MEMs and one Data Collector.

ENERGY SUPPLIERS	• Positive responses were provided to indicate support for the proposal, with no concerns being raised with implementation plans or the scope of the change.
DATA COLLECTORS	• Positive responses were provided, indicating support for the proposal and implementation approach, and raising no concerns with the scope of the change.
METER EQUIPMENT MANAGERS	• Positive responses were provided regarding the implementation approach, and there were no concerns regarding the scope of the change.

8 DELIVERY AGAINST CHANGE PROPOSAL PLAN

All activities have been completed in accordance with the Change Proposal Plan. The Change Proposal Plan can be found here.

9 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIE

9.1 ASSUMPTIONS AND DEPENDENCIES

No.	DEPENDENCY	NOTES	STATUS
	This is a cross-code change with BSC, and therefore implementation is dependent upon the approval of BSC P441	We are working with BSC and monitoring this through the CCSG	Open.

10 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	01/04/2024	**PROPOSED IMPLEMENTATION APPROACH**	BIG BANG

The implementation date and approach are being aligned to that of the BSC Modification P441 and DCP 424

11 BUSINESS CASE ASSESSMENT

11.1 COSTS

There are no central system costs related to this Change Proposal

11.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
INTANGIBLE BENEFITS	• Complex sites have great potential to help develop new arrangements to help drive a smart network and achieve a zero-carbon energy system; however, there needs to be further clarity to the arrangements to give confidence. • As Local Energy Schemes become more popular (which rely on the allowance of netting Imports from Exports across the Total System, it is essential that the rules for when netting should be permitted are clearly defined going forwards. This change facilitates arrangements to help achieve this objective. • This is an enabling change within a wider set of industry changes to deliver changes to introduce Complex Site Classes within the BSC and DCUSA.

11.3 COST BENEFIT ANALYIS SUMMARY

As there are no costs to Central Systems to implement this change, the cost benefit analysis relies on the intangible benefits that this Change facilitates.

12 CASE FOR CHANGE (SELF GOVERNANCE)

The solution is fully formed and appropriate resolves the Problem Statement. There are no central system costs to implement this Change Proposal. The Change forms part of a package of Cross-code industry Changes (in the BSC and DCUSA) that facilitates the introduction of Complex Site Classes which in turn will help develop solutions to facilitate zero-carbon initiatives. On this basis, the Code Manager believes that there is a positive case for change.

13 CODE MANAGER'S RECOMMENDATION

Based on the conclusions in Sections 11 and 12 of this report, and the positive business case the Code Manager considers this change should be made and recommends that the Metering Expert Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and

- **APPROVE** the proposed implementation date of 01 April 2024

14 CONSULTATION PLAN AND NEXT STEPS

The consultation on this Preliminary Change Report for R0133 will be published on the REC Portal on **22 September 2023** and closes on **13 October 2023.** This is timed to coincide with consultations from the BSC and DCUSA to ensure that parties have a holistic understanding of the wider change.

Following consultation, the Code Manager will produce an updated version of this Preliminary Change Report (referred to as the Final Change Report). This will include the outcome of the consultation, setting out a summary of the consultation submissions and the Code Manager's response.

The Final Change Report will be issued to the Metering Expert Panel to make its determination.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
RELATED CHANGE(S)	BSC P441 DCUSA DCP 424

16 GLOSSARY

TERM	DEFINITION
Balancing & Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
BEIS	Government department for Business, Energy and Industrial Strategy
Complex Sites	has the meaning given to that expression in the BSC.
Distribution Connection Use of System Agreement (DCUSA)	means the agreement of that name maintained pursuant to the Electricity Distribution Licences.
Lead Code	Defines which Energy Code will lead the co-ordination of cross-code Changes.
Supplier Volume Allocation (SVA)	has the meaning given to it under the BSC.