CONSOLIDATED CONSULTATION RESPONSES

R0015 – REMOTE COMMUNICATION OBLIGATIONS FOR ELECTRICITY ADVANCED METERS

DATE ISSUED	10/06/2022
RESPONSE DEADLINE	01/07/2022

QUESTION	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
1. Do you agree with the proposed solution? If not, please explain why	EDF Metering Equipment Manager	*Each electricity Metering Equipment Manager shall take all reasonable steps to ensure that the Communications Equipment for each electricity Advanced Meter is active and maintained to provide continuous remote access to electricity consumption data* EDF supports the general principle that MEMs should work collaboratively with DCs and Suppliers such that the meters that they install and / or manage have active telecoms solutions in place where reasonably practicable. However, we highlight a series of issues which would need to be considered in the amendment and, as such, cannot support the amendment in its current form.	• The Code Manager acknowledges that there are outstanding issues regarding communications solutions. Under the new obligation it will be for MEMs, working collaboratively with Suppliers and DCs, to ensure they are progressing the reasonable steps they deem appropriate to rectify gaps in meeting the obligation, in the run up to and beyond the date from which the obligation is effective. • Interoperability for DCs connecting to the meter are covered by the Protocol Approval process in BSCP601. This ensures that HHDCs can communicate

		• To ensure remote communications you need reliable communications equipment and a head end system that supports the technology. As a MEM we don't control the network protocols (TCP/UDP/IPSEC) DC's support when communicating with meters. Should the MEM be penalised if the DC's unable to read the meter due to interoperability issues (Protocols, VPN's…)? We need guidance added to the CoP to ensure other agents support a range of network protocols (not just meter protocols BSCP601) so when MEM's select communications equipment its interoperable with all DC systems. • We inherit sites from other MEM's with bespoke communication systems that are still managed by the pervious MEM/DC. Therefore, continuous remote access isn't always managed by the appointed MEM due to commercial/technology limitations. **We propose that (on de-appointment of a meter) where the outgoing MEM has set up the communications in such a way that it isn't reasonably interoperable with new agents, that they should be compelled to set up the telecommunications in such a way that is able to be remotely read by the newly appointed MEM / DC and should be measured on performance**	with Meters/Outstations and retrieve data for Settlement purposes (which is also usually the data needed for retail purposes). If an HHDC has been protocol approved against a certain Meter/Outstation type, then they should be able to remotely connect to the Meter and meet the requirements of the relevant CoP and BSCP502. • REC Issue, RI-0030, raises the issue of bespoke communications systems and how this is best addressed in the REC. • In the meantime, MEMs should act, as both Gaining and Losing MEM, to ensure continued comms wherever possible, collaborating with other parties as required. • More broadly, BSC Issue 93 is working to address the changing communications landscape and the Code Manager considers this is the right place for this to be managed. Where cross code collaboration and alignment is required, the REC intends to fully support that approach.

		• Has the REC considered the impact of PSTN obsolescence and lack of commercially available fixed line alternatives? As a MEM we strive for secure, encrypted fixed line solutions to replace legacy PSTN connections. However commercially viable solutions available today are limited and will impact our ability to provide fixed line communications for customers. • As a MEM we feel “All reasonable steps” needs to be defined to ensure we have complied with the obligation. What are the exceptions? • We find information sent to us on MTD’s isn’t always accurate and prevents us from communicating with the meters. Will previous MEMs be compelled to support new MEMs with providing accurate comms details and enabling comms where the setup prevents it? • As a MEM we need some leniency for recent gains prior to the effective from dates. You can't gain something and expect to have taken “all reasonable steps” to get it dialling within a month as were reliant on the previous agents support (i.e. APN updates, VPN access). • Outgoing MEMs should actively participate in the process of permitting and enabling the novation of telecommunications lines to new agents rather than ceasing lines, which drives the requirement for a site visit for	• Any changes implemented as a result of Issue 93 will inform what should be then considered reasonable. • The proposal put forward here by EDF is one that is intended to be considered as a solution under RI-0030 and BSC Issue 93. • Paragraph 2.28 of the Metering Operations Schedule compels MEMs to ensure the data in Meter Technical Details is accurate. • The Code Manager reiterates that it is for REC Parties to decide which resolution paths are available at any given time and which are reasonable to follow. The Code Manager will not be defining resolution paths or exceptions. • The Code Manager considers that what will be deemed as reasonable will be relevant at the given time that a meter is being looked at. • The Code Manager will not be specifying acceptable timescales over and above SLAs already set out in the schedule for relevant Market Messages, as each circumstance will

		telecommunications replacement at cost and inconvenience to the customer. • What's the repercussions are if MEM's are unable to comply with the proposed changes? • Will the REC set targets to measure performance? If so what will they be? • I know that a number of parties (mainly suppliers with MEM business like us) have expressed concerns about this change, for example because it is not clear how 'all reasonable steps' in the text above would be interpreted (and by who), and because it is not clear how this would interact with the obligations in the supply licence to establish and maintain communications to AMR meters. What we don't want is to be subject to 'double jeopardy' where the same comms issue is seen as a non-compliance from a supplier and a MEM perspective • As a Supplier we recognise the proposed changes could benefit our obligations and go some way to improving the customer experience, namely that there is likely to be an increase in automated accurate data received from advanced meters, and this could increase billing accuracy and therefore reduce complaints. We think the Proposed Solution doesn't take into account industry issues which have been raised and	be different and would have a different measure of reasonability. • There are currently no requirements or SLAs for MEMs for the novation of communications. That this should be considered, including the commercial impacts, will be fed into RI-0030 and BSC Issue 93 for consideration. • No additional REC assurance measures are being introduced as part of R0015. The BSC Obligation is for a Supplier to settle their portfolio and this will be assured by the BSC Performance Assurance Board. They will not assure the obligation for working remote communications although this may be a root cause for poor settlement performance. • The REC obligation will incentivise MEMs to identify and capture where communications aren't working. Although there is no intention at this time, future requests for information or assurance activity to capture this information centrally is possible. • R0015 and RI-0030 sit outside the scope of the MHHS Programme. Any proposed changes to that scope would

		discussed in issue 93 (Remote Communications). The solution needs to consider the issues raised in this issue group (Obsolesce, security, interoperability) and clearly define “all reasonable endeavours”.	need to be progressed through a Change Request to the programme. The Code Manager does not consider this the right approach and maintains the recommendation that the issues being addressed are independent, although an enabler, to the MHHS Programme.
	Total Energies Energy Supplier	We are supportive of the proposed solution to assist with resolution of interoperability issues in the AMR market. It’s a significant risk to the success of MHHS programme.	

2. Do you agree with the proposed implementation date and implementation technique? If not, please explain why	EDF Metering Equipment Manager	No given the issues discussed in Q1, we need clear guidance to enable us to assess the impact to us as a MEM and then advise if the proposed dates are achievable.	• The Code Manager acknowledges that there are circumstances where meeting the obligation may not be possible, but that Parties should be working now to have plans in place to address sites without working communications. Documenting where and why meeting the obligation cannot be achieved and future steps that might be taken when circumstances change should be considered.
	Total Energies Energy Supplier	Yes	

3. Do you agree with the proposed legal text? If not, please explain why?	EDF Metering Equipment Manager	The text doesn't define any exemptions and is open to interpretation in its current form. If the REC decide to keep "take all reasonable steps" then clear guidance is needed.	• The Code Manager reiterates that it is for Parties to decide which resolution paths are available at any given time and which are reasonable to follow. The Code Manager will not be defining resolution paths or exceptions.
	Total Energies Energy Supplier	Yes	

4. For Metering Equipment Managers: Within your portfolio, how many Current Transformer (CT) Advanced Meters and Whole Current (WC) Advanced Meters do you manage? Of these, how many have active remote communications? Where possible please provide volumes of sites 'to be resolved' and volume of sites that	Total Energies Energy Supplier	No response	• Responses have provided the Code Manager with a very limited view of volumes

are known 'No Communications'			

5. Please provide indicative breakdown of costs associated with meeting the obligation?	Total Energies Energy Supplier	There are OPEX costs for managing deployment and BAU activities but hard to scope for this obligation.	• The Code Manager acknowledges that there will be operational costs however considers that MEMs should already be expected to incur these costs.

6. Does the proposal make it clear what is expected for a meter to have 'active Communications Equipment' for the purposes of R0015?	EDF Metering Equipment Manager	No, as a MEM we can have "active" communications that we can access to retrieve data from the meters. This doesn't mean other agents (DC's) can access the meters. I think it needs to be made clear that meter communications are accessible by all DC's.	• The Code Manager has reviewed the CP report to ensure that it is clear that remote access is for data collection by whichever agent is appointed.
	Total Energies Energy Supplier	Yes	

7. Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to	EDF Metering Equipment Manager	Yes we agree the change should be subject to Self-Governance approval by the Metering Expert Panel	• No further comment.
	Total Energies Energy Supplier	Yes	

Self-Governance approval by the Metering Expert Panel?			

8. Based on the Business Case Assessment and Case for Change, do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 4 November 2022? If not, please explain why?	EDF Metering Equipment Manager	Some of the issues raised in question 1 were also raised in Issue 93's 'Remote Communications' Aspect meeting, therefore we believe the REC should wait until the solutions/recommendations in issue 93 agreed before this change.	• The Code Manager considers that what will be deemed as reasonable will be relevant at the given time that a meter is being looked at. Where there are issues that do not yet have a resolution, this should be taken into account as to what steps should be taken at the time. Parties should consider plans for appropriate ongoing review of 'no communications'/ 'to be resolved' sites. • Any changes following BSC Issue 93 recommendations on the technical requirements for installation of communications should inform what is considered reasonable once they have been implemented.
	Total Energies Energy Supplier	Yes	

9. Do you have any other comments relating to this Change Proposal?	EDF Metering Equipment Manager	Some of the issues raised in question 1 were also raised in Issue 93's 'Remote Communications' Aspect meeting, therefore we believe the REC should wait until the solutions/recommendations in issue 93 agreed before this change.	• The MHHS Programme supports the Significant Code View and Ofgem's decision that these meters should be targeted for early migration.
	Total Energies Energy Supplier	While we support the need for this proposal, the idea of it enabling early HHly settlements for a subset of meters is not supported. Suppliers have a lot to deliver as part of MHHS and we are not keen on distractions that might delay or inhibit the bulk of the meters going to MHHS.	