RETAIL ENERGY CODE

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

INITIAL ASSESSMENT REPORT

R0144 – ALLOWING DIFFERENT METERING EQUIPMENT MANAGERS (MEMS) TO BE APPOINTED TO IMPORT AND EXPORT METERING POINTS

DOCUMENT VERSION	V1.0
DATE ISSUED	16/04/2024
DOCUMENT APPROVAL STATUS	APPROVED

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL	CHANGE PATH	AUTHORITY DETERMINED
PRIORITY STATUS	HIGH	URGENCY	STANDARD

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	TO BE DETERMINED

LEAD CHANGE ANALYST



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CHANGE OVERVIEW

The current requirement under the BSC and the REC is that the Metering Equipment Manager (MEM) appointed by the Export Supplier must be the same MEM appointed by the Import Supplier. When Consumers switch to a new Import Supplier, the Export Supplier may become non-compliant with industry regulations if they are unable to appoint the same MEM as the incumbent Import Supplier.

	High Impact: N/A
	Medium Impact: Energy Suppliers, Metering Equipment Managers
	Low Impact: Consumers

1 BACKGROUND

The BSC and the REC require that the Export Supplier have the same MEM appointed as the Import Supplier where the same electricity Metering Asset is being used to measure the Import and Export volumes. The consequence of this is that the Export Supplier needs to be able to contract with every MEM in the market, however MEMs are not obligated to offer contracts to every Supplier.

P459 Allowing different Supplier Agents to be appointed to Import and Export MSIDs has been raised under the BSC as the lead code to address this issue. R0144 has been raised to progress the associated changes under the REC. The first BSC work group was held on 23 February 2024.

It is proposed that this change will only apply to DCC Enrolled Smart Meters, but requirements will be defined throughout solution development.

2 PROBLEM STATEMENT

Export Suppliers may become non-compliant with industry regulations if they are unable to appoint the same MEM as the Import Supplier, for example when the Consumer switches Import Supplier or when the Import Supplier changes the appointed MEM.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As a Consumer, I want a competitive Export market so I can get the best rates for the energy I generate.
C2	As a Consumer, I want clear metering equipment ownership so I can be confident my meter is functional and safe.
C3	As a Consumer, I want accurate billing from my Export Supplier.
MARKET PARTICIPANT USER STORIES	
M1	As an Export Supplier, I want to be able to appoint the MEM that ties in with my commercial strategy.
M2	As a MEM, I want clear guidance on the responsibilities I have for any metering equipment I am appointed to.

4 IMPACTS

CONSUMERS	REC SERVICE PROVIDERS	REC DOCUMENTS / PRODUCTS
Export Consumers	CSS Provider	Metering Operations Schedule

5 MARKET-WIDE HALF HOURLY SETTLEMENTS IMPACTS

MHHS DESIGN	MHHS DATA SPECIFICATION	MHHS CODE DRAFTING
To be determined	To be determined	Metering Operations Schedule

It has been identified that this change will likely only have a solution for post MHHS go live as there is not enough time to develop and implement a solution pre MHHS go live. Throughout solution development, the impact to the MHHS will be carefully considered.

There is currently no solution in place for this change, so it is unknown precisely what impacts there could be to the MHHS design. As part of the MHHS design includes the Data Integration Platform (DIP) automatically appointing the MEM on the Export MSID, the non-compliance element of this change will be resolved upon MHHS go live. Further discussions around the commercial aspects of the Export Supplier being able to appoint a MEM of their choosing will continue under the P459 BSC led work groups and what changes would be needed to the MHHS design considered.

6 CROSS CODE IMPACTS

This Change Proposal is a consequential cross code change as a result of BSC Modification P459 Allowing different Supplier Agents to be appointed to Import and Export MSIDs. The BSC, rather than the REC, is the lead code. As such our Change Proposal Plan will align with that of the BSC.

This change has been and will continue to be discussed at the Cross Code Steering Group (CCSG) to ensure that any potential impact to other codes such as SEC or DCUSA are captured, and appropriate changes raised.

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7 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	AUTHORITY DETERMINED

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

This change is metering focused, and it is expected that the most changes will be made to the Metering Operation Schedule which is owned by the Metering Expert Panel. Hence it has been determined they will be the Responsible Committee.

This change will be Authority Determined. It satisfies the criteria for this change path as it will have a material impact on Consumer switching and competition within the market.

8 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	1	27	27
	Retail Markets Impact	Innovation and Market Arrangements	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		2	9	18
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		1		8
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	2	10	20
				Overall Priority Score (rounded)	157

Priority Status	HIGH

Change Proposal Type	STANDARD

This change has been deemed as having a high priority score of 157 and change proposal type of standard. While only having an indirect Consumer impact, it does have a medium impact on market arrangements, REC operational effectiveness and efficiencies, and legal and regulatory compliance.

9 SUMMARY OF CHANGE PROPOSAL PLAN

The Code Manager will be attending the BSC P459 work groups and ensuring that there is alignment between the REC and BSC timelines when that timeline becomes available. The full timeline of work groups or number of work groups required has not yet been established, so this solution development window may be extended to align with the BSC.

	FROM	TO
SOLUTION ANALYSIS AND DEVELOPMENT	23/02/2024	30/06/2024

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10 GLOSSARY

TERM	ACRONYM	DEFINITION
Balancing and Settlement Code	BSC	BSC, means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
Consumer		means any person supplied (or seeking a supply) of Energy at an RMP (whether or not that person also exports or is seeking to export electricity at an RMP).
Data Communications Company	DCC	means the person holding the DCC Licence.
Data Integration Platform	DIP	defined by the MHHS Programme as the new message orientated event-driven middleware component that will support the flow of events and messages between industry participants
Export		means electricity which is exported from a Premises.
Import		means electricity which is imported to a Premises.
Metering Asset		means: (a) in relation to gas, all the components of a meter installation and ancillary equipment, as defined in IGEM/G/1 edition 2; or (b) in relation to electricity, means the equipment associated with a particular meter, including the meter itself and any related Current Transformer (CT) and/or Voltage Transformer (VT), communication and/or control equipment, as may be further defined in the BSC.
Metering Equipment Manager	MEM	means, as applicable, either: (a) for electricity, the 'Meter Operator Agent' (as defined in the BSC) Appointed by an Electricity Supplier; or (b) for gas, the 'Meter Asset Manager' (as defined in the UNC) Appointed by the Gas Supplier.
Market-wide Half Hourly Settlement	MHHS	Market Wide Half-Hourly Settlement will utilise the ability of smart meters to record a customer's usage during each half hour period to move domestic and small non-domestic customers to half-hourly settlement. Medium and larger non-domestic consumers have been settled half-hourly since BSC modification P272.
Smart Meter		means a meter which conforms (or is intended to conform) with the SMETS.

Supplier		means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Switch		means a change to the Registered Supplier for an RMP.