RETAIL ENERGY CODE

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# NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

## R0150 – ON-SITE AGGREGATION AS A METHOD TO FACILITATE THIRD PARTY ACCES (BSC P455)

On 22 March 2024 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0150.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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| **DOCUMENT VERSION** | 1.0 |
| **RESPONSE TYPE** | NON-CONFIDENTIAL |
| **DATE ISSUED** | 22 March 2024 |
| **RESPONSIBLE COMMITTEE** | Metering Expert Panel (MEP) |
| **LEAD ANALYST** | James Hardy |

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| **DATE CONSULTATION ISSUED** | 22/03/2024 |
| **RESPONSE DEADLINE** | 16/04/2024 |

| Question 1: | Do you agree the Proposed Solution resolves the problem statement? If not please provide rationale. | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| ENGIE<br>(Energy Supplier) | Yes. The proposed solution is consistent with the requirements of the P455 BSC change. | |
| Stark<br>(Metering Equipment Manager) | Yes. Agree that the proposed solution will ensure that metering equipment for those on Private Networks can be effectively repaired and a maintained, allowing a MEM to rectify any faults found with the sub-meters, including installations, used in the On-Site Aggregation solution, which will facilitate third party access, & assist in enabling consumers on Private Networks access to greater choice and flexibility of their supplier. | |
| IMServ<br>(Metering Equipment Manager) | Assuming all the meters on-site are fully supported by the MEM, then yes. However, considerations should be given to the meter manufacturer/model, if the metering is not supported by the MEM, they won't be able to complete the task. | Noted. As the REC are not the lead code for this cross-code change, and are not leading on the solution, we will engage with the BSC (lead code) and provide this feedback. |

| Question 2: | Do you agree with the Legal Text document changes in the Proposed Solution? If not, please provide rationale. | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| ENGIE<br>(Energy Supplier) | Yes. | |
| Stark<br>(Metering Equipment Manager) | Yes. | |
| IMServ<br>(Metering Equipment Manager) | It assumes that the MEM will always be able to complete the task, and there is no provision for the scenario where the equipment on-site is not supported by the MEM. | Noted. As the REC are not the lead code for this cross-code change, and are not leading on the solution, we will engage with the BSC (lead code) and provide this feedback. |

| Question 3: | Do you expect there to be an impact on your systems and/or operational processes as a result of implementation of this change? If so, please provide details. | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| ENGIE<br>(Energy Supplier) | There will be a positive impact from a supplier perspective as this change facilitates provision of private network consumption data to the data collector without the need for complex difference metering arrangements involving multiple parties. | Noted. |
| Stark<br>(Metering Equipment Manager) | Not significant. Any requirements are similar to standard operational agreements. | |
| IMServ<br>(Metering Equipment Manager) | No impact to systems. | |

| Question 4: | Do you expect to incur any additional costs (direct or FTE) as a result off system changes required to implement this change? | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| ENGIE<br>(Energy Supplier) | No. | |
| Stark<br>(Metering Equipment Manager) | No. | |
| IMServ<br>(Metering Equipment Manager) | No direct additional costs. | |

| Question 5: | Do you anticipate any benefits to your organisation as result of this change? If so, please provide details. | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| ENGIE<br>(Energy Supplier) | Yes, this change will help facilitate third party access to private networks for suppliers. This will in turn be of benefit to end consumers in private networks who will have easier access to competitive supply offerings. | Noted. |
| Stark<br>(Metering Equipment Manager) | No. | |
| IMServ<br>(Metering Equipment Manager) | The change is placing a new requirement on the MEM because it plugs a gap in the process, from a MEMs perspective there are no benefits. | Noted. |

| Question 6: | Do you agree with the proposed implementation date and approach? If no, please provide rationale. | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| ENGIE<br>(Energy Supplier) | Yes. | |
| Stark<br>(Metering Equipment Manager) | Yes. | |
| IMServ<br>(Metering Equipment Manager) | Yes. | |

| Question 7: | Do you have any other comments relating to this Change Proposal? | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| ENGIE<br>(Energy Supplier) | No. | |
| Stark<br>(Metering Equipment Manager) | No. | |
| IMServ<br>(Metering Equipment Manager) | The solution is only manageable at low volume, if the volume increases significantly the process may become unworkable. | Noted. The REC Code Manager will engage with the BSC (lead code) prior to the publication of the Final Change Report, to further consider the impacts of an increased volume. |