RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED PARTY IMPACT ASSESSMENT RESPONSES

R0164 - REMOVING THE ENUMERATIONS FROM COMMUNICATIONS METHOD DATA ITEM (J0386) TO ALIGN WITH BSC CP 1594

On 25 April 24 the Code Manager issued a Party Impact Assessment to industry to seek feedback on the Preliminary Change Report for R0164.

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

DOCUMENT VERSION	1.0
RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	23 May 2024
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Lydia Bentley

DATE IMPACT ASSESSMENT ISSUED	25 April 2024
RESPONSE DEADLINE	17 May 2024

Question 1:	Do you have any comments on the proposed solution or legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Metering Equipment Manager) Non-Confidential	We understand the rationale behind the process and what it is looking to achieve. However, we are not clear on the statement “one exclusion to this will be the end-dating of the CSD and PSTN as communication methods”, and what this means; does this mean that they are excluded from being removed from the available data set and would still be available? Or is this based on an assumption that they will no longer be a viable communication type post Dec 2025? We believe that the transition from CSD/PSTN will not be complete by Dec 2025 and that these will still be required to be operationally supported as communication methods. We believe that this will be the case due to the remote location of some meters, clarity still required on the strategy of replacement communications methods by suppliers, the volume of 2G dependant Smart meters; which will result in still having to operationally and technically support these methods beyond 2025.	The points highlighted are outside the scope of the REC Change, and, whilst valid, relate to the lead BSC Change 1594. The scope of the REC Change is quite narrow – To remove REC ownership of the enumerations list and pass this to the BSC, so that they can manage the valid data set. As such, the REC Code Manager cannot directly address these points as they relate to management of the enumerations list. The Code Manager is facilitating a conversation between the respondent and the BSC to discuss these concerns; these conversations are ongoing at the time of publication.
IMServ (Data Collector) Non-Confidential	None	n/a
IMServ (Metering Equipment Manager) Non-Confidential	Generally we are supportive of the idea, but this is with the assumption that there is no requirement for MOPs to update any large scale existing comms types and retrigger MTDs. In terms of what the new codes look like, we think it would be beneficial if new codes were made available which incorporated the generation of mobile communications which are being utilised by the metering equipment, for example, we might have IP comms operating on either 2G, 3G, 4G or 5G.	See Scottish Power response.

Question 2:	What impact to your systems and operational processes do you expect as a result of implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Metering Equipment Manager) Non-Confidential	System impacts will require impact assessing. Operational processes could be impacted if CSD/PSTN are no longer valid communication methods in the approved list beyond Dec 2025.	See response to Q1.
IMServ (Data Collector) Non-Confidential	Systems will need to be updated to add in the new comms methods (this is BAU) There will need to be some consideration of whether it is worth implementing end dates for comms methods within any system or just building reporting to detect them and then push for their replacement	See response to Scottish Power Q1.
IMServ (Metering Equipment Manager) Non-Confidential	Changes to our valid sets will be required (simple), but we also suspect that some database packages may need changing.	The Code Manager has discussed this with the respondent and valid data set changes are outside the scope of the REC Change in this instance.

Question 3:	If possible, please provide delivery costs that you might incur as a result of system changes needed to accommodate the proposed solution? Where possible, please provide a breakdown of design, build, test and phases, and ongoing operational costs.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Metering Equipment Manager) Non-Confidential	Requires impact assessment.	The Code Manager would normally expect that during the Party Impact Assessment, respondents who wish to share the impact on their organisation as a result of the proposed solution would conduct activities to do so within this window. I would therefore suggest that if you have not completed an internal impact assessment at this stage (where the Code Manager is concluding it's assessment of REC Parties' impacts), you may still share the outcome of any such future assessment during our planned Consultation period.
IMServ (Data Collector) Non-Confidential	If it is just adding in new comms methods then this is already supported. Significant costs will be incurred if end dates are implemented at system level. Implementing reporting to detect sites will have smaller costs but they cannot be quantified directly.	See response to Q2.
IMServ (Metering Equipment Manager) Non-Confidential	Can't say exactly what is required at this time, but we are not expecting to incur significant costs	Thank you.

Question 4:	Do you believe there to be any additional consequences or impacts, to implementing this solution that should be considered, that the Code Manager has not already identified or addressed?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Metering Equipment Manager) Non-Confidential	In addition to Q1, we would like clarification on the availability of CSD/PSTN as approved communication methods to understand if there is a risk post Dec 2025 of receiving D0001 flows, potential issues to re-energising previously de-energised supplies.	See response to Q1.
IMServ (Data Collector) Non-Confidential	If we just add in new comms methods then there will be no issues, however if we set hard deadlines on old comms methods that still work but cannot be installed then the market as a whole will not be able to cope with the amount of replacements needed.	See response to Q2.
IMServ (Metering Equipment Manager) Non-Confidential	Is not fully clear how Outdated communication methods will be captured and removed i.e. what checks and processes will be in place to identify and manage the transition	See response to Q1.

Question 5:	If possible, please confirm what your expected lead time would be to the deliver system changes for this solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Metering Equipment Manager) Non-Confidential	Impact assessment is required to confirm.	See response to Q3.
IMServ (Data Collector) Non-Confidential	As said above, adding in new comms methods is already in the systems. Other changes would be behind any MHHS work currently ongoing.	Whilst this again is within the scope of the BSC change, the Code Manager can confirm that no changes to the existing valid data set are planned until 2025.
IMServ (Metering Equipment Manager) Non-Confidential	Aug 2024 should be possible	Thank you.

Question 6:	The Code Manager has been asked by the Balancing and Settlement Code (BSC) to target this Change for the extraordinary August release. Please can you give your view on if this achievable for your organisation?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Metering Equipment Manager) Non-Confidential	Impact assessment is required to confirm.	See response to Q3.
IMServ (Data Collector) Non-Confidential	We will be able to support adding of new comms methods immediately. End dating old ones and dealing with the resulting replacement work will not be possible by August, but as no comms methods are ceasing in this calendar year that probable will not have any impact.	The Code Manager can confirm that the BSC do not plan to alter the valid data set as part of the implementation and release of this Change, and the corresponding BSC change. No changes are planned until 2025.
IMServ (Metering Equipment Manager) Non-Confidential	Aug 2024 should be possible	Thank you.

Question 7:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power (Metering Equipment Manager) Non-Confidential	None.	Thank you.
IMServ (Data Collector) Non-Confidential	The list of new comms methods is not granular enough: IP does not cover all the different comms options behind the IP address for example. We have an opportunity to future proof the comms method setup here and we should ensure that we do the best we can with the proposed list.	See response to Q6.
IMServ (Metering Equipment Manager) Non-Confidential	We are making the assumption that only the codes for J0386 will change, and there will be no other changes to the data flows or data flow version numbers.	The Code Manager can confirm that this assumption is correct.