RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	Final Recommendation

CHANGE REPORT

R0207 – IMPORT / EXPORT MOA CHARGING CLARIFICATION

DOCUMENT VERSION	V2.0
PROPOSED IMPLEMENTATION DATE	TBC
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Metering Expert Panel	CHANGE PATH	Authority Determined
PRIORITY STATUS	Medium	URGENCY	Standard
IMPACTED STAKEHOLDERS	Energy Suppliers, MOAs		

LEAD ANALYST (SOLUTION LEAD)	ASSURANCE LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

BSC Mod 459 and REC CP R0144 were raised to allow different Meter Operator Agents (MOAs) to be appointed for the import and export MPANs on a shared meter. One of the justifications for this was to stop export suppliers being charged uncompetitive rates. Both changes have been placed on hold due to the MHHS Programme, so this change has been raised to specifically resolve the charging issue.

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BACKGROUND

1 SUMMARY

This change has been raised to solve part of the problem statement for R0144 - Allowing different Metering Equipment Managers (MEMs) to be appointed to Import and Export Metering Points, which is on hold due to MHHS.

R0144 is looking to resolve 2 problems raised by the Proposer:

1. That it is easy for the Export Supplier to accidentally become non-compliant, if the MOA on the Import MPAN is changed and they are unaware of this. This should be resolved by the MHHS design.
2. That because the Export Supplier has no choice in which MOA they appoint, they must have contracts with every MOA in the market to match the Import MOA. As this reduces competition for Export Suppliers, the Proposer states that they are receiving unfair/inflated charging from Export MOAs.

R0207 has been raised to attempt to solve the second of these points.

2 PROBLEM STATEMENT

Where the same electricity Metering Asset is being used for the measurement of Import and Export for more than one Metering Point, the Export MOA must be the same as the Import MOA. This may result in uncompetitive charging by the MOA, as the Export Supplier has no choice in their appointment.

3 IMPACTS

CONSUMERS
Indirect – Export Consumers

REC PARTIES AND SERVICE USERS
Energy Suppliers (Export)
MOAs

REC DOCUMENTS / PRODUCTS
Schedule 14 – Metering Operations

MHHS DESIGN
No impact

MHHS DATA SPECIFICATION
No impact

MHHS CODE DRAFTING
Indirect impact.

There is indirect impact to the MHHs Code Drafting as this change proposes to add additional wording to Schedule 14 – Metering Operations but does not directly touch or impact the MHHS drafting.

4 CROSS-CODE IMPACTS

There are no cross-code impacts identified with this change.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**29-Aug-24**	**15-Nov-24**
	Code Manager Assessment	August	October
	Impact Assessment	October	November
	Business Case Assessment	November	November

The Code Manager is submitting a plan as far as Party Impact Assessment and Business Case Assessment, as we will use the Party Impact Assessment to determine how many Energy Suppliers are experiencing this as an issue. This will feed into the business case for the change and determine if it should be taken any further.

6 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		1	9	9
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	0	10	0
				Overall Priority Score (rounded)	111

Priority Status	MEDIUM
Change Proposal Type	STANDARD

SOLUTION

7 PROPOSED SOLUTION

The proposed solution is to introduce new legal text into Schedule 14 Metering Operations, which is intended to ensure that both the Import and Export Energy Supplier are charged fairly by the MOA.

At present there are no Performance Assurance requirements for this change as the Code Manager does not feel there is an appropriate way for this to be routinely assured without Parties having to submit confidential, financial data. However, Energy Suppliers will be able to escalate to the Code Manager via their Operational Account Manager (OAM) if they have evidence that MOAs are not compliant with the legal text. This is as per existing REC processes. This will be monitored by the Code Manager and revisited if required.

8 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0207 can be found here.

It proposes the insertion of the sentence “Where the same electricity Metering Asset is being utilised for the measurement of Import and/or Export for more than one Metering Point, the appointed Meter Operative Agent shall, so far as reasonably practicable, treat all Suppliers in the same manner as regards costs charged by it.”

9 APPENDIX

CHANGE PROPOSAL	Link
RELATED CHANGE(S)	REC CP R0144 BSC Modification P459

10 GLOSSARY

TERM	DEFINITION
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Export	means electricity which is exported from a Premises.
Export Metering Point	means a Metering Point which identifies exports from a Location.
Import	means electricity which is imported to a Premises.
Meter Operator Agent (MOA)	means a Party which has Qualified in that role under the Qualification and Maintenance Schedule. Where used in respect of a particular Metering Point, it means the MOA Appointed by an Electricity Supplier in accordance with the Metering Operations Schedule. The MOA is accountable for the installation, replacement, repair and maintenance of electricity Metering Equipment (either itself or by an EMO), and the MOA must also therefore be Accredited under the Metering Accreditation Schedule.
Meter Point Administration Number (MPAN)	means the unique reference number used to identify electricity Metering Points.