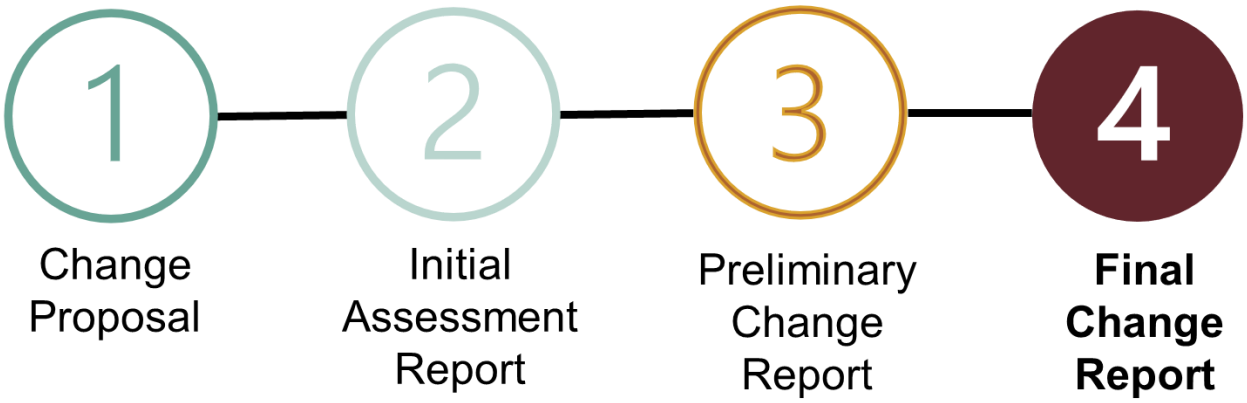
RETAIL ENERGY CODE

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FINAL CHANGE REPORT



PURPOSE:	The Final Change Report sets is the final stage of the Change Proposal, following consultation of the Preliminary Change Report. The Code Manager will set out their final assessment and recommendation, clarifying any changes made from the Preliminary Change Report.
NOTES:	There are three versions of the Final Change Report: one is issued the Responsible Committee for decision; one is published after the vote; and (if Authority Approval is required) one is published after the Authority determination.
NEXT STEPS:	The Final Change Report will be issued to the Responsible Committee who will vote to either approve or reject the Change Proposal, considering the recommendation of the Code Manager.

RETAIL ENERGY CODE

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

FINAL CHANGE REPORT

R0031– ALTERING THE TRIGGER POINTS FOR CT COMMISSIONING

DOCUMENT VERSION	v1.0
DATE ISSUED	10/08/2022
DOCUMENT APPROVAL STATUS	APPROVED BY PANEL

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

LEAD ANALYST	COLETTE BALDWIN	EMAIL

CHANGE OVERVIEW

	High Impact: N/A
	Medium Impact: DNO & MEM
	Low Impact: Electricity Suppliers

An increased use of pre-commissioned Low Voltage (LV) Current Transformer (CT) meters has led to new challenges for the Distribution Network Operator (DNO). When the DNO installs the meter, the current requirement is on the DNO to send commissioning information no later than 5 working days after commissioning. However, this process is not effective when the site is energised at a later date by the Supplier's Metering Equipment Manager (MEM). This Change Proposal looks to amend the trigger point for sending the commissioning information to the energisation status change.

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0031 is **APPROVED** for implementation on 04 November 2022.

RETAIL ENERGY CODE

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RETAIL ENERGY CODE

BACKGROUND

1 SUMMARY

DNOs have raised concerned about the BSC non-compliances they are receiving for not sending the Commissioning information to the MEM and the Registered Suppliers where Low Voltage Current Transformer (LV CT) Pre-Commissioned meters are being installed by the DNO, but where energisation is the responsibility of the Registered Supplier's MEM. The DNOs have worked with the BSC using the Technical Assurance of Metering Expert Group (TAMEG) to identify a solution that retains the urgency to send the information to the requisite parties, but also makes it possible to identify the relevant receiving party, to ensure they have the information at the time it is needed.

2 PROBLEM STATEMENT

The Balancing & Settlement Code Procedure (BSCP) 515 and the Retail Energy Code (REC) Metering Operations Schedule sets out the obligations and timescales imposed on the DNO to send commissioning Information to the MEM (using the D0383 (MM00370) data flow), where the DNO has installed metering equipment, with Measurement Transformers.

When the DNO installs Low Voltage Current Transformer (LV CT) metering units, that have been pre-commissioned off-site, the Commissioning of the units is done before installation and separately to the Energisation of the Supply. When the Energisation status change is the responsibility of the Registered Supplier and is requested of the MEM using the D0134 (MM00021) data flow, notification of the change in energisation status is then sent to the Registered Supplier and the DNO by the MEM, using the D0139 (MM00036).

For an LV fused supply, the DNO may not be aware of who the MEM is to send the commissioning information to via a D0383 (MM00370) until a D0139 (MM00036) is received. This is often the point at which the DNO first becomes aware that a fused supply is now Energised. This may be several days/weeks/months after DNO Commissioning, and it is proving difficult for the DNO to meet their BSC obligations.

3 USER STORIES

REF.	USER STORIES
MARKET PARTICIPANT USER STORIES	
M1	As the DNO, I only want to send the commissioning information using the D0383 (MM00370) when I am made aware that the site has now been energised by the Registered Supplier's MEM for a CT Pre-commissioned meter, so that I can meet my regulatory obligations under the BSC
M2	As a MEM I want to receive the Commissioning information from the DNO in a timely manner to ensure my records are accurate and up to date, and that I can provide the Registered Supplier with information to ensure the metering point is accurately settled.

PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

A Balancing and Settlement Code (BSC) workgroup undertook a review of the non-compliances by DNOs related to the sending of commissioning information, as required by BSC Procedures (BSCP) 515. The review aimed to identify a solution which retained the urgency to make the commissioning information available to the required parties, so that they have the necessary information at the time it is needed.

The workgroup identified that there was an assumption that the identiy of the parties are all known at the time the meter is installed and that energisation happens promptly after installation of the meter. However, the DNOs identified that where there was a gap between installation of the pre-commissioned LV CT meter by the DNO and the subsequent energisation change initiated by the Registered Supplier. As a result, the DNO had to try and track those future Registration by the Supplier and the appointment of their MEM, so that they could then send the necessary commissioning information.

The group concluded that when the DNO is energising the metering point (where the MEM has installed the meter) then relevant parties are already known and there are no problems sending the commissioning information in the existing overall timescales, as set out in the BSC Procedures.

The solution proposed preserves the obligation to send the commissioning information in a timely manner, by linking the requirement to the energisation of the meter, rather than the date of commissioning. The solution retains the overall 21 Working Day timescales from energisation of the meter irrespective of who installs the meter.

5 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

The Preliminary Change Report setting out the impacts was issued to REC Parties for assessment, and the BSC Supplier Volume Allocation Group (SVG) has issued it's own assessment of their cross-code change.

There were no technical changes required as a result of the change, and no impacts on any Retail Risks.

6 DELIVERY AGAINST CHANGE PROPOSAL PLAN

	PLANNED	COMPLETED
PARTY IMPACT ASSESSMENT ISSUED	8/4/2022	8/4/2022
DEADLINE FOR ALTERNATIVE CHANGE PROPOSAL SUBMISSION	8/4/2022	8/4/2022
PRELIMINARY CHANGE REPORT ISSUED	8/4/2022	8/4/2022

All activity has been completed within the planned timescales.

7 ASSUMPTIONS

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
1	A BSC CP is approved by the Supplier Volume Allocation Group on the indicative timeline.	There are no system changes envisaged, either to central systems or party systems.	No Issues were raised during the consultation period.
2	The D0139 (MM00036) is always sent by the MEM to the DNO and the Supplier on completion of the energisation activity.	The MEM will have certainty that the commissioning information should be received 21 Working Days after energisation, and they can escalate any missing. DNOs were asked to consider the potential increased risk that the D0139 (MM000036) may not be sent by the MEM when energising the relevant metering point.	The responses to the Preliminary Change Report confirmed that this was not perceived to be an increased risk by DNOs.

8 PROPOSED SOLUTION

The proposed solution preserves the urgency of the Supplier and the MEM receiving commissioning information within 21 Working Days of the meter being capable of flowing energy where it is pre-commissioned.

No alternates were proposed, as this solution addressed the problem statement with the minimum amount of disruption to parties.

The DNO's and the BSC developed the proposed solution to address the unintended consequences of pre-commissioning meters being installed before energisation.

Where the DNO installs a pre-commissioned LV CT Meters, the DNO will wait for receipt of the D0139 (MM00036) before sending the Commissioning Information (which must be no later than 21 Working Days).

Where the MEM installs the pre-commissioned LV CT Meter, the DNO will energise the meter and send the Commissioning information no later than 21 Working Days after they have energisation the meter.

This Change Proposal was raised in response to a BSC Change Proposal (CP1563) that relates to BSCP515 - Licensed Distribution (which sets out their obligations to provide commissioning information). The Change Plans for BSC CP1563 and R0031 were aligned, decisions will be taken by relevant committees concurrently, and are proposed for implementation in the November Releases for each Code.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0031 can be found here.

The proposed changes to Schedule 14 – Metering Operations are:

- Amend section 6.7.1 to include the date of D0139 (MM00036) receipt from MEM (where the MEM energises) as the trigger point for commissioning timescales.

  It splits out the different trigger points for where the DNO or MEM energises.

- Amend section 6.7.2 to remove the reference to sending the commissioning information no later than 5WD after commissioning (action 6.7.1) and replace it with sending it no later than 21WD after Energisation (if DNO energises) or 21 WD after receipt of D0139 (MM00036) (if MEM energises).

  This allows extra time for the DNO to send the D0383 (MM000370) but retain the existing overall timescale of within 21 WD of Energisation (where the DNO energises) and uses the same timescale where notification of MEM Energisation is via the D0139 (MM00036).

- Amend section 6.7.3, 6.7.5 and 6.7.6 to include the variation trigger point of receipt of D0139 (MM00036) where the DNO energises.

  This prevents the MEM timescale for commissioning being reduced where DNO energises.

10 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	04/11/2022

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

The equivalent change to the BSC is scheduled for implementation in the November 2022 Release. The change has been purposefully been designed to use an existing activity and an existing market message as the new trigger point for the DNO to provide commissioning information. Consequently, the impact to DNOs will only be a process change, so a long lead time is not considered necessary.

11 CHANGE PATH

CHANGE PATH	SELF-GOVERNANCE

12 RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

13 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 08 April 2022 to obtain views on the Preliminary Change report. Link Two responses were received and these responses have been summarised and set out below.

An equivalent BSC consultation has been conducted on change proposal CP1563 which also amends the trigger points for sending commissioning information in BSCP515. The BSC consultation does not close until the 6th May.

Any relevant responses provided to the BSC Consultation that may impact this Change Proposal will be reviewed and an update will be appended to this report for consideration by the Metering Expert Panel to inform their final decision.

ENERGY SUPPLIERS	• 1 Response Received. A question was asked as to whether the DNO should be installing a meter before a Supplier has registered the Metering Point. We clarified that this was in fact a valid scenario, and therefore the proposed solution was appropriate in the circumstances. The supplier was satisfied.
DISTRIBUTION NETWORK OPERATORS	• 1 Response Received

13.1 COMMENTS ON THE SOLUTION

One respondent (a Supplier) queried the circumstances in which a DNO would install a meter in advance of a Supplier and MEM being appointed and whether this was permissible. We have addressed the query with the Supplier and they are comfortable that this scenario is valid and the solution is acceptable.

The other respondent (a DNO) supported the solution.

A specific question was asked of DNO Parties regarding the risk of non-receipt by the DNO of the D0139 (MM00036) from the MEM. The DNO responded stating they recognised the risk and felt that it was minimal and therefore they were happy to support the proposal.

13.1.1 IMPLEMENTATION APPROACH AND DATE

The Implementation of the Proposal is aligned to the equivalent change to the BSC, which is planned for implementation in November 2022.

14 BUSINESS CASE ASSESSMENT

14.1 COST BENEFIT ANALYSIS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
IMPROVEMENTS IN DATA PROVISION TO REGISTERED SUPPLIERS AND THEIR MEM	Improvements should be seen by Suppliers and their MEM in the timely receipt of commissioning information for sites where pre-commissioned LV CT meters were installed by the DNO. They will know when to expect commissioning information to be provided (within 5 Working Days of sending the D0139 (MM00036) market message) and will be able to manage non-receipt, to enable them to get the customer's accounts set up correctly and ready for first bills in a timely manner.
DNO IMPROVEMENT	DNOs will have better information on when they need to send commissioning information where they have installed the pre-commissioned LV CT meter, but are not responsible for the energisation of the meter. Currently, the DNO cannot predict when and from whom they should expect to receive information that a Supplier has Registered the Metering Point and has appointed their MEM. Currently they have to have tracking processes to check periodically for receipt of information which will enable them send the commissioning information. In the future, if the change is approved, the DNO will be able to formalise a process to respond (within 5 Working Days) to a change of energisation status update and send the requisite commissioning information to the Registered Supplier and the MEM.

14.2 COST BENEFIT ANALYIS SUMMARY

As this is a document only change for REC parties, there are no expected costs to implement this change.

Intangible benefits have been identified for both the DNO and the Registered Suppliers and their MEMs, which are set out above.

Additionally, DNOs should expect to improve their own processes and receive fewer non-compliances for their obligations in respect of the relevant sections of BSCP515. While this is not a consideration for the Retail Energy Code per se, it improves the overall case for change for the DNOs.

14.3 CASE FOR CHANGE SELF-GOVERNANCE

The proposed Solution resolves the Problem Statement, and is suitable in that it doesn't require significant development of systems or processes and can be implemented easily and quickly.

The proposal will bring benefits to DNOs, Registered Suppliers and MEMs and will improve timely updating of information, which in turn will improve the customer experience in these particular circumstances.

On the basis of the intangible benefits, the Code Manager considers that there is a positive case for change.

15 CODE MANAGER'S RECOMMENDATION

Based on the evidence in section 13 and 15, the Code Manager considers a positive business case can be made for implementing the solution and recommends the Metering Expert Panel:

- **APPROVE** the proposed change solution.
- **APPROVE** the proposed implementation approach.
- **APPROVE** the proposed implementation date of 04 November 2022

16 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED IMPACT ASSESSMENT	Link