RETAIL ENERGY CODE

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

CHANGE REPORT

R0084 - HOUSEKEEPING CHANGES TO THE APPROVED LEGAL TEXT FOR R0047

CHANGE REPORT	PRELIMINARY
DOCUMENT VERSION	1.0
ISSUED DATE	24/02/2023
DOCUMENT APPROVAL STATUS	PUBLISHED FOR CONSULTATION

RESPONSIBLE COMMITTEE	CHANGE PANEL	CHANGE PATH	SELF GOVERNANCE
PRIORITY STATUS	LOW	URGENCY	STANDARD

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	24/02/2023

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CHANGE OVERVIEW

Since the approval of Change Proposal R0047 - Metering Code of Practice Consolidation Review, the Code Manager has identified a number of typographical errors and housekeeping changes that are needed to the approved legal text, going live on 01 April 2023.

	High Impact: N/A
	Medium Impact: N/A
	Low Impact: Meter Equipment Managers (MEMs), Energy Suppliers, Approved Meter Installers (AMI), Meter Installers (MIs), Distribution Network Operators (DNOs), AMR Service Providers (ASPs) and the Metering Scheme Auditor

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0084 is **APPROVED** for implementation on 01 April 2023, which results in the legal text for R0047 being amended.

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BACKGROUND

1 BACKGROUND

Change Proposal R0047 - Metering Code of Practice Consolidation Review was raised by the Retail Energy Code Company (RECCo) to consolidate the current Metering Codes of Practice into a single set of arrangements that are simplified, proportionate and relevant, which can be monitored via a single audit scheme.

R0047 will remove the four existing Metering Codes of Practice:

- Gas Metering Code of Practice;
- Electricity Metering Code of Practice;
- Automated Meter Reading Service Provider Code of Practice; and
- Smart Metering Installation Schedule.

These will be replaced with the new Consolidated Metering Code of Practice (CoMCoP). R0047 was approved by the Change Panel at their meeting on 15 November 2022 for implementation on 01 April 2023.

Following the approval of the R0047, a number of errors have been identified within the approved legal text. The majority of the identified issues are historical and exist within the current Metering Codes of Practice. As part of the consolidation review, each Paragraph was reviewed for business accuracy, i.e., is an activity still part of a business or technical procedure, however, a full re-write, including the identification and correction of existing typographical and grammatical issues, was not in scope of the RECCo led review or Change Proposal R0047.

To ensure the accuracy of the legal text, and that it reflects the intent of R0047, these errors should be addressed ahead of R0047 being implemented.

The correction of these errors will have no material impact on REC Parties or the Metering Scheme Auditor; therefore, the Code Manager considers that this Change Proposal will only progress housekeeping changes, ensuring the CoMCoP reflects the intent of R0047 when it is implemented on 01 April 2023.

2 PROBLEM STATEMENT

To enable REC Parties to successfully meet the obligations of the CoMCoP, when it is implemented via Change Proposal R0047 on 01 April 2023, the CoMCoP needs to accurately reflect the intention of R0047 and current processes.

3 USER STORIES

REF.	USER STORIES
MARKET PARTICIPANT USER STORIES	
M1	As a DNO, MEM, AMI, ASP or MI, I want all Code of Practice obligations to be clear and transparent, to ensure all obligations placed upon my organisation and operatives are understood and can be met in the most efficient way.
M2	As an Energy Supplier, I want to be confident that my Appointed agents are compliant with all relevant CoP obligations to ensure the safety of my Consumers.
M3	As RECCo, I want the Metering Scheme obligations to be clear and transparent, to ensure the arrangements deliver against the RECCo strategic aims.
M4	As the Metering Scheme Auditor, I want the Metering Scheme obligations to be clear and transparent, to ensure I can deliver against the Service obligations in an efficient and effective manner.

PROPOSAL

4 PROPOSED SOLUTION

During the preparation for the implementation of R0047, following approval of the Change Proposal, a number of issues with the approved legal text were identified.

These errors were highlighted to the external legal adviser to ensure that updates to address these errors would not change existing, or introduce additional, obligations on Parties.

The solution proposes changes to the CoMCoP. The legal text changes will address the following issues:

- **Meter Operative / Meter Installer references** – As part of the consolidation activity, R0047 proposed changing Meter Operative references within the current CoP to Meter Installer within the CoMCoP.
- These terms are not interchangeable, Meter Operative is the correct term to be used, as reflected in the current Metering Codes of Practice. This change will ensure there are no impacts on Parties through the introduction of unintended obligations resulting from the use of an incorrect term.
- The design principles for R0047[1], set out by RECCo, was to not introduce any new or additional obligations. Reverting to the use of Meter Operative supports this principle.
    - **Meter Operative**[2] - means an employee, agent or subcontractor appointed by the MEM.

[1] The design principles can be found within RECCo's CoP Project - Guiding Principles, developed as part of its review and working documents, which can be found here
[2] As defined in REC Schedule 1 - Interpretations and Definitions

- **Meter Installer**[3] - in relation to any Gas Meter, means a person a class or description of persons:
    - (a) possessing the expertise to connect that meter satisfactorily so that the gas supplied through it is duly registered, or a person whose staff have such expertise; and
    - approved in accordance with the Retail Energy Code.

- **Grammatical and Typographical errors** – such as spelling mistakes, incorrect terms, and defined terms not being capitalised.
- **Removing reference to a Crowded Meter Room Co-Ordinator (CMRC)** – the introduction of a CMRC is being proposed under Change Proposal R0043 - Commissioning of Works by the Crowded Meter Room Coordinator (CMRC) to Resolve Issues In Crowded Meter Rooms. R0043 has not yet been approved for implementation, therefore, the reference to the CMRC should not be used. R0043 will identify and, if approved for implementation, progress any necessary changes to the CoMCoP resulting from the proposed introduction of a CMRC.

5 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0084 can be found here.

6 DELIVERY AGAINST CHANGE PROPOSAL PLAN

To date, all planned milestones have been completed within the timescales set out in the Change Proposal plan.

The Change Proposal plan can be found here.

7 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

7.1 ASSUMPTIONS AND DEPENDENCIES

No.	DEPENDENCY	NOTES	STATUS
R0084.PCR.D001	There is a risk that there are other omissions or clarifications required which have not been identified by the Code Manager.	The Code Manager does not propose to delay the progression of this Change Proposal if omissions or further clarifications are identified.	If any items are identified during the progression of this change, these will be included as part of a future Change Proposal.

[3] As defined within Gas Supplier Standard Licence Conditions (SLC 12)

R0084.PCR.D002	Implementation planned within the appeal window.	This change is targeting implementation on 01 April 2023, in line with the start of the new Metering Scheme Year. This implementation date is within the appeal window, which closes on 07 April 2023.	Due the simplicity of this change we do not anticipate any appeals being made, however, should a successful appeal be made the changes to the Schedules will be rolled back across EMAR and the REC Portal.

8 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	01/04/2023	PROPOSED IMPLEMENTATION APPROACH	BIG BANG

The proposed implementation will be “Big Bang” on 01 April 2023 in line with the 2023/24 Metering Scheme year and the introduction of the CoMCoP into the REC.

9 BUSINESS CASE ASSESSMENT

There are no additional costs or impacts identified from this change as its intention is to ensure the accuracy of the legal text, and that it reflects the intent of R0047.

With regard to the Meter Installer references within CoMCoP being reverted to the correct term of Meter Operative, this will ensure there are no impacts on Parties through the unintended introduction of new obligations resulting from the use of an incorrect term.

As there are no costs associated with this Change Proposal, and it will improve the accuracy and clarity of the REC, we consider that a positive business case exists for implementing this Change Proposal.

10 CASE FOR CHANGE

The Code Manager believes there is a positive case for change for this Change Proposal on the basis that:

- The solution is fully formed and appropriately resolves the problem statement by ensuring the CoMCoP accurately reflects the intention of R0047 and current processes when it is introduced to the REC on 01 April 2023;
- The solution does not introduce new Party obligations; and
- There are no identified costs associated with the implementation of this change.

11 CODE MANAGER'S RECOMMENDATION

Based on the evidence in sections 9 and 10 of this report, the Code Manager considers a positive business case can be made and recommends that the Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 01 April 2023.

12 CONSULTATION PLAN AND NEXT STEPS

The consultation on this Preliminary Change Report will be published on the REC Portal on **24 February 2023** and will close on **10 March 2023**.

Following consultation, the Code Manager will produce an updated version of this Preliminary Change Report (referred to as the Final Change Report). This will include the outcome of the consultation, setting out a summary of the consultation submissions and the Code Manager's response.

The Final Change Report will be issued to the Change Panel to make its determination.

13 APPENDIX

CHANGE PROPOSAL	Change Proposal Page
LEGAL DRAFTING	Link to legal text changes

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14 GLOSSARY

TERM	DEFINITION
AMR Service Provider (ASP)	means a business or organisation that offers provision of consumption data from a utility meter collected through an AMR system to a number of parties including Consumers, Shippers, Energy Suppliers, Gas Transporters, DNOs, energy brokers and energy management companies.
Automated Meter Reading Service Providers Code of Practice for Gas Meter (ASPCoP)	means the Code of Practice of that name against which relevant service providers are assessed, pursuant to the Metering Accreditation Schedule.
Code of Practice for Gas Metering Equipment Managers and Approved Meter Installers (MCoP)	means the Metering Code of Practice against which gas MEMs and Meter Installers are assessed, pursuant to the Metering Accreditation Schedule.
Consolidated Metering Code of Practice (CoMCoP)	*As defined within the approved legal text for R0047* means the code of practice against which relevant ASPs, MEMs and MIs are assessed pursuant to the Metering Accreditation Schedule.
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier
Meter Installer	means a Metering Equipment Manager that is approved (or which is seeking approval) as a Meter Installer under the Metering Accreditation Schedule. “Approved Meter Installer” and “AMI” shall be construed accordingly.
Meter Operative	means an employee, agent or subcontractor appointed by the MEM.
Metering Accreditation Schemes Schedule	means REC Schedule 15.
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.
Metering Operation Code of Practice (MOCoP)	means the Meter Operator Code of Practice, against which relevant MEMs are assessed pursuant to the Metering Accreditation Schedule.
Metering Scheme	*As defined within the approved legal text for R0047* means the procedure for approving a person as a Metering Equipment Manager, Meter Installer or Automated Meter Reading Service Provider, including the auditing of such persons and suspension or withdrawal of approval, in each case based on such persons compliance (or non-compliance) with the CoMCoP and as further described in Paragraph 3 of the Metering Accreditation Schedule.