RETAIL ENERGY CODE

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

CHANGE REPORT

R0017 – INVALID REQUESTS FOR SITE TECHNICAL DETAILS

CHANGE REPORT	FINAL
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DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	31/03/2023

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CHANGE OVERVIEW

This Change Proposal seeks to provide clarity to Distribution Network Operators (DNOs) and Metering Equipment Managers (MEMs) on the process for requesting and sending Site technical details as part of meter asset installation, Switch or Change of Agent processes.

	High Impact: N/A
	Medium Impact: Metering Equipment Managers, Distribution Network Operators
	Low Impact: Energy Suppliers

RESPONSIBLE COMMITTEE DECISION

On 07 June 2023, the Metering Expert Panel voted to approve R0017 for implementation on 03 November 2023.

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BACKGROUND

1 SUMMARY

Distribution Network Operators (DNOs) have reported that they are receiving a high volume of requests for Site technical details for Domestic or Microbusiness Sites from newly Appointed Metering Equipment Managers (MEMs) following a Switch or on a change of agent. The proposer believes the majority have no operational value. In addition, the DNOs receive a number of requests for Non-Domestic Sites that not required in all circumstances.

Section 6.6 of the Schedule 14 - Metering Operations requires the DNO to provide the Site technical details, using the D0215 Market Message (MM00117), to the MEM following receipt of a D0170 Market Message (MM00075) where a Half Hourly (HH) metering asset is installed. A MEM can also request the Site technical details at any time following its Appointment, for any Metering Point registered after 6 November 2008, e.g., to gain data where there is a Measurement Transformer at the Site.

The proposer of the change and other DNOs, through the Balancing and Settlement Code's (BSC) Technical Assurance of Metering Expert Group (TAMEG), have also reported that they are receiving high volumes of requests for Site technical details following a Switch or change of agent, resulting in increased workload for DNOs to validate and process these requests. DNOs do not believe that all requests for Site technical details are necessary or required by the MEMs.

The process for requesting Site technical details is also set out in the BSC Procedure 515 - Licensed Distribution. To effectively resolve the issues raised, a single industry solution has been developed and is proposed for implementation in both the BSC and the REC.

This Change Proposal seeks to clarify MEM and DNO obligations when requesting and providing Site technical details. A Change Proposal will be progressed under the BSC to make the associated updates to BSCP515 and the BSC-owned Market Messages, including the D0170, where necessary.

The BSC and REC changes have been aligned to an agreed cross-code timetable. This has resulted in an aligned consultation period and will enable an aligned Responsible Committee decision and implementation date.

2 PROBLEM STATEMENT

Distribution Network Operators (DNOs) have reported that they are receiving a high volume of requests for Site technical details for Domestic and Microbusiness Sites following a Switch or on a change of agent and requests for Non-Domestic Sites that they deem to have no operational value. This has resulted in increased workload for DNOs to validate and process these requests. DNOs do not believe that all requests are necessary or required by the MEMs, therefore, the effort required by the DNOs to process these requests cannot be justified.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As a Consumer I want my existing or new meter to be read regularly to ensure I receive accurate bills.
MARKET PARTICIPANT USER STORIES	
M1	As a Distribution Network Operator, I want to receive appropriate requests for Site technical details.
M2	As a Distribution Network Operator, I want the difference between my obligations and best practice to be clear in relation to provision of Site technical details for Sites with and without Measurement Transformers.
M3	As a Metering Equipment Manager, I want to be provided with Site technical details for all relevant Sites so I can correctly install, commission, and maintain the Metering Equipment.

PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

A review of this issue was conducted by the BSC Issue 99 workgroup. This included the BSC issuing a request for information (RFI) jointly with the REC Code Manager. The purpose of the RFI was to gather Party views on the value of the D0170 and D0215 Market Messages and to determine whether they could be amended or removed entirely. Recommendations to reduce the number of unnecessary requests were also put forward as part of the RFI.

The consolidated responses to this RFI can be found here.

This review concluded that:

- There is value in retaining both Market Messages for use;
- The solution should retain the optional fields within the D0215;
- The footnotes within Schedule 14 – Metering Operations and BSCP515 were not relevant; and,
- There remains an issue to be addressed.

It was also confirmed that of the volumes of D0170 requests (circa 9000 requests per month for the four DNOs that responded), with only 10% of these being deemed to be necessary requests.

5 PROPOSED SOLUTION

The solution for this Change Proposal is a change to legal text only, with no central system technical development. It is anticipated that there will be limited technical change required by REC Parties; to amend any automation MEMs may have in place for the sending of a D0170 to DNOs.

Any other instance of a D0170 being sent, (e.g., MEM to MEM), is out of scope. Although it is more likely that Site technical details are required for Non-Domestic Sites, it is acknowledged that there will be instances where Site technical details will be required for Domestic and Microbusiness Sites that have Measurement Transformers.

The solution has been developed in conjunction with the BSC Issue 99 workgroup, as the proposed changes to Schedule 14 – Metering Operations must align with that of BSCP515. This will ensure Market Participants are not subject to conflicting governance.

The intention of the drafted legal text is to reduce the number of unnecessary requests for Site technical details sent from MEMs to DNOs, by providing clarity that the D0170 should only be sent requesting Site technical where a Measurement Transformer's Ratio, Class and Rating are required, it does this by making the following changes:.

- Removal of footnotes 18 and 34. These create more ambiguity about the circumstances when a D0170 requesting the Site technical details is required.
- Amendment to footnote 55, this further clarifies the circumstances in which a request for Site technical details is valid, and when a D0170 should be sent to the DNO.
- Changes will need to be made to the interface table:
    - 6.6.2 – to specify that a D0170 should only be sent when required. A link to current footnote 55 (this will become 53) has also been added to improve clarity.
    - 9.8.12 - A link to current footnote 55 (this will become 53) has also been added to improve clarity.
    - 9.9.10 - A link to current footnote 55 (this will become 53) has also been added to improve clarity.
- Consequential changes to the numbering of Paragraphs and footnotes following the removal of process steps and footnotes.
- Paragraph 2.32 - to clarify the values that should be used when an invalid CT Ratio or VT Ratio has been received.

6 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0017 can be found here.

7 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

7.1 REC PARTY IMPACT ASSESSMENTS

A REC Party impact assessment targeting Electricity MEMs and DNOs was issued on 13 January 2023 and was open for a period of 15 Working Days. We received six responses: four from DNOs and two from MEMs. The consolidated responses can be found here.

DISTRIBUTION NETWORK OPERATORS	• Three of the four respondents agree that the solution and legal text changes will address the problem statement, however, one DNO advised that, without seeing the BSC change proposal solution, it was not clear that the solution would resolve the issue. • One respondent provided feedback on the legal text drafting, which has been taken into consideration and updates to the legal text have been made to reflect this. • Three of the four respondents stated that there would not be any costs associated with the implementation of the change. • No lead time for implementation was highlighted. • All four respondents provided some level of detail regarding the volume of unnecessary requests for Site technical details they receive, with two DNOs confirming that only between 10% and 33% of requests have, in their opinion, an operational value. Two respondents provided a view on their Full Time Equivalent (FTE) resource required to resolve the unnecessary requests (ranged between 0.2 and 6 FTE)
METERING EQUIPMENT MANAGERS	• Both respondents agree that the solution and legal text changes will address the problem statement. • One respondent identified that there would be a cost associated with switching off automation that triggers D0170s for new connections – this is anticipated to be a small task. • One respondent confirmed that a 3-month lead time would be required for implementation. • One respondent confirmed that they are seeing delays in responses to valid D0170s.

The proposed legal text was updated following impact assessment; however, the changes are aligned with the solution agreed within the Issue Workgroup. The changes were made to present the redlining in a cleaner manner and to improve clarity on the circumstances a D0170 should be sent from a MEM to DNO.

8 DELIVERY AGAINST CHANGE PROPOSAL PLAN

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

The Change Proposal plan can be found here.

9 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

9.1 RISKS AND ISSUES

No risks or issues have been identified.

9.2 ASSUMPTIONS AND DEPENDENCIES

No.	DEPENDENCY	NOTES	STATUS
R0017.PCR.D001	Issue 99 workgroup	The solution for this Change Proposal is dependent on a consistent solution being implemented across the REC and BSC. As such, this Change Proposal is dependent on the recommendation made by the Issue 99 group.	Closed – on 25 January 2023 the Issue 99 workgroup agreed to recommend the progression of the agreed amendments to the REC and BSC respectively.
R0017.PCR.D002	Aligned implementation with the BSC	The processes for sending a D0215 and D0170 Market Message are set out within the REC and BSC. The BSC and REC implementation should be aligned to ensure a consistent process for Market Participants is in place and effective.	Closed – following consultation, the REC legal text changes have been finalised and are consistent with the changes to the BSC.

10 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	03/11/2023

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

The proposed implementation date of 03 November 2023 will allow sufficient lead time for impacted Parties to prepare for the implementation.

The REC and BSC implementation will be aligned, this will ensure that there is no conflicting obligations or processes across the codes. The proposed implementation date has been agreed with the BSC and will be reflected in the BSC change timetable.

A phased implementation approach is not required as this is a change to legal text only, without technical changes required to central systems. A big bang implementation is therefore proposed.

11 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 14 April 2023 to obtain views on the Preliminary Change report, which can be found here.

In total seven responses were received from three DNOs and four MEMs. The responses have been consolidated and comments provided by the Code Manager. This can be found here.

One response contained anonymous elements, this response has been anonymised in full and included within the consolidated responses.

The key themes from these responses have been summarised and set out below.

11.1 SUMMARY OF RESPONSES

11.1.1 COMMENTS ON THE SOLUTION AND LEGAL TEXT

Six of the seven respondents agreed with the proposed solution and that this delivers the recommendation from BSC Issue 99 workgroup.

One respondent agreed in part, that the solution achieves the desired outcome but disagreed with the approach as this places onus on the MEMs to resolve.

Feedback on the legal text changes was provided by three respondents. This feedback has been reflected in the revised legal text published together with the Final Change Report.

One respondent identified differences between the REC and BSC solutions.

11.1.2 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

Six of the seven respondents agreed with the case for change and Code Manager's recommendation.

One respondent highlighted that the change resulted in MEM effort to resolve, what they saw as, a DNO workflow management issue, resulting in MEM effort for no MEM benefit.

11.1.3 IMPLEMENTATION APPROACH AND DATE

Three MEMs provided a response to the question asking whether, as a MEM, they would be updating any automation that is currently in place. All three MEMs confirmed that they would make changes to either update or switch off automation as part of their implementation.

All respondents agreed with the proposed implementation date.

12 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

DOCUMENT	SECTION	AMENDMENT	REASON
Schedule 14 – Metering Operations	2.32	It was assumed the use of 'unknwn' within the Paragraph was a typographical error, however, this is the value that should be used when an invalid CT Ratio has been received in Meter Technical Details. The text of 2.32 has been updated to clarify the values that should be used when an invalid CT Ratio or VT Ratio has been received.	Following feedback provided in the consultation.
Schedule 14 – Metering Operations	6.6.2	Optional for Supplier Serviced Metering Assets has been removed from the text. The step within the process is optional for all metering types, therefore, this has no operational value.	Following feedback provided in the consultation.
Schedule 14 – Metering Operations	Footnote 53	Further changes have been made to the footnote, to reflect that there are further scenarios where it is appropriate to request Site technical details, not solely when the Site Technical Details have not been provided.	Following feedback provided in the consultation.

13 BUSINESS CASE ASSESSMENT

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
Legal text clarity	The legal text within the schedules of the REC should be clear on the requirements it puts upon its Parties, as such, the removal of the footnotes within Schedule 14 – Metering Operations improves the clarity of the REC by removing unnecessary steps.
Time and resources	A more efficient use of the DNO resources; rather than being utilised to respond to unnecessary requests for Site technical details, resources can be utilised to resolve valid and necessary requests in a timelier manner. This in turn would have positive impacts on MEMs through timelier responses to D0170s and a reduction in manual effort to resolve missing responses and rejections.

13.1 COST BENEFIT ANALYIS SUMMARY

The intention of this Change Proposal is to reduce the volume of unnecessary D0170s sent from MEMs to DNOs, by reflecting that requesting Site technical details is not required in all circumstances.

If this Change Proposal is implemented, it will remove any uncertainty about the specific circumstances in which a D0170 should be sent by the MEM to the DNO, resulting in a significant reduction in the volume of unnecessary requests for Site technical details. This will reduce inefficiencies currently being experienced by DNOs, which in turn would have positive impacts on MEMs.

The respondents to the impact assessment identified that they believe currently only between 10% and 33% of D0170s received have an operational value. The recent reduction in Switch volumes have been reflected in the volume of unnecessary requests received, with DNOs receiving between 100 and 2,800 unnecessary requests per month in 2022/2023, whereas in 2020/2021, when Switching volumes were significantly higher, one DNO was receiving 13,000 unnecessary requests per month. This equates to between 0.2 and 6 FTE per DNO to respond to unnecessary requests. This resource could be utilised for other 'value adding' activity, including the timelier resolution of necessary D0170 requests, which would have knock on benefits for MEMs.

It is acknowledged there may be costs for MEMs to remove any automation in place for the triggering of D0170s, however this is not expected to be significant. This cost may, in part, be mitigated through the reduction in manual effort to resolve missing responses and rejections.

The Code Manager is satisfied that a positive business case exists for implementing this Change Proposal.

14 CASE FOR CHANGE

The Code Manager considers that there is a case for change to implement this Change Proposal, on the basis that:

- The proposed solution resolves the problem statement.
- The cost and effort of implementing and operating the proposed solution is proportionate and cost-effective.
- The proposed solution delivers efficiencies in the operation of the retail energy market.

15 CODE MANAGER'S RECOMMENDATION

Based on the evidence in sections 11 and 12 of this report, the Code Manager considers a positive business case can be made and recommends that the Metering Expert Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 03 November 2023.

16 RESPONSIBLE COMMITTEE DECISION

This report was published for the Metering Expert Panel to make an ex-committee decision on 07 June 2023.

The Metering Expert Panel voted to:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 03 November 2023.

17 APPENDIX

CHANGE PROPOSAL	Change Proposal Page
LEGAL DRAFTING	Link to legal text
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link to IA responses
CONSOLIDATED CONSULTATION RESPONSES	Link to consultation responses
RELATED CHANGE(S)	BSC Issue 99

18 GLOSSARY

TERM	DEFINITION
Balancing and Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
BSC Issue	Issue – a pre-change process used in the BSC to define and assess an issue(s) and/or solution(s).
Code Manager	means the person described in Clause 7 of the main body of this Code.
Distribution network operators (DNO)	means a person holding an Electricity Distribution Licence.
Half Hourly	refers to electricity being traded and/or settled on a half hourly basis.

TERM	DEFINITION
Market Message	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
Measurement Transformers	means either a Current Transformer (CT) or a Voltage Transformer (VT) or a device carrying out both such functions, whose purpose is to enable the Metering Equipment to operate at a more convenient current and/or voltage than otherwise present.
Metering Equipment Managers (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 Point	has the meaning given to it in the Electricity Distribution Licence, which for the time being means: “the point, determined according to the principles and guidance given in the MRA Transition Schedule to the Retail Energy Code, at which a supply of electricity taken into or conveyed from the licensee’s Distribution System: (a) is or is intended to be measured; or (b) where Metering Equipment has been removed, was or was intended to be measured; or (c) in the case of an Unmetered Supply, is treated as measured.
REC Parties	means each 'Party' under and as defined in the Retail Energy Code. ‘REC Parties’, ‘Parties’ and similar expressions shall be interpreted accordingly.
Site	unless stated otherwise means the area around which the Metering Point is located, in respect of the relevant meter(s) in relation to which a MEM has been appointed to perform meter operation services.
Switch	means a change to the Registered Supplier for an RMP.