RETAIL ENERGY CODE

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REC ISSUE SUBMISSION FORM (COPY)

1 PERSONAL DETAILS

PROPOSER NAME *(Mandatory)*	Jonathan Hawkins
COMPANY *(Optional)*	RECCo
COMPANY TYPE *(Optional)*	Code Body/Administrator
TELEPHONE NUMBER *(Optional)*	
EMAIL ADDRESS *(Mandatory)*	jonathan.hawkins@retailenergycode.co.uk

2 ISSUE SUMMARY

ISSUE TITLE *(Mandatory)*	Review of export meter work arrangements
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	The REC Metering Operations Schedule has limited distinction between the activities for import and export metering. These provisions were not specifically developed to support a market with high volumes of small-scale microgeneration with shared metering assets for import and export. Due to this, there is no recognition of how certain activities should be managed where there is a shared metering asset with separate import and export Suppliers. E.g. whether there are specific services that should only be requested by one of these Suppliers. Industry parties have highlighted the need to review these arrangements to provide clarity on how metering works should be managed and provide clarity for consumers/generators, suppliers and MOAs.
WHAT IMPACT IS THIS HAVING? *(Mandatory)*	Industry parties do not have a consistent approach to managing meter works or investigating meter faults/issues where import/export metering is present. In these scenarios, there may be separate import and

	export suppliers, particularly as not all suppliers are obligated to provide export tariffs via the Smart Export Guarantee. Different Suppliers have different views on how this should be managed. Some consider that meter works should only be requested by the import Supplier. Others consider that the Export Supplier must have a way to investigate and resolve meter faults, particularly where the fault has been reported by the Generator to the Export Supplier. With the proliferation of small-scale metered export supplies, which is expected to increase as Deemed Feed-in Tariff (FIT) Generators are migrated to metered export as part of MHHS migration, this issue is becoming more prevalent and an industry solution is required.
WHAT DO YOU CONSIDER TO BE AN EFFECTIVE SOLUTION? *(Mandatory)*	This issue was discussed as part of the R0207 working group. It was recommended that a review of the arrangements in the Metering Operations Schedule should be taken forward through a separate issue / working group, to identify a clear approach on how meter works should be managed between import and export Suppliers where there is a single import/export meter in place. The outcome of this review should include recommendations on changes to the Metering Operations Schedule, and any other arrangements in the REC, to ensure the processes, systems, interfaces and governance for requesting meter works and investigating meter faults for import/export supplies are clear.
IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE ISSUE THAT WOULD BE USEFUL? *(Optional)*	This issue was initially discussed in the R0207 working group, which was established following R0207 being sent back for further development by the Authority. R0207 is seeking to address the commercial impacts of appointing Export MOA's to an Associated Export Metering Point (where this is linked with an Associated Import Metering Point and the same MOA must be appointed to both Import and Export Metering Points). It was recognised that the need to review the arrangements for meter works would be required regardless of the outcome of R0207, and a decision being made on R0207 is not dependent on this review, which is why it was recommended that this review is progressed separated.

DOES THIS ISSUE RELATE TO AN EXISTING ISSUE RAISED OR AN EXISTING CHANGE PROPOSAL? IF SO, PLEASE PROVIDE DETAILS OF THE ISSUE OR CHANGE PROPOSAL.	R0207 - see above.

3 CONSUMER IMPACTS

WHICH CONSUMER TYPES WILL BE IMPACTED BY THIS ISSUE? *(Mandatory)*	☐ All ☒ Electricity ☐ Gas ☒ Domestic Prepayment ☒ Domestic Credit ☒ Microbusiness ☒ Small and Medium Enterprise (SME) ☒ Industrial and Commercial (I&C) ☐ Other (please specify in the Additional information box below)
WHAT IMPACT WILL THIS ISSUE HAVE FOR THESE CONSUMERS? *(Mandatory)*	☐ Switching experience ☐ Billing accuracy ☒ Trust and confidence ☒ Safety ☐ Security of supply ☐ Ability to pay ☒ On site experience ☐ Achieving Net Zero ☐ Other (please provide details in the Additional information box below)
ADDITIONAL INFORMATION *(Optional)*	Consumers/generators may be impacted where there is difficulty in requesting meter works/meter investigations if the process for the Supplier taking this forward is unclear. This can result in delays to either the acceptance and completion of works or Supplier/industry records being updated through the correct data flows being shared with both Suppliers.

DOES THIS ISSUE CONTRIBUTE TO THE ACHIEVEMENT OF NET ZERO? *(Mandatory)*	
ADDITIONAL INFORMATION *(Optional)*	

4 CODE IMPACTS

Does this Issue relate to or impact:

THE REC OR REC SCHEDULES? *(Optional)*	☐ Main Body ☒ Schedule 1 - Interpretations and Definitions Schedule ☐ Schedule 3 - Accession Agreement ☐ Schedule 4 - Company Governance ☐ Schedule 5 - Change Management ☐ Schedule 6 - Performance Assurance ☐ Schedule 7 - Energy Theft Reduction ☐ Schedule 8 - Unbilled Energy Code of Practice ☐ Schedule 9 - Qualification and Maintenance ☐ Schedule 10 - Charging Methodology ☐ Schedule 11 - Prepayment Arrangements ☐ Schedule 12 - Data Access ☐ Schedule 13 - Transfer of Consumer Data ☒Schedule 14 - Metering Operations ☐ Schedule 15 - Metering Accreditation ☐ Schedule 17 - Secure Data Exchange ☐ Schedule 18 - Green Deal Arrangements ☐ Schedule 19 - Market Exit and Supplier of Last Resort ☐ Schedule 22 - Market Stabilisation Charge ☐ Schedule 23 - Registration Services ☐ Schedule 24 - Switching Data Management ☐ Schedule 25 - Central Switching Service ☐ Schedule 26 - Switching Service Management ☐ Schedule 27 - RMP Lifecycle Schedule ☐ Schedule 28 - Related Metering Points ☐ Schedule 29 - Address Management

	☐ Schedule 30 - Resolution of Consumer Facing Switching and Billing Issues ☐ Schedule 31 – Prepayment Method Levelisation Reconciliation ☐ Schedule 32 - Electricity Supply to Hydrogen Electrolysers ☐ Schedule 33 - Non Domestic Change of Occupier
ADDITIONAL INFORMATION *(Optional)*	

OPERATIONAL DOCUMENTS *(Optional)*	☐ Consolidated Metering Code of Practice (CoMCoP) ☐ Cross Code Steering Group Terms of Reference ☐ Performance Assurance Board Terms of Reference ☐ Performance Assurance Report Catalogue ☐ REC Change Panel Terms of Reference ☐ Smart Meter Installer Domestic Customer Survey ☐ Smart Meter Installer Microbusiness Customer Survey
ADDITIONAL INFORMATION *(Optional)*	

SERVICE SPECIFICATION *(Optional)*	☐ Central Data Service Provider Further Services Service Definition ☐ Central Switching Service Definition ☐ CSS Certificate Authority Service Definition ☐ Electricity Enquiry Service - Service Definition ☐ Electricity Retail Data Service Definition ☐ Gas Enquiry Service Definition ☐ Gas Retail Data Service Definition ☐ Green Deal Database Service Definition ☐ Secure Data Exchange Service Definition ☐ Switching Operator Service Definition
ADDITIONAL INFORMATION *(Optional)*	

API TECHNICAL SPECIFICATION *(Optional)*	☐ EES API Technical Specification ☐ GES Meter Asset Enquiry API Technical Specification ☐ GES Supply Point Switching API Technical Specification ☐ GES Supply Point Enquiry API Technical Specification
ADDITIONAL INFORMATION *(Optional)*	

THE DATA SPECIFICATION *(Optional)*	☐ Data Access Matrix ☒ Data Item Catalogue ☒ Market Message Catalogue ☐ Standards Definition ☐ Supply Number Format
ADDITIONAL INFORMATION *(Optional)*	It is possible that the review of processes may identify new/amended messages (either DIP, DTN or SDEP) or data items to support the agreed process. The working group should consider this as part of the review and the solution.

CENTRAL SYSTEMS OR REC SERVICES? *(Optional)*	☐ Central Data Service Provider Further Services ☐ Central Switching Service (CSS) ☐ CSS Certificate Authority ☐ Electricity Enquiry Service ☐ Electricity Retail Data Service ☐ Electricity Theft Tip Off Service ☐ Gas Enquiry Service ☐ Gas Retail Data Service ☐ Green Deal Central Charging Database ☐ Secure Data Exchange Service ☐ Switching Operator
ADDITIONAL INFORMATION *(Optional)*	

REC PARTIES AND/OR MARKET PARTICIPANTS? *(Optional)*	☐ AMR Service Providers ☐ Data Aggregators ☐ Data Collectors ☐ Data Services

	☐ Smart Meter Data Retrievers ☐ DCC ☐ Distribution Network Operators ☒ Energy Suppliers ☐ EES Users ☐ Gas Transporters ☐ GDCC Users ☐ GES Users ☐ Green Deal Finance Parties ☐ Green Deal Providers ☐ Meter Asset Providers ☒ Metering Equipment Managers ☐ Shippers ☐ Third Party Intermediaries ☐ Virtual Lead Party ☐ Other (please provide details in the Additional Information box)
ADDITIONAL INFORMATION *(Optional)*	It is not clear if there will be impacts to SIPs, but SIP arrangements should be included in the review - e.g. to consider if reports of damage, danger or interference should be reported to a single supplier or both import and export suppliers.

OTHER INDUSTRY CODES? *(Optional)*	☒ Balancing & Settlement Code (BSC) ☐ Distribution Code Use of System Agreement (DCUSA) ☐ Smart Energy Code (SEC) ☐ Uniform Network Code (UNC) ☐ Independent Gas Transporter Uniform Network Code (IGT UNC) ☐ Data Integration Platform (DIP) Rules
ADDITIONAL INFORMATION *(Optional)*	It is not expected that changes to the BSC will be required but it is possible the BSC may have an interest in this review - which will need to be validated with Elexon.

DOES THIS ISSUE IMPACT A SIGNIFICANT CODE REVIEW? *(Optional)*	No

ADDITIONAL INFORMATION *(Optional)*	

5 ISSUE PROGRESSION

DO YOU BELIEVE THIS ISSUE PROPOSAL MEETS THE CRITERIA FOR 'URGENCY' AND SHOULD BE PROGRESSED UNDER AN URGENT TIMETABLE? **IF SO, PLEASE PROVIDE JUSTIFICATION?** *(Optional)*	No
ARE THERE ANY REQUIRED TIMESCALES FOR THE DEVELOPMENT OF THIS ISSUE? *(Option)*	No, but the anticipated migration of a large volume of Deemed FIT sites to Metered Export as part of MHHS Migration should be considered as expediting the need for this review.
ARE THERE ANY REQUIRED TIMESCALES FOR THE IMPLEMENTATION OF THIS ISSUE? *(Option)*	No, but the anticipated migration of a large volume of Deemed FIT sites to Metered Export as part of MHHS Migration should be considered as expediting the need for this review.
ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THIS ISSUE WHICH MAY IMPACT ITS PRIORITY OR PROGRESSION TIMETABLE? *(Optional)*	No, but the anticipated migration of a large volume of Deemed FIT sites to Metered Export as part of MHHS Migration should be considered as expediting the need for this review.

6 ATTACHMENTS

ATTACH/PROVIDE ANY SUPPORTING DOCUMENTS TO BE SUBMITTED WITH THE FORM	