RETAIL ENERGY CODE

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# CONSOLIDATED CONSULTATION RESPONSES

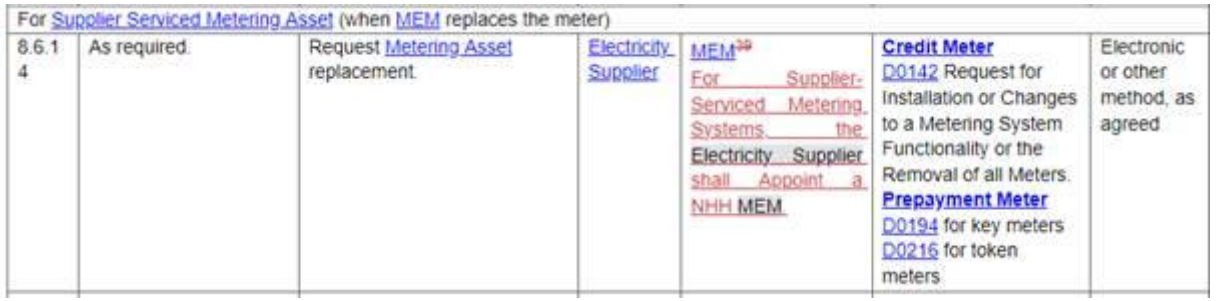
## R0181 SCHEDULE 14 - METERING OPERATIONS FOOTNOTE REVIEW

On 19 June 2024 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0181.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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| **DOCUMENT VERSION** | 1.0 |
| **RESPONSE TYPE** | NON-CONFIDENTIAL |
| **DATE ISSUED** | 11/07/2024 |
| **RESPONSIBLE COMMITTEE** | METERING EXPERT PANEL |
| **LEAD ANALYST** | HOLLY LAW |

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| **DATE CONSULTATION ISSUED** | 19/06/2024 |
| **RESPONSE DEADLINE** | 10/07/2024 |

| Question 1: | Do you agree that the proposed amendments to the ordering of the footnotes are correct? If not please provide details below | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| IMServ Europe Ltd (Metering Equipment Manager) | We have been unable to easily identify any footnotes which have been removed therefore cannot comment on whether we agree with this.<br><br>However of those that we have been able to review (and timescales have unfortunately meant we haven't been able to review all), our only specific comments are with regard to the following one: please note that these are observations only rather than a disagreement.<br><br><br>For Supplier Serviced Metering Asset (when MEM replaces the meter)<br>8.6.14 \| As required \| Request Metering Asset replacement \| Electricity Supplier \| MEM[39] For Supplier-Serviced Metering Systems the Electricity Supplier shall Appoint a NHH MEM \| **Credit Meter** D0142 Request for Installation or Changes to a Metering System Functionality or the Removal of all Meters. **Prepayment Meter** D0194 for key meters D0216 for token meters \| Electronic or other method, as agreed<br><br>a)This is an example of a footnote which we don't believe to be necessary as when talking about SMETS meter exchanges we shouldn't need to remind Suppliers that they need to appoint an NHH MEM i.e.<br><br>b) Also this particular footnote has been added to the D0142 step, whereas you might expect to see it next to the D0155, but the D0155 isn't covered in the section, so this is where it landed. | Agree, will propose to remove this footnote. |

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| SP Energy Networks (Distribution Network Operator) | SPEN agree that the proposed amendments to the ordering of the footnotes is correct | Noted. |
| SSE Energy Supply Ltd (Energy Supplier) | SSE feel the proposed ordering of the footnotes into the main text brings greater clarity to the document. | Noted. |
| Stark (Metering Equipment Manager) | The use of many footnotes in this Schedule 14 were incorrect as they contained essential information that belonged in the main text, and had become out of sequence, which made the text in these sections hard to follow correctly.<br><br>We observed this whilst trying to follow the text to set up internal Gas processes and procedure to be as accurate as possible to ensure our obligations were being fulfilled.<br><br>These proposed amendments do seem to align the relevant information now correctly, however from our perspective there are two outstanding issues in the Gas process:<br><br>1. There is a lack of provision for a switch of MAP scenario without a meter exchange, which we had hoped might be addressed by these amendments. In our meter adoption business model we attempt to purchase the in-situ assets off the incumbent MAP to avoid unnecessary meter exchanges. This was a principle that Ofgem promoted in their 2016 review of competition in the non-domestic gas metering market. The process outlined in Section 11 only envisages a change of MEM where the same MAP stays in place. Whereas Section 12 only envisages a change of MAP occurring alongside a meter exchange.<br><br>2. Additionally, these amendments highlight that there are instances in the Gas processes where commercial arrangements allow Suppliers the choice of notifications to | The issues raised here are out of scope for R0181. These can be raised as a REC Issue and if accepted may be progressed through solution development to a REC Change Proposal. |

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| | receive from a MEM. We feel this is an ambiguous process ie., unclear whether an ONJOB is also required for cancellations and appointments changes or another method and if this is the case will have a significant impact on our internal asset and reporting systems. | |
| National Grid Electricity Distribution (Distribution Network Operator) | We have noted the following:<br>6.5(d) – Footnote 15 within the paragraph needs to be deleted.<br><br>6.7.5 – This section had Footnote 19 appended, however, this has been deleted and Footnote 20 inserted (noted that this is in accordance with RECv2), however, 6.7.7 had footnote 20 and instead now has the narrative from footnote 21 but there is no justification for this change.<br><br>8.7.4 – Suggest take the opportunity to make the narrative gender neutral<br>8.9.3 – Suggest take the opportunity to make the narrative gender neutral<br>8.9.4 – Suggest take the opportunity to make the narrative gender neutral<br><br>9.5.5 – Section has noted that there is a missing footnote 44 however, the narrative from the footnote has not been added to Section 9.5.5<br><br>9.5.7 – Section has noted that there is a missing footnote 45 however, the narrative from the | This has been amended in the legal text, thank you for pointing this out.<br><br>This has been updated as footnote 20 has already been used and footnote 21 is around notification of complete commissioning, which is what this process step is referring to. We believe this to be the correct footnote.<br><br>Agree, this has been updated in the final legal text.<br><br>Text Inserted<br><br>Text Inserted |

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| | footnote has not been added to Section 9.5.7 | |

| **Question 2:** | So that this can be included in the next iteration of MHHS code drafting, the proposed implementation date is the 23 August 2024. Do you agree with this release date? If not, please provide justification. | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| IMServ Europe Ltd<br>(Metering Equipment Manager) | We agree | Noted. |
| SP Energy Networks<br>(Distribution Network Operator) | We have identified no issue with the release date. | Noted. |
| SSE Energy Supply Ltd<br>(Energy Supplier) | SSE fully support this change proposal and the earliest implementation date. | Noted. |
| Stark<br>(Metering Equipment Manager) | Yes | Noted. |
| National Grid Electricity Distribution<br>(Distribution Network Operator) | Yes we agree with the proposed implementation date | Noted. |

| Question 3: | Is there any other information you wish to provide on the solution for R0181? | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| IMServ Europe Ltd<br>(Metering Equipment Manager) | We think REC have made a good effort to move the notes to reasonably appropriate sections. We were not clear whether this exercise included the opportunity to reword some of the footnotes, but appreciate that this may not have been the case or the target date does not allow for this. We make this point only because the end result of inserting the footnotes into the tables is that some sections have become quite wordy, but accept that for whatever reason, this may have been unavoidable. | Rewording of the footnotes was out of scope for R1081. This will be reviewed after March 2025 (MHHS M8) when the Schedule has been separated out for Electricity and Gas processes. |
| SP Energy Networks<br>(Distribution Network Operator) | No further comments | N/A |
| SSE Energy Supply Ltd<br>(Energy Supplier) | Not at this time | N/A |
| Stark<br>(Metering Equipment Manager) | Whilst this is an improvement, and better prepares for MHHS, the proposed future separation of Electricity and Gas processes will significantly add to this solution. | Noted. |
| National Grid Electricity Distribution<br>(Distribution Network Operator) | None | N/A |