RETAIL ENERGY CODE

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

CHANGE REPORT

R0181 – SCHEDULE 14 - METERING OPERATIONS FOOTNOTE REVIEW

CHANGE REPORT	FINAL
DOCUMENT VERSION	1.0
ISSUED DATE	10/07/2024
DOCUMENT APPROVAL STATUS	POST-VOTE

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL	CHANGE PATH	SELF GOVERNANCE
PRIORITY STATUS	HIGH	URGENCY	STANDARD

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	19/06/2024

LEAD CHANGE ANALYST



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CHANGE OVERVIEW

The footnotes within Schedule 14 - Metering Operations are not in the correct place, are missing or no longer relevant. This Change Proposal looks to correct issues within the footnotes and move them into the legal text to prevent this from happening when future Change Proposals impacting this schedule are implemented.

	High Impact: N/A
	Medium Impact: N/A
	Low Impact: All REC Parties

RESPONSIBLE COMMITTEE DECISION

On 19 July 2024, the Metering Expert Panel voted to **APPROVE** R0181 for implementation on 23 August 2024.

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BACKGROUND

1 SUMMARY

Multiple Change Proposals have been implemented that impact Schedule 14 – Metering Operations and as a result of this, the ordering of footnotes has become out of sequence, and some have been deleted in error. As the same footnote appears in multiple process tables throughout the schedule, they can be difficult to follow, and steps may be missed.

As part of schedule drafting for the Market Wide Half Hourly Settlements (MHHS) programme, Schedule 14 is being separated out into gas and electricity, and the error within the footnotes is having a detrimental impact on this.

2 PROBLEM STATEMENT

REC Parties are unable to ensure their processes and procedures correctly reflect their obligations as the footnotes within Schedule 14 - Metering Operations are not in the correct place, are missing or no longer relevant.

3 USER STORIES

REF.	USER STORIES
MARKET PARTICIPANT USER STORIES	
M1	As a REC Party, I need the REC drafting to be accurate, so I can rely on it to ensure my processes and procedures correctly reflect my obligations. If there are mistakes or omissions, then it could cause issues with the effective operation and assurance of the retail energy market.

PROPOSAL

4 PROPOSED SOLUTION

The proposed solution is to correct mistakes within the footnotes, remove what is no longer relevant and move into the body of the legal text. The solution was developed by reviewing each footnote against previous versions of the Schedule, including the original developed as part of Ofgem's Retail Code Consolidation programme (RECv2).

5 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0181 can be found here.

6 DELIVERY AGAINST CHANGE PROPOSAL PLAN

The Change Proposal Plan can be found here.

7 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	23/08/2024

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

So that the changes to Schedule 14 can be included in the next iteration of MHHS code drafting, this change will be included in the next release after approval.

8 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 19 June 2024 to obtain views on the Preliminary Change report. In total 5 responses were received from IMServ Europe Ltd, SP Energy Networks, SSE Energy Supply Ltd, Stark and National Grid Electricity Distribution. The responses have been consolidated and comments provided by the Code Manager. This can be found here.

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

8.1 SUMMARY OF RESPONSES

8.1.1 COMMENTS ON THE SOLUTION AND LEGAL TEXT

All respondents agreed with the proposal of moving the footnotes into legal text. There were some observations made on some of the individual footnotes, which have been addressed and summarised below.

8.1.2 IMPLEMENTATION APPROACH AND DATE

All respondents agreed with the implementation date of the 23 August 2024.

9 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

DOCUMENT	SECTION	AMENDMENT	REASON
Schedule 14 – Metering Operations	8.6.14	Removal of footnote.	Unnecessary footnote as observed by IMServ in their consultation response.
Schedule 14 – Metering Operations	6.5(d)	Foot note 15 in the paragraph has been deleted.	Consultation comment from National Grid Electricity Distribution

Schedule 14 – Metering Operations	8.7.4 8.9.3 8.9.4	Updated to make the narrative gender neutral.	Consultation comment from National Grid Electricity Distribution
Schedule 14 – Metering Operations	9.5.5	Narrative from the footnote has been added to Section 9.5.5	Consultation comment from National Grid Electricity Distribution
Schedule 14 – Metering Operations	9.5.7	Narrative from the footnote has been added to Section 9.5.7	Consultation comment from National Grid Electricity Distribution

10 BUSINESS CASE ASSESSMENT

10.1 COST BENEFIT ANALYSIS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
REC PARTIES	Schedule 14 will correctly reflect the obligations to the REC parties to which they apply.
CODE MANAGER	Removing the footnotes and including the text withing the body of the Schedule will future proof against further alterations in error due to implementation of future changes.

11 CASE FOR CHANGE

11.1 SELF-GOVERNANCE

The Code Manager considers that there is a positive case for change to implement the solution on the basis that:

- the proposed solution appropriately resolves the original Problem Statement
- the proposed solution delivers positive outcomes for REC Parties.

12 CODE MANAGER'S RECOMMENDATION

The Code Manager recommends that the Metering Expert Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 23 August 2024.

13 RESPONSIBLE COMMITTEE DECISION

This report was discussed by an Ex- Committee Metering Expert Panel meeting on 19 July 2024.

The Metering Expert Panel voted to:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 23 August 2024.

14 APPENDIX

CHANGE PROPOSAL	R0181
LEGAL DRAFTING	Legal Drafting

15 GLOSSARY

	DEFINITION
Metering Operations Schedule	means REC Schedule 14.