RETAIL ENERGY CODE

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REC ISSUE SUBMISSION FORM (COPY)

1 PERSONAL DETAILS

PROPOSER NAME *(Mandatory)*	June Mallett
COMPANY *(Optional)*	Drax Energy Solutions Ltd
COMPANY TYPE *(Optional)*	Energy Supplier
TELEPHONE NUMBER *(Optional)*	
EMAIL ADDRESS *(Mandatory)*	june.mallett@drax.com

2 ISSUE SUMMARY

ISSUE TITLE *(Mandatory)*	Smart Meter Installation Surveys - Microbusiness requirements
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	There is no requirement for energy suppliers planning fewer than 5000 Smart meter installations at domestic premises, within a calendar year, to survey consumers for REC compliance purposes. Conversely, there is no minimum threshold in place for microbusiness installations, meaning that non-domestic suppliers are required to procure a suitably qualified, independent Smart Meter Installation Survey Organisation, at considerable cost, to survey what might be a very small number of customers.
WHAT IMPACT IS THIS HAVING? *(Mandatory)*	This misalignment impacts non-domestic suppliers supplying predominantly I&C customers, who are required to procure an independent party for a very small number of installs. This incurs a considerable cost, which is ultimately passed on to customers. This is compounded by the requirement for the organisation to adhere to the Market Research Society Code of Conduct, which makes it less likely that a third-party

	already employed by the supplier can carry out the surveys as an additional task.
WHAT DO YOU CONSIDER TO BE AN EFFECTIVE SOLUTION? *(Mandatory)*	We believe an appropriate threshold should be put in place so that suppliers installing very small numbers of Smart meters at microbusiness premises are not required to provide survey data for customers.
IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE ISSUE THAT WOULD BE USEFUL? *(Optional)*	Not all customers will respond to surveys, which means that the data sample from suppliers installing very small numbers of meters is unlikely to be useful or meaningful. The survey requirements have been in place since the start of the Smart rollout and are based on install rates at that time. We believe they should be reviewed and updated to reflect the current status of the rollout.
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.	I0189 (Voice of the Consumer)

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 ☒ Other (please provide details in the Additional information box below)
ADDITIONAL INFORMATION *(Optional)*	Cost avoidance, as the cost of procuring an independent survey organisation, and associated administration, will ultimately be passed on to customers.

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)*	Clause 20.8 REC Consolidated Metering Code of Practice

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)*	

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)*	

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)*	

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)*	It would be pragmatic to align with I0189
ARE THERE ANY REQUIRED TIMESCALES FOR THE IMPLEMENTATION OF THIS ISSUE? *(Option)*	It would be pragmatic to align with I0189
ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THIS ISSUE WHICH MAY IMPACT ITS PRIORITY OR PROGRESSION TIMETABLE? *(Optional)*	No

6 ATTACHMENTS

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