RETAIL ENERGY CODE

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REC ISSUE SUBMISSION FORM (COPY)

1 PERSONAL DETAILS

PROPOSER NAME *(Mandatory)*	Marc Gasson
COMPANY *(Optional)*	SGN Commercial Services ltd
COMPANY TYPE *(Optional)*	MAM
TELEPHONE NUMBER *(Optional)*	
EMAIL ADDRESS *(Mandatory)*	marc.gasson@sgn.co.uk

2 ISSUE SUMMARY

ISSUE TITLE *(Mandatory)*	Change to Location (A0059) data item within the ONAGE APPT file to MAMs, from 'Optional' to 'Mandatory'
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	Currently, the location (A0059) data item within the ONAGE APPT file from Suppliers to MAMs is Optional, this allows a Supplier to leave this field blank. Currently SGNCS system functionality is designed to reject the file if this field is blank. This is due to SGNCS requiring to hold the location of the meter installation in order to allow us to deliver on our safety obligations as a MAM in maintaining of an asset.
WHAT IMPACT IS THIS HAVING? *(Mandatory)*	Most Suppliers send ONAGE APPT files that always have the location code data item populated, including when it is unknown (unknown code = '00' in the current MDD). However, one Supplier has moved to a new system which is designed to leave this field blank if unknown. This now impacts SGNCS and as a result we are currently rejecting these files, as a mandatory field for us since company go live in 2007 and this leaving the sites MAMless. The sites currently have SGNCS assets installed, which we require MAM appointment

	for. Therefore, these assets are not currently included within our maintenance schedule for planned replacement work for low pressure installations but more importantly five yearly inspections for medium pressure installations are not being conducted, a breach of IGEM/TD/13 . Naturally we are concerned with our safety/MAM requirements and where requested demonstrating this to the HSE.
WHAT DO YOU CONSIDER TO BE AN EFFECTIVE SOLUTION? *(Mandatory)*	Our proposal for your consideration, is to make the Location field (A0059) within the ONAGE APPT mandatory. There is no reason why the field should be left blank. If the location is unknown, the correct code should be used (currently '00'), which exists within the Meter Product General table under MDD.
IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE ISSUE THAT WOULD BE USEFUL? *(Optional)*	We believe the Supplier having the option not to provide the location code does not comply with section 6 of Schedule 22, clauses below - 6.3 Where the GT, MAM or Supplier is the owner of a Data Item, it is responsible for ensuring it holds valid and accurate information in relation to that Data Item. To the extent it becomes aware that information in relation to that Data Item is invalid or inaccurate, it shall send valid and accurate information to other parties as provided for in the RGMA Baseline Processes as soon as reasonably practicable. 6.4 Where the GT, MAM or Supplier is made aware of valid changes to information relating to Data Items for which it is not the owner, it shall update its records accordingly and send this updated information to other parties as provided for in the RGMA Baseline Processes as soon as reasonably practicable. 6.5 In the event the GT, MAM or Supplier has reasonable grounds for assuming the information referred to in Section 6.4 to be inaccurate, it shall notify the owner of this. The Supplier would always hold either a known or unknown location and therefore this should be output on the ONAGE APPT file.
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.	Yes, there is a linked REC project under I0196 Solution Development Working Group – Senior Lead Analyst – Lydia Bentley

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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)*	

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 ☐ Schedule 34 - Migration Schedule
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)*	

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)*	Yes Due to the urgency & importance of MAM appointments adding sites to the maintenance schedule.

SDS ALIGNMENT - HOW CLEARLY THE CHANGE SUPPORTS OFGEM'S STRATEGIC DIRECTION STATEMENT AND HELPS DELIVER SDS PRIORITIES/OUTCOMES. *(Mandatory)*	Believe the SDS (Strategic Direction Statement) in the context of this request in the framework does apply in a strategic long term approach, in the respect of a safety. To allow SGNCS as a MAM maintain meter installations on behalf of a Supplier and the location of a meter helps a MAM identify meters which could be at higher risk for exchange, for example, meters which are installed in a cellar/damp environment and the components would be at higher risk of corrosion to meters installed in a housing.
IMPORTANCE - THE SIGNIFICANCE OF THE BENEFITS OR RISKS ADDRESSED (E.G., CONSUMER OUTCOMES, COMPLIANCE/LEGAL RISK, SYSTEM/OPERATIONAL IMPACTS, MARKET FAIRNESS). *(Mandatory)*	Compliance with Industry standards in the maintainance/life cycle of a metering asset/installation
COMPLEXITY/ DELIVERY CONSIDERATIONS - HOW CHALLENGING IT IS TO DEVELOP AND IMPLEMENT (E.G., SCALE OF CHANGE, STAKEHOLDER ENGAGEMENT REQUIRED, SERVICE/SYSTEM IMPACTS, CROSS-CODE DEPENDENCIES, DELIVERY/TESTING RISK). *(Mandatory)*	There would need to be communication to the Suppliers of this change, so they can make the required change to their systems to ensure the location codes are mapped correctly and output on the ONAGE APPT file.
ARE THERE ANY REQUIRED TIMESCALES FOR THE DEVELOPMENT OF THIS ISSUE? *(Optional)*	As soon as possible, so that we can start accepting ONAGE APPTs that contain the location of the meter installation for our records as part of our safety MAM obligations.
ARE THERE ANY REQUIRED TIMESCALES FOR THE IMPLEMENTATION OF THIS ISSUE? *(Optional)*	As soon as possible, so that we can start accepting ONAGE APPTs that contain the location of the meter installation for our records as part of our safety MAM obligations.
ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THIS ISSUE WHICH MAY IMPACT ITS PRIORITY OR PROGRESSION TIMETABLE?	No

(Optional)	

6 ATTACHMENTS

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