RETAIL ENERGY CODE

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

# PRELIMINARY CHANGE REPORT

## R0012 – HOUSEKEEPING AMENDMENTS TO REC V2

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| **RESPONSIBLE COMMITTEE** | CHANGE PANEL |

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### CHANGE OVERVIEW

This change seeks to update the REC with missing Change Proposals that were implemented in previous codes, prior to the implementation of REC V2, that should have been included in the REC V2 drafting. This change also seeks to correct omissions and typographical errors identified by the Code Manager since the implementation of REC V2.

### CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0012 is **APPROVED** for implementation on 24th February 2022.

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|---|---|
|  | High Impact:<br>None |
|  | Medium Impact:<br>None |
|  | Low Impact:<br>Energy Suppliers, Distribution Network Operators, Gas Transporters, Metering Equipment Managers, Data Collectors, Meter Administrators |

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RETAIL ENERGY CODE

# BACKGROUND

## 1 SUMMARY

REC version 2 was implemented by the Authority as part of the Retail Code Consolidation Significant Code Review and took effect on 1st September 2021. The REC V2 drafting was subject to Switching Programme change control to ensure that changes being made to previous codes would be reflected in the REC V2 drafting.

The Code Manager has identified some Change Proposals, implemented in previous codes, that were not reflected in the REC V2 drafting, as well as other omissions and typographical errors in the Code. These need to be corrected to ensure the REC accurately reflects the provisions migrated from previous codes.

The following Change Proposals were implemented into previous codes but have not been reflected in the REC V2 drafting:

- BSC CP1530 – Introduction of a formalised process for the validation of measurement transformer ratios by Elexon
- BSC CP1534 – Introduce Change of Supplier (CoS) – No Meter Process
- SPAA CP 509 – Changes to Backstop Date
- DTC CP 3572 – Changes to the D0268 (Half Hour Meter Technical Details)
- DTC CP 3578 – Sending UMS HH data from the Meter Administrator to HHDC

Other omissions or errors from the REC V2 drafting were:

- Former MRA Schedule 6 - Appendix 1 (MPAS Non-Functional Requirements) is missing from the MRA Transition Schedule.
- Definition of 'Working Days' references Scottish Bank Holidays and should only reference England and Wales.
- Other typographical and housekeeping updates identified by the Code Manager.

## 2 PROBLEM STATEMENT

The implementation of REC V2, as part of the Retail Code Consolidation SCR, was due to consolidate the existing provisions in other codes into the REC on a like-for-like basis. The Code Manager has identified that there were changes made to previous codes that weren't reflected in the REC V2 drafting that was implemented. This means that the current processes being operated by industry parties are not reflected in the REC.

REC Party's and Service Providers rely on the REC to provide a consistent baseline to ensure the industry operate in an effective and interoperable way. There are currently inconsistencies between the drafting of the REC, and the processes operated by REC Party's and Service

Providers, which could cause issues in the effective operation and assurance of the retail energy market.

## 3 USER STORIES

| REF. | USER STORIES |
|---|---|
| **CONSUMER USER STORIES** | |
| C1 | As an Energy Consumer, I need Energy Companies to operate consistent processes, to ensure my energy supply is managed efficiently and to retain my trust in the functioning of the energy market. |
| **MARKET PARTICIPANT USER STORIES** | |
| M1 | As a REC Party, I need the REC to provide a consistent baseline, so I can operate in an interoperable way with other Market Participants. |

# PROPOSAL

## 4 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

### 4.1 RISKS AND ISSUES

| No. | RISK | NOTES | MITIGATION |
|---|---|---|---|
| **R1** | There is a risk that there are other omissions from the REC that haven't been identified by the Code Manager. | There may be other omissions or inaccuracies in the REC that have not been identified by the Code Manager in this Change Proposal. The Code Manager does not propose to delay the progression of this Change Proposal to complete a full review of all REC Schedules but will continue to review these periodically and address any future issues if they arise. | Since being made aware of these issues, the Code Manager has reviewed previous Change Proposals in the MRA and SPAA, and had meetings with the BSC, to confirm there are no other missing Change Proposals in the REC. If other issues are identified during the course of progressing this Change Proposal, a decision will be made on whether to incorporate these into this Change Proposal, or to include them in a future Change Proposal. |

## 4.2 ASSUMPTIONS AND DEPENDENCIES

| No. | ASSUMPTION | NOTES | HOW/WHEN TO VALIDATE |
|---|---|---|---|
| **A1** | There are no other missing Change Proposals that were not included in the REC V2 drafting implemented by the Switching Programme. | The Code Manager has initially reviewed other recent Change Proposals in the MRA and SPAA, and have had meetings with the BSC, to confirm that there are no other implemented Change Proposals missing from the REC. | This will be validated during the consultation period, to understand if stakeholders have identified any missing Change Proposals that have not yet been reported to the Code Manager. |

# 5 PROPOSED SOLUTION

The following changes have been proposed to REC Schedules:

- Interpretation and Definitions Schedule
  - Change to definition of 'Backstop Date' to reflect solution introduced through SPAA CP 509
  - New definition for 'Non-Half Hourly Metering Point'
  - Remove definition for 'Performance Standards' as this isn't used in the Code
  - Amend definition for 'Working Day' to remove reference to Scottish Bank Holidays
  - Amend erroneous reference to “Electricity Registration Data Service” and “Gas Registration Data Service” to “Electricity Retail Data Service” and “Gas Retail Data Service”
  - Amend definition for “RECCo” to reference Clause 5 of the Main Body, instead of Clause 6.
- Metering Operations Schedule
  - Add new General Requirement for CT Ratio and VT Ratio values to conform to the valid set published by BSCCo to reflect the solution introduced by CP1530
  - Add a new process for Electricity Change of Supplier (No Meter) to reflect the solution introduced by CP1534
- MRA Transition Schedule
  - Add a new Appendix 2 for MPAS Provider Non-Functional Requirements to reflect previous provisions on MRA Schedule 6 - Appendix 1
  - Correct erroneous reference to escalations being sent by email in Appendix B of Section 16, to reference use of the Secure Data Exchange Portal

- Data Access Schedule, Performance Assurance Schedule, Unbilled Energy Code of Practice, Charging Methodology and Metering Accreditation Schedule
    - Correct typographical errors

The following changes have been proposed to the Data Specification:

- Standards Definition
    - Addition of Meter Administrator as a new Market Data Service to reflect the solution introduced by DTC CP 3578
- Market Message Catalogue
    - Amendments to D0268, D0150 and D0313 to reflect the solution introduced by DTC CP 3572
    - Amendments to D0379 to reflect the solution introduced by DTC CP 3578
- Data Item Catalogue
    - Amendments to J0385 and introduction of new Data Items J2263, J2264, J2265 and J2266 to reflect solution introduced by DTC CP 3572

The following changes have been proposed to the Service Specification:

- Electricity Enquiry Service Definition
    - Addition of missing report currently provided to the Code Manager
    - Correction of typographical error

The five Change Proposals that are missing from the REC V2 drafting had impacts on a number of Market Participants which is summarised in the table below. For the avoidance of doubt, these Change Proposals have already been implemented and are in operation and this Change Proposal does not seek to introduce new obligations on Market Participants:

| CHANGE PROPOSAL | IMPACTED MARKET PARTICIPANTS |
|---|---|
| BSC CP1530 – Introduction of a formalised process for the validation of measurement transformer ratios by Elexon | • Electricity Metering Equipment Managers<br>• Distribution Network Operators<br>• Electricity Suppliers<br>• Data Collectors<br>• BSCCo |
| BSC CP1534 – Introduce Change of Supplier (CoS) – No Meter Process | • Electricity Suppliers<br>• Electricity Metering Equipment Managers<br>• Distribution Network Operators<br>• Data Collectors |
| SPAA CP 509 – Changes to Backstop Date | • Gas Suppliers |

| | |
|---|---|
| | • Gas PPMIP |
| DTC CP 3572 – Changes to the D0268 (Half Hour Meter Technical Details) | • Electricity Metering Equipment Managers<br>• Distribution Network Operators<br>• Electricity Suppliers<br>• Data Collectors |
| DTC CP 3578 – Sending UMS HH data from the Meter Administrator to HHDC | • Meter Administrators<br>• Data Collectors |

## 6 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0012 can be found on the Change Proposal Page in the REC Portal or the Change Set in the EMAR.

## 7 PROPOSED IMPLEMENTATION DATE AND APPROACH

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|---|---|
| **PROPOSED IMPLEMENTATION DATE** | 24th February 2022 |

| | |
|---|---|
| **PROPOSED IMPLEMENTATION APPROACH** | BIG BANG |

We propose this change is implemented in the next available standard REC release on 24th February 2022 as the next available REC release to correct these errors and omissions from the REC. This change will not require any change to be made by market participants, as it intends to reflect current market arrangements in the REC drafting.

## 8 CHANGE PATH

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|---|---|
| **CHANGE PATH** | SELF-GOVERNANCE |

## 9 RESPONSIBLE COMMITTEE

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| **RESPONSIBLE COMMITTEE** | CHANGE PANEL |

## 10 BUSINESS CASE ASSESSMENT

There is no additional cost or impact identified from this change, and this reflects the original policy intention of the Switching Programme in designating REC v2.0.

Market Participants and Service Providers have already implemented the Change Proposals that are missing from the REC drafting, when they were implemented in previous codes. The correction of these omissions, and other typographical errors, will ensure that the REC reflects the current market arrangements and remove the risk of new Market Participants interpreting their requirements incorrectly.

As there is no cost associated with this Change Proposal, and it will improve the accuracy and clarity of the REC, we are satisfied that a positive business case exists for correcting this and implementing this Change Proposal.

## 11 CASE FOR CHANGE

The Code Manager considers that there is a positive case for change to implement this Change Proposal, on the basis that:

- The proposed solution is fully formed and appropriately resolves the problem statement.
- There are no identified additional costs to the market in implementing the proposed solution.
- The impact of not implementing this solution would cause detriment to Market Participants, as the REC would not reflect the current market arrangements and could result in new Market Participants interpreting processes differently to existing Market Participants.
- A positive business case can be made, as detailed in section 10 of this report.

## 12 CODE MANAGER'S RECOMMENDATION

Based on the evidence in sections 10 and 11 of this report, the Code Manager considers a positive business case can be made for implementing this solution and recommends that the Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 24 February 2022.

## 13 CONSULTATION PLAN AND NEXT STEPS

The consultation on this Preliminary Change Report for R0012 will be published on the REC Portal on **03 November 2021** and will close on **24 November 2021**.

Following consultation, the Code Manager will produce an updated version of this Preliminary Change Report (referred to as the Final Change Report). This will include the outcome of the

consultation, setting out a summary of the consultation submissions and the Code Manager's response.

The Final Change Report will be issued to the Change Panel to make its determination.

## 14 APPENDIX

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|---|---|
| **CHANGE PROPOSAL** | Change Proposal Page |
| **LEGAL DRAFTING** | Change Set (Clean) |