RETAIL ENERGY CODE

This document is classified as **WHITE**.
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01	Initial Assessment Report
02	Preliminary Change Report
03	Final Change Report

INITIAL ASSESSMENT REPORT

R0014 – CABLE COLOUR IDENTIFICATION

DOCUMENT VERSION	1.0
DATE ISSUED	26/11/2021
DOCUMENT APPROVAL STATUS	APPROVED BY REC CHANGE PANEL
RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

CHANGE OVERVIEW

This change seeks to introduce an exception labelling process for when there are shortages of appropriately coloured cables.

	High Impact: N/A
	Medium Impact: Metering Equipment Managers, Distribution Network Operators
	Low Impact: Metering Scheme Auditors

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1 SUMMARY

During times of supply chain shortages, it is not always possible to source cables with the correct outer sheath colour, as required by the Electricity Meter Operations Code of Practice (MOCoP). Where there is a sustained period of supply shortage, an alternative approach needs to be adopted.

Appendix 9 of the REC Electricity Meter Operation Code of Practice (MOCoP) sets out the obligations for the use of cables with different out sheath colours from the inner insulation. This legal text does not currently reference the need to label the alternative cables.

The Institution of Engineering and Technology (IET) Wiring Regulations provide an alpha-numeric code to be used which corresponds to the cable colours. This code is set out in Table 51.1 of the IET Wiring Regulations – BS7671:2018, Section 514.

This Change Proposal seeks to update Appendix 9 of the REC MOCoP to include the labelling of cables, in accordance with IET Wiring Regulations, where an alternative out sheath colour has been used.

This will provide clarity to MEMs and DNOs of their obligations in these circumstances and ensure that Metering Scheme Auditors are clear about permissible alternative solutions.

2 PROBLEM STATEMENT

During times of sustained supply chain shortages, some colour coded cables may not generally be available. Where this is the case, Metering Equipment Managers (MEMs) and Distribution Network Operators (DNOs) need to be able to source a suitable alternative cable so that they can continue to install and maintain meters. Although the labelling of cables with different out sheath colours from the inner insulation is covered by the IET Wiring Regulations, this is not set out within the REC Electricity MOCoP.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As an electricity Consumer, I want requested meter work to take place safely and efficiently at the time and date agreed, so that I have a safe and working meter.
MARKET PARTICIPANT USER STORIES	
M1	As a MEM or a DNO I want clarity on how to deal with cable labelling during periods of coloured cable supply chain shortages, so that I can continue to install or maintain consumer metering.
M2	As a Metering Scheme Auditor, I want there to be clarity on the permitted labelling of non-standard colour coded cables used when connecting meters, so that audits can be appropriately completed.

4 IMPACTS

REC PARTIES AND SERVICE USERS
Metering Equipment Managers
Distribution Network Operators

REC SERVICE PROVIDERS
Metering Scheme Auditors

CONSUMERS
Electricity Consumers

REC DOCUMENTS / PRODUCTS
Electricity Meter Operations Code of Practice

The impacts identified are based on the proposed solution, to update Appendix 9 of the Electricity MOCoP.

During an initial review of Appendix 9, a number of potential 'housekeeping' changes were identified. For these to be considered for progression alongside the changes associated with this Change Proposal, the 'housekeeping' changes would need to be non-material, with no impact to obligations or Market Participants. The materiality of any proposed 'housekeeping' changes would be validated through the consultation.

4.1 CROSS CODE IMPACTS

There are no cross-code impacts identified. The Distribution Connection and Use of System Agreement (DCUSA) requires the MEMs and DNOs to comply with the MOCoP generally, but have no specific requirements related to the proposed solution.

5 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	SELF-GOVERNANCE
RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

As per the REC Baseline Statement, the MOCoP is a Category 2 document and change control for that document is the responsibility of the REC Metering Expert Panel (MEP). As this change comes under the responsibility of the MEP, and since the change is not complex nor affecting any other change currently being developed, it is appropriate for the MEP to be the Responsible Committee.

6 PRIORITY STATUS AND URGENCY

PRIORITY STATUS	LOW
URGENCY	STANDARD

The Priority Status for this Change Proposal is 'Low' based on a 'Weighted Significance' score of '1' and an 'Urgency' score of 0. This is broken down as below:

Significance:

Legal & Regulatory Compliance – A Score of 1 to reflect that this change proposal will address the misalignment of the MOCoP with the IET Wiring Regulations.

Strategic Direction – a score of 0 because this change does not support the implementation of the REC Strategy and Strategic Objectives

Cost Benefits/Value – A score of 0 as there are no direct financial benefits identified for Consumers, REC Parties or RECCo.

Consumer Impacts – A score of 1 to reflect the improvement to Consumer experience that would be seen through the implementation of the solution. Without a change to the MOCoP to include an alpha-numeric label for substitute coloured cables, MEMs might delay connecting meters when colour coded cables are in short supply.

Operational efficiencies – A score of 1 to reflect that MEMs and DNOs will have an alternative solution to address supply chain shortage of appropriately covered cables. It will also give clarity to Metering Scheme Auditors on what they can expect to see in respect of the labelling where a substitute cable colour is being used, lessening the risk of non-compliance's being raised on site audits.

Urgency:

This change is not deemed to be Urgent, as the change reflects changes previously approved to the IET Wiring Regulations but not translated into the MOCoP Operational Document. There is no urgent requirement for the Change Proposal to be progressed against a specific timeline.

There are no other changes or activities dependent on the progression of the change, however, it would be prudent to update the MOCoP as soon as reasonably practicable to ensure that the audit arrangements for MEMs and DNOs aligns the MOCoP with the relevant IET Wiring Regulations.

Effort:

The Effort is deemed to be minimal as the solution is proposed as a document change with no system impacts.

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PRIORITISATION MATRIX

Significance	Score	Weighting
Legal/Regulatory Compliance	1	30
Strategic Direction	0	20
Cost Benefits / Value	0	10
Consumer Impacts	1	30
Operational Efficiency	1	10

Urgency

3	N/A	13	23	33
2	02	12	22	32
1	01	11	21	31
0	00	10	20	N/A

Significance

Weighted Significance Score	1
Urgency	0
Overall Priority Score	**10**

Effort	0 - Minimal

Priority Score	Priority Status
23 - 33	Critical
13 - 22	High
11 - 21	Medium
00 - 10	Low

PRIORITY STATUS
Low

7 SUMMARY OF CHANGE PROPOSAL PLAN

The proposed solution is to update Appendix 9 of the Electricity MOCoP, to provide clarity on what labelling should be used when there are supply chain shortages of the standard cable colours. It is assumed that this is a document only change to the MOCoP as the IET Wiring Regulations BS7671:2018 are already binding on those undertaking electrical installations.

As there is no alternative solution open to MEMs and DNOs, that will meet the IET Wiring Regulation requirements, the change will move to Preliminary Assessment without the need for solution development or Impact Assessment activity.

	FROM	TO
PRELIMINARY CHANGE REPORT ISSUED	04/01/2022	04/01/2022
PRELIMINARY CHANGE REPORT APPROVAL	12/01/2022	12/01/2022
CONSULTATION	17/01/2022	07/02/2022
FINAL CHANGE REPORT ISSUED	25/02/2022	25/02/2022
RESPONSIBLE COMMITTEE DECISION	09/03/2022	09/03/2022
APPEAL WINDOW CLOSURE	28/03/2022	28/03/2022

8 GLOSSARY

TERM	DEFINITION
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Distribution Code Use of System Agreement (DCUSA)	means the agreement of that name maintained pursuant to the Electricity Distribution Licences.
Institute of Engineering and Technology (IET) Wiring Regulations	The Institute of Engineering and Technology Wiring Regulations
IET BS7671:2018	The British Standards Institution co-publish with the IET the Requirements for Electrical Installations under BS7671
Meter Operation Code of Practice (MOCoP)	REC Operational Document: Electricity Meter Operator Code of Practice
Metering Equipment Manager (MEM)	means, as applicable, either: (a) for electricity, the Meter Operator Agent (as defined in the BSC) Appointed by an Electricity Supplier; or (b) for gas, the Meter Asset Manager (as defined in the UNC) Appointed by the Gas Supplier.
Metering Expert Panel (MEP)	means, a group of that name established and constituted from time to time pursuant to and in accordance with the Retail Energy Code or any subsidiary document of the Retail Energy Code.