RETAIL ENERGY CODE

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CHANGE PROPOSAL PLAN

R0015 – REMOTE COMMUNICATION OBLIGATIONS FOR ELECTRICITY ADVANCED METERS

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DOCUMENT APPROVAL STATUS	APPROVED BY REC CHANGE PANEL

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RESPONSIBLE COMMITTEE	CHANGE PANEL

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CHANGE OVERVIEW

This Proposal seeks to introduce an explicit obligation under the REC regarding the provision of active remote communications for electricity Advanced Meters. This supports an effective transition for the Advanced Meter segment, ahead of the Market-wide Half Hourly Settlement (MHHS) Programme migration deadlines.

KEY MILESTONES

	FROM	TO
SOLUTION ANALYSIS AND DEVELOPMENT	04/01/2022	27/02/2022
PARTY IMPACT ASSESSMENT	28/02/2022	21/03/2022
SERVICE PROVIDER IMPACT ASSESSMENT	07/04/2022	03/05/2022
PRELIMINARY CHANGE REPORT ISSUED	27/05/2022	27/05/2022
CONSULTATION ISSUED	10/06/2022	10/06/2022
FINAL CHANGE REPORT ISSUED	29/07/2022	29/07/2022
RESPONSIBLE COMMITTEE DECISION	10/08/2022	10/08/2022

APPEAL WINDOW CLOSURE	26/08/2022	26/08/2022
SOLUTION REFINEMENT AND STAKEHOLDER ENGAGEMENT	12/12/2022	13/01/2023
CONSULTATION ISSUED	20/01/2023	03/02/2023
UPDATE PROVIDED TO PANEL	07/02/2023	07/02/2023
FINAL CHANGE REPORT ISSUED	14/02/2023	14/02/2023
RESPONSIBLE COMMITTEE DECISION	21/02/2023	21/02/2023
AUTHORITY DETERMINATION REQUESTED	28/02/2023	28/02/2023

1 RE-BASELINE ACTIVITY

This Change Proposal Plan has been re-baselined following review at the REC Change Panel on 20 December 2022.

Following the rejection of R0015 at the Metering Expert Panel meeting on 10 August 2022, the Code Manager referred the Change Proposal to the Authority for decision. On 01 December 2022, Ofgem published the Decision to Send Back Modification R0015 'Remote communication obligations for electricity Advanced Meters' | Ofgem.

As directed by Ofgem, the Responsible Committee has been changed to the Change Panel and the Change Proposal will follow an Authority determination change path. This plan sets out a timetable that ensures an evidenced proposal and recommendation can be sent back to the Authority by 28 February 2023.

The dates to be added to the plan are detailed here:

	FROM	TO
SOLUTION REFINEMENT AND STAKEHOLDER ENGAGEMENT	12/12/2022	13/01/2023
CONSULTATION ISSUED	20/01/2023	03/02/2023
UPDATE PROVIDED TO PANEL	07/02/2023	07/02/2023
FINAL CHANGE REPORT ISSUED	14/02/2023	14/02/2023
RESPONSIBLE COMMITTEE DECISION	21/02/2023	21/02/2023
AUTHORITY DETERMINATION REQUESTED	28/02/2023	28/02/2023

A new section has been added to this document to detail the additional activities that are required following the send back:

- 3.4 Required activities and stakeholder engagement following Authority send back

No updates have been made to the existing sections detailing the plan to date.

2 SCOPE

2.1 IN SCOPE

This document details the plan for analysis, solution development, assessment, and the consultation for this Change Proposal.

2.2 OUT OF SCOPE

This plan does not consider any of the required activities by the Balancing and Settlement Code (BSC) covered through P432 (Half Hourly Settlement for CT Advanced Metering Systems).

3 PROJECT STRUCTURE AND ORGANISATION

3.1 POINTS OF CONTACT

LEAD ANALYST	Harriet Truss	EMAIL	02039348744
TECHNICAL LEAD	Michael Taylor	EMAIL	07824072981

3.2 REQUIRED ACTIVITIES

3.2.1 ANALYSIS AND SOLUTION DEVELOPMENT

The solution for this Change Proposal has not been fully defined, therefore a period of solution analysis and development will be required. During this phase, the Code Manager will look to develop solution options that deliver the right obligations against stakeholders, the Code Manager will seek informal views on these from wider industry Subject Matter Experts.

Engagement with the Market-wide Half Hourly Settlement Programme working groups and P432 workgroup will be maintained throughout the analysis and solution development phase.

Following the solution development activity, the Code Manager will review the Change Proposal Plan to confirm the planned activity and timelines remain appropriate for the proposed solution.

The output of this phase of activity will be the draft legal text, developed within input and review from REC Legal Advisers

3.2.2 IMPACT ASSESSMENT

A number of REC Parties have been identified as impacted by this change, therefore, a Party Impact Assessment (Party IA) is needed to understand the consequences and any costs and/or benefits that may result from the implementation of this Change Proposal.

Balancing and Settlement Code (BSC) stakeholders (such as Data Collectors), may also be impacted. Therefore, the Impact Assessment will be shared with Elexon and open to non-REC Parties to allow for any relevant responses from these parties to be considered.

The impact assessment period for this change has been aligned with the impact assessment period for P432.

The plan allows for a Code Manager SPIA, which will include consideration by the PAB to assess the risk of the proposed new obligation and advise on the appropriate assurance activity and the associated timings.

We suggest that a standard 15 Working Day SPIA follows the Party IA so that Party responses can inform any refinement of the proposed solution before the SPIA and the subsequent risk assessment.

3.2.3 PRELIMINARY ASSESSMENT

A Preliminary Assessment will be carried out following the Impact Assessment, this will consider Impact Assessment responses and the case for change to develop the Code Manager's recommendation.

3.2.4 FINAL ASSESSMENT

A Final Assessment will be carried out to review consultation responses and assess impacts affecting the Final Change Report and Code Manager's recommendation, prior to publishing the Final Change Report for decision.

The decision for P432 is expected in June following the Final Modification Report being sent to the Authority for determination on 18 May 2022. This will ensure the outcome of P432 will be understood prior to the Code Manager's recommendation being finalised and the Change Proposal presented for decision.

3.3 STAKEHOLDER ENGAGEMENT PLAN

3.3.1 IMPACT ASSESSMENT PLAN

For this Change Proposal, REC Party IAs are required to allow any proposed solution to be appropriately assessed. The Impact Assessment will be shared with Elexon and open to non-REC Parties to allow for any relevant responses from these parties to be considered.

In the Party IA, we wish to identify the effort involved by impacted stakeholders in using provision of remote communications for Advanced meter sites.

An SPIA will be sought from the Code Manager to identify the retail risk and recommended assurance measures and their associated impacts on the Code Manager.

3.3.2 CONSULTATION PLAN

At this stage we expect that a standard 15 Working Day period for industry consultation will be sufficient. This will be validated once the solution has been assessed and developed.

The consultation period is not directly aligned with the consultation period for P432 (19 April 2022 to 03 May 2022), the consultation for P432 will have been concluded ahead of the REC consultation, this will enable output from the P432 consultation to shape the questions and consultation approach.

3.3.3 CROSS CODE ENGAGEMENT

BSC Modification P432 has been raised to take forward the CCDG recommendations on HH Settlement ahead of MHHS migration deadlines.

Although the REC and BSC changes are independent, they are complimentary. Therefore, there will be a need for ongoing engagement and alignment of activity through the development and progression of the REC Change Proposal.

To this end the impact assessment periods will be aligned across the REC and BSC changes, with the REC consultation taking place after the consultation on P432 has closed.

The REC Change Lead will engage with the Elexon lead for P432, to ensure activity and plans remain aligned.

3.3.4 ENGAGEMENT WITH REC COMMITTEES / SUB-COMMITTEES

The REC Metering Expert Panel (RECMEP) is proposed as the Responsible Committee. Through the analysis and solution development phase we propose engagement with the

RECMEP for validation of certain output and assumptions. This may include seeking informal views on the proposed solution or solution options.

Depending on timelines this may be direct engagement via the RECMEP meetings or via the REC Portal.

3.4 REQUIRED ACTIVITIES AND STAKEHOLDER ENGAGEMENT FOLLOWING AUTHORITY SEND BACK

Following the Authority's decision to send back R0015, a short period of solution refinement has been provided for. This activity will focus on the timescales for implementation including the effective from dates of the obligation.

The Code Manager will engage with stakeholders, and is considering these channel options:

- direct engagement with those who responded to the impact assessment and consultation
- ad hoc virtual event to present and gather feedback on the Code Manager's proposal
- existing industry metering forums such as the Electricity Metering Operational Forum and the Association of Meter Operators – due to the time available the Code Manager will target engagement outside of the standard meeting cycles.

A 10 Working Day consultation period is proposed, before a revised Final Change Report is developed and presented to the Change Panel to gain a recommendation to pass to the Authority.

3.5 RAID

3.5.1 RISKS AND ISSUES

No risks or issue have been identified that would impact the progression of the Change Proposal

3.5.2 ASSUMPTIONS AND DEPENDENCIES

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A1	Elexon will share the REC impact assessment and consultation with BSC Parties.	To enable input from all impacted parties, the impact assessment and consultations will be shared with Elexon for	Closed – the Code Manager engaged with Elexon throughout impact assessment, consultation and final assessment.

		onward sharing with BSC Parties.	

No.	DEPENDENCY	NOTES	STATUS
D1	Inclusion on agenda for April 2022 meeting of the PAB	In plan	Closed - Performance Assurance assessment completed outside of PAB

3.6 DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS

SUBMISSION DEADLINE	27/05/2022