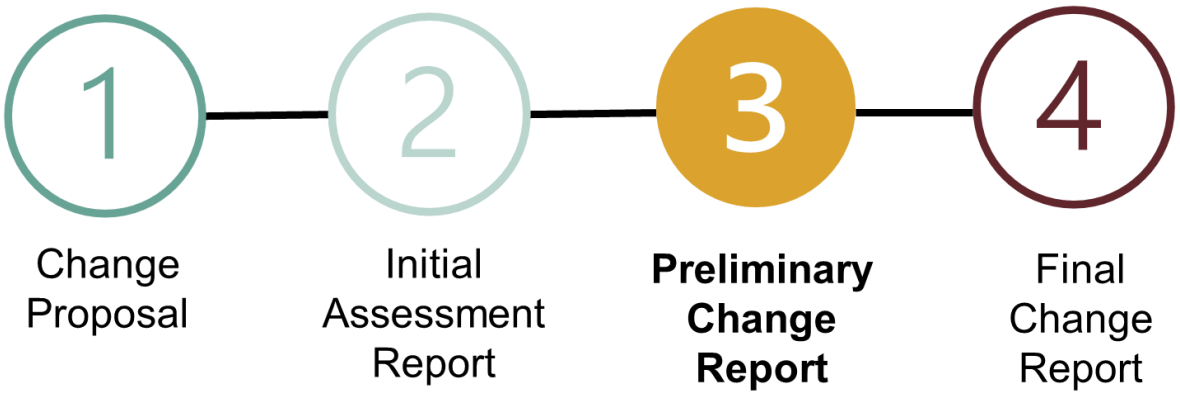
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PRELIMINARY CHANGE REPORT



PURPOSE:	The Preliminary Change Report is drafted by the Code Manager when a Change Proposal has a fully formed solution that has been sufficiently assessed to allow a decision to be made on whether this should be approved for implementation. The report includes a summary of the Change Proposal, details of the proposed solution and the Code Manager's view on the case for change and recommendation.
NOTES:	The report sets out the minded-to position, prior to formal consultation, and may be changed when publishing the Final Change Report.
NEXT STEPS:	The Preliminary Change Report will be issued for consultation. Following this, the Code Manager will produce a Final Change Report and the Responsible Committee will make a decision on whether to approve the Change Proposal.

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

PRELIMINARY CHANGE REPORT

R0015 – REMOTE COMMUNICATION OBLIGATIONS FOR ELECTRICITY ADVANCED METERS

DOCUMENT VERSION	2.0
DATE ISSUED	10/06/2022
DOCUMENT APPROVAL STATUS	APPROVED BY RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

LEAD ANALYST	Harriet Truss	EMAIL
TECHNICAL LEAD	Michael Taylor	EMAIL
ASSURANCE LEAD	Eliana Campbell	EMAIL

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.

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0015 is **APPROVED** for implementation on 04 November 2022.

	High Impact: Metering Equipment Managers
	Medium Impact: N/A
	Low Impact: Energy Suppliers, Half Hourly Data Collectors

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BACKGROUND

1 SUMMARY

The Code Change and Development Group (CCDG) is one of three industry working groups supporting Ofgem's Significant Code Review on Electricity Settlement Reform.

The CCDG identified that a key enabler of an effective transition to Market-wide Half Hourly Settlement for the Advanced segment, will be to set explicit Half Hourly (HH) Settlement and remote communications obligations for Current Transformer (CT) and Whole Current (WC) Advanced Meters ahead of the migration to Market-wide Half Hourly Settlement.

The CCDG worked up recommendations to ensure a smooth and efficient transition to MHHS. The industry were consulted on the recommendations and the outcome determined that the following recommendation be progressed in respect of electricity Advanced Meters (Recommendation 3 within their 'CCDG Recommendations on the Transition to Market-wide Half-Hourly Settlement'):

- For CT Advanced Meters settling Non-Half Hourly (NHH), a period of mandatory Change of Measurement Class (CoMC) activity running from October 2022 to October 2023;
- Where possible, Whole Current (WC) Advanced Meters settling NHH are moved to settle HH via CoMC by October 2024. This will simplify the migration process but should not be mandated; and
- For all Advanced Meters (CT and WC) settling NHH, the mandatory CoMC activity should be supported by an obligation to ensure that remote communications are fitted and working, for CT Metered MPANs by October 2023, and for all Advanced Meters by October 2024.

This Change Proposal seeks to introduce an explicit obligation under the Retail Energy Code (REC), regarding the requirement to have active remote communications for Advanced Meters. The Proposer put forward an implementation date of March 2023 for CT Advanced Meters and for all Advanced Meters by October 2024. This would see active remote communications in place ahead of the CoMC activities.

Currently, neither the Balancing and Settlement Code (BSC) nor the REC explicitly states that the provision of remote communications to any Supplier Volume Allocation (SVA) Metering Systems should include a requirement that they are maintained and working.

2 PROBLEM STATEMENT

The Balancing and Settlement Code is seeking to mandate the Half-Hourly Settlement of electricity Advanced Meters ahead of the transition to Market-wide Half Hourly Settlement. In order to support this transition, these meters will need to support remote communications to allow half hourly consumption data to be collected. There is currently no explicit requirement for Energy Suppliers and/or Metering Equipment Managers to ensure these meters have working remote communications, which could impact the successful migration of these meters to the new arrangements.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As an electricity Consumer with an Advanced Meter, I want my usage data to be accessed remotely from my meter, to reduce the need for on-site visits and ensure that I receive timely and accurate bills.
MARKET PARTICIPANT USER STORIES	
M1	As the Market-wide Half Hourly Settlement (MHHS) Programme I want to see an effective, early migration of NHH settled Advanced Meters to HH settled, to reduce the risk of missed migration deadlines and ensuring sufficient time to resolve 'problem' sites ahead of the MHHS migration deadline.
M2	As an Energy Supplier I want to obtain usage data remotely, reducing the need for on-site metering reading activity, enabling me to settle and bill accurately.
M3	As a Metering Equipment Manager (MEM), I need to understand any changes to obligations that may impact my business, so I can engage in the change process and plan any required changes to my systems, processes, and organisation.

PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

The CCDG undertook analysis to gain a clear understanding of the most effective way to ensure MHHS readiness in the Advanced Meter population. The CCDG recommendations were consulted on as part of their activity.[1] No changes were made to the recommendations as a result of the responses which were generally supportive of Recommendation 3. Consultation responses suggested that any obligation relating to remote communications should allow for the sites where they are not possible. The remote communications element of the recommendation was supported in principle with no other specific concerns raised.

The solution for this Change Proposal was not fully defined when it was raised, therefore the Code Manager completed further analysis activity to inform the proposed solution. The Code Manager engaged with the Proposer (the Association of Meter Operators), industry Subject Matter Experts who were involved in the CCDG, RECCo and the MHHS Programme to work through the scenarios and potential options for clarity to be provided in the REC on what is expected in regard to remote communications requirements.

This analysis determined that a new REC obligation would be best placed on the MEMs as the REC Party responsible for the installation and maintenance of Communications Equipment.

[1] 'CCDG Recommendations on the Transition to Market-wide Half-Hourly Settlement'

Furthermore, the obligation should be high-level, to avoid being prescriptive in how the obligation should be met.

Consideration was given to whether it was appropriate to set the obligation for all Advanced Meters, rather than CT meters only. The conclusion of the analysis was that an obligation for all Advanced Meters is appropriate to support:

- the overarching energy market shift to remote access to consumption data;
- the ongoing success of Half Hourly settlement; as well as,
- enabling the identification of blockers to migration under the MHHS Programme so that the industry has more time to resolve 'problem' sites where issues could delay migration completion.

Analysis also identified potential solution requirements for reporting and for amendments to the Change of Agent (CoA) process steps to ensure the successful transfer of remote communications access.

5 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

5.1 REC PARTY IMPACT ASSESSMENTS

A REC Party Impact Assessment, targeting Electricity Suppliers, Electricity MEMs and Half Hourly Data Collectors (HHDCs) was published on the 28 February 2022:

- Five responses were received representing views from MEMs and Suppliers
- Two responses were confidential in their entirety, and one had confidential elements

The confidential responses will not be published however, these have been considered in the Code Manager assessment.

The non-confidential responses have been consolidated and can be found on Change Proposal Page on the REC Portal here.

METERING EQUIPMENT MANAGERS	• Pushed back on an absolute obligation, given the known industry scenarios where remote communications cannot be in place • Agreed in principle on the requirement for reporting and agreed the data items proposed were reasonable. More detail was required on the solution in respect of reporting for it to be fully assessed • Supported the intent to introduce clarity in the process steps regarding CoA responsibilities but that this needs to be worked through in detail to get the right solution • Minimal costs were indicated in relation to reporting with more significant costs associated with any solution for the CoA process. No exact figures were provided

	• Lead times of between 3 and 6 months were indicated in relation to reporting and clarification of the CoA responsibilities • No Benefits were identified
ENERGY SUPPLIERS	• More details were required on the solution for reporting to fully assess • Supported the intent for clarifications to the CoA responsibilities to minimise disruption to communications and therefore access to consumption data • No tangible costs were identified • Benefits to settlement and billing were identified • Analysis to understand portfolio status on active communications would be needed. This would help determine lead time requirements where there are unreasonable gaps in working communications

5.2 SERVICE PROVIDER IMPACT ASSESSMENTS

A Service Provider Impact Assessment (SPIA) was sought from the Code Manager. The aim was to assess if the obligation would be associated to any Retail Risks and determine any required Performance Assurance activity for the new obligation. The REC Performance Assurance Service Provider assessed the proposed new obligation. They advised on whether the introduction of any new Performance Assurance activity would be appropriate and any associated timings. As part of the SPIA, the BSC PAB representative was also engaged for their views.

CODE MANAGER – REC PERFORMANCE ASSURANCE	• Supported the intention of the change • Did not agree with the term 'all reasonable steps' to be used to avoid areas in the code that are unclear and where guidance is not provided on how to meet the obligation • Acknowledged there may be occasions where the obligation cannot be met, and this may be for legitimate reasons due to site-specific access issues • Advised that the new obligation relates to settlement risks and that no new Retail Risks arise from its introduction. Therefore, no changes to the existing Performance Assurance Framework (PAF) are recommended • No time constraints were identified • No tangible Costs or Benefits were identified

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6 DELIVERY AGAINST CHANGE PROPOSAL PLAN

	PLANNED	COMPLETED
SOLUTION ANALYSIS AND DEVELOPMENT COMPLETED	27/02/2022	27/02/2022
PARTY IMPACT ASSESSMENT ISSUED	28/02/2022	28/02/2022
SERVICE PROVIDER IMPACT ASSESSMENT ISSUED	07/04/2022	07/04/2022
DEADLINE FOR ALTERNATIVE CHANGE PROPOSAL SUBMISSION	27/05/2022	27/05/2022
PRELIMINARY CHANGE REPORT ISSUED	27/05/2022	27/05/2022

To date all activity has been completed within the planned timescales.

7 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

7.1 RISKS AND ISSUES

No.	RISK	NOTES	MITIGATION
R1	The business case is not supported by a full cost benefit analysis.	It has not been possible to include one in this report because the impact assessment responses from REC Parties did not provide a view of costs.	The Consultation will be used to explore impacts in more detail.

No.	ISSUE	NOTES	HOW TO PROGRESS
I1	There is a desire from industry to address an issue regarding closed, or private communication networks on a CoA through clarification in the process steps under the Metering Operations Schedule.	It is not appropriate to delay the implementation of the solution to address the R0015 problem statement to accommodate development of a solution for the specific CoA issue.	REC Issue, RI-0030, has been raised to assess the appropriate path to address this requirement.

7.2 ASSUMPTIONS AND DEPENDENCIES

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A1	Supply Licence Condition 12.19 intends that remote communications means working communications in order to remotely share consumption data.	The energy industry's move to smart and advanced metering has a reliance on communications that are capable of giving access to consumption data in order for the industry to function as intended.	Closed
A2	As of 01 January 2022, all Advanced Meters include remote Communications Equipment.	Standard Licence Condition 12.27: "After the ARS Specified Date, the licensee must not supply electricity to a Designated Premises or Domestic Premises through a Current Transformer Electricity Meter which is not also an advanced meter." ARS Specified Date means 30 June 2021 or such later date as may be specified in a direction issued by the Secretary of State.	Closed
A3	The obligation is required for all Advanced Meters, although the driver has come through requirements for NHH readiness for MHHS.	n/a	Closed
A4	The obligation applies regardless of commercial arrangements, type of advanced Metering Equipment on site (CT or WC) or the current level and method of data collection.	n/a	Closed
A5	The industry considers Communications Equipment to be part of the Metering Equipment –	REC Interpretations and Definitions Schedule.	Closed

	this includes for Advanced Meters.		
A6	From October 2024 working remote communications will be the expected default – therefore sharing data between MEMs to confirm remote communications status should not be required.	n/a	Closed
A7	BSC Modification P432, although supported by it, is independent to this Change Proposal.	P432 will set explicit Half Hourly (HH) Settlement obligations for Current Transformer (CT) Advanced Meters ahead of the migration to Market-wide Half-Hourly Settlement (MHHS).	Closed
A8	This change is driven by a recommendation by the MHHS programme, it is an enabler but is not a deliverable of the programme.		Closed
A9	The risks associated with the new obligation are to settlement and are not Retail Risks.		Validated in the SPIA response

No dependencies have been identified that would impact the progression of this Change Proposal.

8 PROPOSED SOLUTION

The solution proposed will introduce an obligation on the MEMs, as the REC Party directly responsible for the management of Metering Equipment, including Communications Equipment as set out in Paragraph 2.13 of the Metering Operations Schedule.

Existing obligations are set out under the Electricity Supply Licence Conditions for Advanced Meters to include Communications Equipment. The Code Manager considers that the licence condition expects that Communications Equipment is installed, and remote communications are active.

The licence conditions describe an Advanced Meter as an electricity meter that:

- provides measured electricity consumption data for multiple time periods, and is able to provide such data for at least half-hourly time periods; and

- is able to provide the licensee with remote access to such data.

Although indirectly, MEMs are responsible for this. The addition to the REC schedule will make the obligation more explicit that MEMs should ensure that the Communications Equipment is active and is therefore able to provide remote access to consumption data.

This supports the MHHS Target Operating Model[2] which assumes that Advanced Meter consumption data is accessed remotely. That the REC obligation is in advance of migration also supports the final CCDG recommendations:

> "The CCDG recommends that the supporting obligation on Meter Operator Agents (MOAs) to ensure that remote communications are fitted and working for all Advanced Meters is introduced earlier to ensure (subject to all reasonable steps) that this has time to be completed before Suppliers begin the CoMC process in April 2023"[3]

The obligation will be set out in the REC as a new paragraph within the Metering Operations Schedule. It will be at a level that does not define process detail for all scenarios of instalment, maintenance or change of MEM.

The solution has been proposed as an 'all reasonable steps' obligation. It has been deemed appropriate specifically for this obligation as it is recognised that complete compliance may not be possible due to site-specific circumstances. For example, MEMs cannot always be guaranteed access to all Metering Equipment, such as those located on Ministry of Defence sites.

Existing case law has provided guidance as to the key characteristics of the most commonly used endeavours clauses and how they sit on the spectrum of obligations.

'Best endeavours' have been judged by standards of reasonableness, requiring the contractor to take 'all reasonable steps' in their power which a prudent or determined person acting in their own interest and anxious to achieve what is required would have taken. This can include obliging the contractor to sacrifice their own commercial interest, but it does allow the contractor some regard for its own commercial interests. Mitigating factors are:

- It would not expect the contractor to take action resulting in the financial ruin of the company, or completely disregard the company's interests
- Equally, it would not expect a contractor to take a futile action – taking actions that have no chance of success[4,5]

Using terminology consistent with the REC, 'all reasonable steps' has been proposed as the next level of burden, where an absolute obligation is not achievable. This reflects industry feedback from both the CCDG consultation and the Party IA for this Change Proposal. 'All reasonable steps' sets the expectation that MEMs should take all reasonable courses of action to ensure active remote communications are established and maintained.

[2] MHHS Target Operating Model
[3] Page 10, 'CCDG Recommendations on the Transition to Market-wide Half-Hourly Settlement'
[4] Rhodia international Holdings Ltd v Huntsman International LLC [2007]
[5] CPC Group Ltd v Qatari Diar Real Estate Investment Company [2010]

It should be noted that this proposed solution does not put in place new assurance measures. The responsibility for how the obligation is met will sit with the MEM. Disruptions to communications are expected to be resolved under the existing fault resolution processes as set out in in the Metering Operations Schedule. It will be the responsibility of the appointed MEM to determine what 'all reasonable steps' means for each site.

By including 'all reasonable steps' in the Metering Operations Schedule it should be noted that it will only apply to the obligation created by this Change Proposal.

The inclusion of 'continuous' in the text requires MEMs to follow all reasonable courses of action to maintain remote communications, whether through fault resolution or through collaboration with other MEMs where communications are interrupted during a CoA.

The dates included in the obligation align to the recommendations by the CCDG. The date for CT meters has been set to the end of February 2023, to allow for all remote communications to be active ahead of the start of the mandatory CoMC period in April 2023 and therefore enable its completion by October 2023. Early identification of blockers and barriers to the success of MHHS and migration plans will enable the industry (MEMs, MHHS Programme and BSC) to address issues which could delay migration completion.

The draft legal text has been developed with input and oversight from REC Legal Advisers.

8.1 ALTERNATIVE SOLUTIONS

8.1.1 OBLIGATION

An absolute obligation was considered as the preferred starting point for any obligation but was not deemed appropriate. There are known site-specific circumstances that make the fulfilment of an absolute obligation impossible in this case. Non-compliance would only be considered permissible with a derogation. This would not be a reasonable expectation given the volume of sites and MEMs that would be impacted.

8.1.2 REPORTING/ASSURANCE

New reporting or assurance activity to monitor the new obligation was considered as part of the solution for this Change Proposal. The SPIA completed by the Code Manager to understand the impact to assurance plans, the Performance Assurance Framework and the Risk Register confirmed that the new obligation is associated with settlement risks and it does not create any new Retail Risks.

No additional assurance or reporting over and above what is already in existence for metering will be introduced by the REC Code Manager as part of this Change Proposal.

8.1.3 RESPONSIBILITIES ON CHANGE OF AGENT

During solution development, the Code Manager considered whether it was appropriate to include clarification on MEM responsibilities on a CoA, particularly to address an issue regarding closed, or private, communication networks.

It is understood that some Losing MEMs are not performing the necessary reconfiguration activities where communications are hosted on virtual private networks (VPNs). This results in the Gaining MEM being unable to connect to the meter and consumption data cannot be accessed. In this scenario the Gaining MEM must carry out a site visit to either replace the Communications Equipment, or the Meter, to resolve the issue. The Losing MEM in many circumstances can remotely reconfigure the Meter, ensuring that the communications provider can re-establish communications with the Gaining MEM and therefore connectivity is not disrupted.

In developing the solution, it was not considered appropriate to address this requirement in the high-level obligation in section 2 of the Schedule. The Party IA sought views instead on whether the process steps should be amended in the operational processes. These would clarify that Losing MEMs should reconfigure a Meter ahead of the CoA to ensure uninterrupted communications.

The impact assessment activity included engagement on this requirement with REC Parties, the Metering Expert Panel (MEP) and the BSC Issue 93[6] Remote Communications Workgroup and progression of a solution was considered appropriate. However, the timescales required to develop and define a solution with the right level of industry engagement cannot be accommodated within this Change Proposal's plan. The Code Manager considers that a delay to this Change Proposal is not appropriate as it will have a detrimental impact on the effectiveness of this change due to the short timescales. This obligation needs to be in place ahead of its effective from date for CT meters, for which mandatory migration is planned to start from April 2023.

The Code Manager has raised a new REC Issue, RI-0030, to assess how to take this requirement forward.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0015 can be found here.

10 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	04 November 2022

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

We propose this change is implemented in a standard REC release on the 04 November 2022, as the next available release following the targeted MEP decision date. This release would

[6] Issue 93 - Elexon BSC

ensure that the legal text is implemented with some lead time prior to the date by which the obligation itself must be met.

11 CHANGE PATH

CHANGE PATH	SELF-GOVERNANCE

12 RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

13 BUSINESS CASE ASSESSMENT

The benefits for this change are linked to a settlement risk, however Ofgem have estimated that the MHHS Programme will bring "net consumer benefits of between £1.6bn and £4.5bn over the period 2021-2045".[7]

CCDG made the recommendation that for all Advanced Meters (CT and WC) settling NHH, the CoMC activity should be supported by an obligation to ensure that remote communications are fitted and working, for CT Metered MPANs by October 2023, and for all Advanced Meters by October 2024.

This change to the REC puts that obligation on MEMs, as the responsible party for Communications Equipment, as part of the Metering Equipment. The obligation clarifies the expectation regarding remote communications and their importance as an active component of the Metering Equipment for Advanced Meters and the success of MHHS.

13.1 COSTS

No costs have been identified for the Code Manager or the REC Service Providers.

Unspecified costs have been identified for MEMs for the following:

- where they may look to amend contracts or processes to be able to ensure active remote communications in more circumstances;
- where reporting would need to be introduced (minimal cost); and
- where contracts or processes need to be updated to adhere to the clarified CoA responsibilities (indicated as the most significant cost).

Costs that have been identified during the Party IA because of this change are primarily tied to the provision of reporting and to the implementation of necessary changes associated with clarifications in the CoA process steps. These costs have not been included in the Business

[7] Ofgem Determination on R0003: Retail Energy Code (REC) R0003 Market-Wide Half-Hourly Settlement Implementation and Governance Arrangements.pdf

Case assessment in this Preliminary Change Report, as the proposed solution is to deliver the high-level obligation only.

The new REC obligation is intended to clarify the assumption of the licence condition obligation that the Communications Equipment is active and providing remote access to data. The expectation is that Suppliers have the appropriate contractual arrangements in place with their appointed MEMs to meet their licence condition obligations. The Code Manager considers that there are therefore no additional costs associated with the change to include the REC obligation, as they are covered under existing commitments relating to the provision of Communications Equipment.

13.2 BENEFITS

No tangible benefits have been identified for this Change Proposal. This Change Proposal is being progressed independently to the MHHS Programme and will not necessarily drive a benefits case sufficient to justify this specific change. However, as an enabling change this will contribute to the achievement of the identified net consumer benefits of the MHHS Programme, as detailed above.

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
MHHS PROGRAMME READINESS	An effective, early migration of NHH settled Advanced Meters to HH settled, to reduce the risk of missed migration deadlines and ensuring sufficient time to resolve 'problem' sites ahead of the MHHS migration deadline
BILLING BENEFITS	It is assumed there will be benefits to Consumer billing where the increased occurrence of active remote communications directly enables the efficient and timely retrieval of accurate granular consumption data

The benefits that the proposed solution will provide therefore outweigh the costs.

14 CASE FOR CHANGE

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

- the proposed solution is fully formed and appropriately resolves the problem statement;
- the proposed solution through its support for the implementation of MHHS will help to achieve delivery of positive outcomes because of that programme; and
- a positive business case can be made, as set out in section 13 of this report.

15 CODE MANAGER'S RECOMMENDATION

Based on the evidence in sections 13 and 14 of this report, the Code Manager considers a positive business case can be made for implementing this solution and recommends that the Metering Expert Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 04 November 2022

16 CONSULTATION PLAN AND NEXT STEPS

The consultation on this Preliminary Change Report for R0015 will be published on the REC Portal on **10 June 2022**. Consultation will close on **01 July 2022.**

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 MEP to make its determination.

17 APPENDIX

CHANGE PROPOSAL	R0015 - Change Proposal Page
LEGAL DRAFTING	Link to EMAR
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	R0015 - Consolidated Impact Assessment Responses
RELATED CHANGE(S)	BSC Modification P432
ANY OTHER DOCUMENTS / LINKS	'CCDG Recommendations on the Transition to Market-wide Half-Hourly Settlement'