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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0015 – REMOTE COMMUNICATION OBLIGATIONS FOR ELECTRICITY ADVANCED METERS

On 20 January 2023 the Code Manager issued a consultation to industry to seek feedback on the Send Back Preliminary Change Report for R0015.

The purpose of this document is to consolidate the responses as well as answer any questions raised within those responses.

DOCUMENT VERSION	1.0
RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	14/02/2023
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Harriet Truss

DATE CONSULTATION ISSUED	20/01/2023
RESPONSE DEADLINE	03/02/2023

Question 1:	Do you agree that there is no longer a need to have a separate obligation date for Current Transformer and Whole Current Advanced Meters? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Siemens (Metering Equipment Manager)	Agree	-
IMServ Europe Ltd (Data Collector)	Agreed	-
Scottish Power (MEM)	Yes, we agree with the one obligation date.	-
British Gas (Energy Supplier)	Yes	-
OVO/IHTL (Energy Supplier and MEM)	OVO stands by its original determination that R0015 should be rejected. P432 only applies to CT meters - OVO would be open to a R0015 solution that aligns P432 in this regard. OVO does not believe that there needs to be a separate obligation date, and that, if this modification must be made, the date should align with P432 (M14). Ultimately, whilst we do not support the introduction of obligations under R0015, if a change must be made dates associated with such an obligation should be led by MHHS Programme rather than by REC.	Although R0015 will support P432 and previously had an obligation effective date driven by the earlier migration of CT meters, the obligation is driven by a wider requirement for remote communications across all Advanced Meters which supports the MHHS programme in the medium term and the licence conditions on an enduring basis. See Final Change Report v1.0, section 4. The key driver for the timing of the obligation effective date is to de-risk MHHS migration of

		Advanced Meters and to do so by removing as many barriers as possible ahead of migration starting. The Code Manager requested further evidence that supports the resolution of remote communications alongside migration as opposed to in advance of. This is addressed in the Send Back Final Change Report.

Question 2:	Do you agree that there is benefit in the obligation taking effect ahead of migrations, as recommended by the Code Change and Development Group (CCDG)? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Siemens (Metering Equipment Manager)	Yes, this will de-risk MHHS.	-
IMServ Europe Ltd (Data Collector)	Agreed	-
Scottish Power (MEM)	Yes.	-

British Gas (Energy Supplier)	We believe the obligation should take into consideration Market Wide Half Hourly programme miles stones instead of the fixed timescale that has been proposed.	The Code Manager requested further evidence that supports tying the obligation effective date to the MHHS milestone. Code Manager comments are provided against Question 5.
OVO/IHTL (Energy Supplier and MEM)	No, OVO agrees that the early application of an obligation on parties under R0015 would place an additional and unnecessary burden on teams. It would benefit a few parties, but would, on the whole, be detrimental: adding additional cost and requiring additional resources.	The Code Manager stands by the previous position that it recognises there will be operational costs associated with meeting the obligation, however, the Code Manager believes that the costs should already be reasonably expected to be incurred as part of the standard metering provision. The Code Manager requested further evidence that supports tying the obligation effective date to the end of MHHS migration. However, the additional information has not demonstrated that there will be additional cost or volumes to address as a result of the obligation date being set earlier.

Question 3:	For Metering Equipment Managers: Within your portfolio, how many of the Advanced Meters you are responsible for do not currently have active communications? Where possible please provide volumes of sites 'to be resolved' and volume of sites that are known 'No Communications'.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
	One respondent provided volumes.	The Code Manager thanks the respondent for providing the volumes and believes they reflect expectations. However, responses overall have provided the Code Manager with a very limited view of volumes.

Question 4:	Does the proposed obligation date of 01 April 2025 provide the required lead time for your organisation to carry out the necessary activities to meet the obligation, within all reasonability? If not, please explain why, and what lead time you do require.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Siemens (Metering Equipment Manager)	Yes, 01/04/25 provides sufficient lead time. However we feel that the obligation date should be tied to the MHHS milestone M11 and should move if M11 moves.	The Code Manager requested further evidence that supports tying the obligation effective date to the MHHS milestone.

		Code Manager comments are provided against Question 5.
IMServ Europe Ltd (Data Collector)	Yes	-
Scottish Power (MEM)	Yes. However we would expect this date to remain aligned to the MHHS programme milestones if these are changes as part of the current re-plan.	The Code Manager requested further evidence that supports tying the obligation effective date to the MHHS milestone. Code Manager comments are provided against Question 5.
British Gas (Energy Supplier)	We strongly believe that the obligation should be tied to M11 as it may need significant investment and mobilisation effort to achieve the milestones by MEM parties In order to meet the proposed timescales consideration will need to be given to the following: 1) Potential metering contract changes and the potential for MEMS to balance resources across all of their clients 2) Incoming suppliers have no way of knowing whether sites they acquire are communicating or not – and it is unclear what the obligation is on newly acquired sites 3) SOLR activity limits the ability to maintain comms in certain situations 4) Known access and meter issues that are widespread and have been known and around for a number of years and cannot be easily resolved (sensitive sites for example) 5) Meters may be communicating but the signal may not be strong enough for HH comms	The Code Manager acknowledges that time and effort will be required to address issues affecting communications. In preparation for the new obligation, it will be for MEMs, working collaboratively with Suppliers and DCs, to ensure they are progressing the steps they deem reasonable and appropriate to rectify gaps in meeting the obligation. The obligation will be on the currently Appointed MEM, therefore, they will need to determine the status of communications for any site they acquire and take all reasonable steps necessary to ensure communications equipment is active and maintained. If Communications Equipment is not present, the meter will not be meeting the definition of an Advanced Meter under the licence

		condition and MEMs and Suppliers should work together to resolve these sites. Code Manager comments on tying the obligation effective date to an MHHS milestone are provided against Question 5.
OVO/IHTL (Energy Supplier and MEM)	No, OVO does not agree that the proposed obligation date of 01 April 2025 provides the required lead time to carry out the necessary activities to meet the obligation, within all reasonability. OVO agrees that the timeline for the application of obligations under MHHS should be led by the MHHS Programme only, and, if necessary, aligned with P432.	The driver for the R0015 obligation effective date is to de-risk the programme as well as provide enduring clarity and support to the licence condition. The obligation effective date being set for the end of migration would not drive the benefits intended by the timing of the change.

Question 5:	Do you agree with the proposed legal text? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Siemens (Metering Equipment Manager)	As mentioned in question 4, we feel the obligation date should be tied to M11. Aside from the date, we agree with the legal text.	The Code Manager notes the preference for the obligation effective date to be tied to the MHHS programme, notably M11 which is the start of migration for Advanced Meters. There is limited detail within the responses that

		demonstrates the benefit of tying the obligation to M11. The Code Manager therefore requested additional input from respondents.
IMServ Europe Ltd (Data Collector)	Yes	-
Scottish Power (MEM)	Yes	-
British Gas (Energy Supplier)	Yes	-
OVO/IHTL (Energy Supplier and MEM)	OVO does not agree with the proposed legal text in line with the reasons stated above.	No additional Code Manager comments

Question 6:	Do you agree with the proposed implementation date and implementation technique? If not, please explain why,	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Siemens (Metering Equipment Manager)	Yes, we agree.	-
IMServ Europe Ltd (Data Collector)	Yes	-

Scottish Power (MEM)	Yes	-
British Gas (Energy Supplier)	Yes.	-
OVO/IHTL (Energy Supplier and MEM)	No, OVO does not agree with the proposed implementation date and implementation technique. This modification should be rejected.	No additional Code Manager comments

Question 7:	Based on the Business Case Assessment and Case for Change, do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation, either on 30 June 2023, or the standard release determined by the date of Authority approval? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Siemens (Metering Equipment Manager)	Yes, we agree.	-
IMServ Europe Ltd (Data Collector)	Yes	-
Scottish Power (MEM)	Yes	-
British Gas (Energy Supplier)	We believe this change needs to be fully aligned with the Market Wide Half Hourly programme.	Code Manager comments on tying the obligation effective date to an MHHS milestone are provided against Question 5.

	Suppliers have been managing issues related to non-communicating sites and balancing the benefits of achieving full communication against the additional costs and inconvenience placed on their customers to resolve these issues on a case-by-case basis.	
OVO/IHTL (Energy Supplier and MEM)	No, as above.	No additional Code Manager comments.

Question 8:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Siemens (Metering Equipment Manager)	No other comments.	-
IMServ Europe Ltd (Data Collector)	No	-
Scottish Power (MEM)	None	-
British Gas (Energy Supplier)	-	-
OVO/IHTL (Energy Supplier and MEM)	1) OVO agrees changes that are intrinsic to the implementation of MHHS should be led by, and centralised within, the MHHS Programme.	The Code Manager acknowledges that there are circumstances where meeting the

	2) OVO welcomes the introduction of all reasonable steps in the R0015 solution aligning with the Supplier SLCs. However, the SLC 12 does not place an obligation on domestic AMRs to have continuous comms. This is a new obligation that is being proposed under this change only. Furthermore, due to the ability for domestic customers that have Advanced Meters in comms to opt out, and due to there being domestic sites with Advanced Meters where it is not possible for comms to be installed after all reasonable steps have been taken, there will always be a cohort of Advanced Meters where the installation of comms is untenable.	obligation may not be possible, and this has been acknowledged in the change reports. However, the aim of the MHHS programme is to achieve HH settlement for all consumers and to do that, remotely accessible HH data is the critical building block. If Licence changes are necessary to address discrepancies between Domestic and Non-Domestic Consumers with regard to their metering arrangements, the Code Manager is confident that Ofgem will consider this as part of the wider programme.