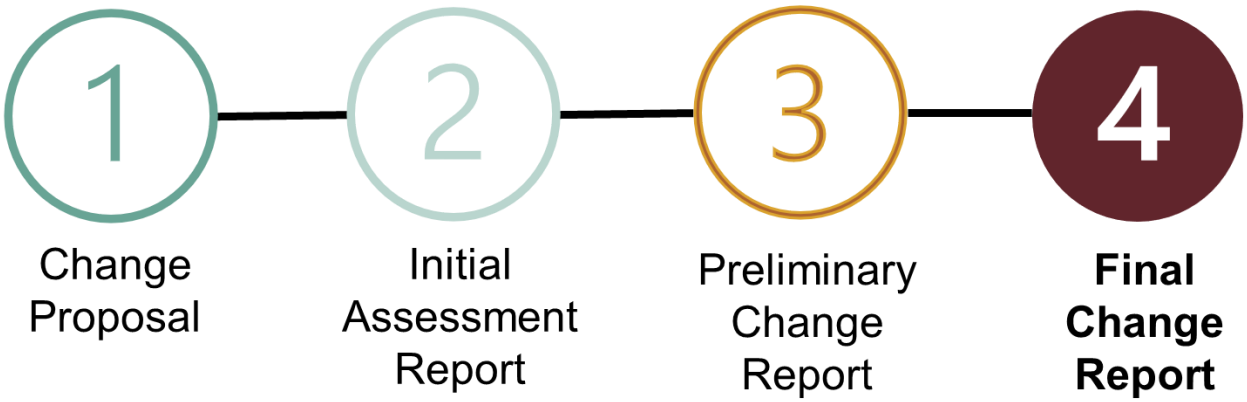
RETAIL ENERGY CODE

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FINAL CHANGE REPORT



PURPOSE:	The Final Change Report sets is the final stage of the Change Proposal, following consultation of the Preliminary Change Report. The Code Manager will set out their final assessment and recommendation, clarifying any changes made from the Preliminary Change Report.
NOTES:	There are three versions of the Final Change Report: one is issued the Responsible Committee for decision; one is published after the vote; and (if Authority Approval is required) one is published after the Authority determination.
NEXT STEPS:	The Final Change Report will be issued to the Responsible Committee who will vote to either approve or reject the Change Proposal, considering the recommendation of the Code Manager.

RETAIL ENERGY CODE

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

FINAL CHANGE REPORT

R0018 – COMPLEX SITES PROCESS IMPROVEMENTS

DOCUMENT VERSION	1.0
DATE ISSUED	29/04/2022
DOCUMENT APPROVAL STATUS	APPROVED

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

LEAD ANALYST	Jonathan Holland	EMAIL
TECHNICAL LEAD	Beth Brown	EMAIL

CHANGE OVERVIEW

	High Impact: N/A
	Medium Impact: N/A
	Low Impact: Electricity Suppliers, Electricity Metering Equipment Managers, Half Hourly Data Collectors, Distribution Network Operators.

This change proposes updates to the current Complex Sites Supplementary Information Form (CSSIF) in Schedule 14 – Metering Operations. It seeks to provide clear and concise guidance on the data needed when completing the form to help improve accuracy.

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0018 is **APPROVED** for implementation on 04 November 2022.

RETAIL ENERGY CODE

CONTENTS

BACKGROUND		
1.	SUMMARY	4
2.	PROBLEM STATEMENT	4
3.	USER STORIES	5
PROPOSAL		
4.	SUMMARY OF ANALYSIS UNDERTAKEN	5
5.	SUMMARY OF IMPACT ASSESSMENT ACTIVITY	5
6.	DELIVERY AGAINST CHANGE PROPOSAL PLAN	7
7.	KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES	7
8.	PROPOSED SOLUTION	7
9.	DRAFT LEGAL TEXT	8
10.	PROPOSED IMPLEMENTATION DATE AND APPROACH	8
11.	CHANGE PATH	8
12.	RESPONSIBLE COMMITTEE	8
13.	SUMMARY OF CONSULTATION RESPONSES	8
14.	SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION	9
15.	BUSINESS CASE ASSESSMENT	9
16.	CASE FOR CHANGE	9
17.	CODE MANAGER'S RECOMMENDATION	10
18.	APPENDIX	10

RETAIL ENERGY CODE

BACKGROUND

1 SUMMARY

‘Complex Sites’ are defined as sites for which the Meter Technical Details are too complex to be captured in the standard D0268 ‘Half Hourly Meter Technical Details’ Market Message.

Balancing and Settlement Code Procedure (BSCP) 502 (‘Half Hourly Data Collection (HHDC) for Supplier Volume Allocation (SVA) Supplier Metering Systems Registered in (SMRS’)) and REC Schedule 14 (‘Metering Operations’) include provisions for ‘Complex Sites’, providing guidance and clarification on the appropriate Settlement arrangements for various types of these sites.

In recent years Elexon have received questions (from Energy Suppliers and other interested parties) on the scope of these arrangements. Confusion over the current Complex Site procedures was also identified as a key factor in the lessons learn session related to a high materiality BSC Trading Dispute.

Elexon Issue 88 (Clarification of BSC Arrangements relating to Complex Sites) was raised by them to clarify any ambiguities and to identify process weaknesses and improvements. The Issue 88 Workgroup recommended a number of improvements to the Complex Site process, including mandating the use of the CSSIF, clarifying the data/information to be shared and the creation of a new standardised CSSIF.

The Complex Sites process is consistent across REC Schedule 14 and BSCP502 (as it is a duplication of the process for MEMs and HHDCs); therefore, changes proposed to BSCP502 from Issue 88 will also need to be reflected in the REC.

2 PROBLEM STATEMENT

There is not a consistent understanding of the Complex Site process which can lead to the CSSIF being populated or interpreted differently by different parties. This may lead to incorrect data being used for consumer billing and Settlement, which can result in Balancing and Settlement Code (BSC) Trading Disputes.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As an electricity Consumer, I want my metering data to be accurate, to ensure my account is set up correctly and I receive accurate and timely invoices.
MARKET PARTICIPANT USER STORIES	
M1	As a Metering Equipment Manager (MEM), I want to have clarity on my obligations to provide data - specifically what data I need to send, who the recipients are and when I need to send it. To ensure I provide accurate data to other Market Participants.
M2	As an Electricity Supplier, I want to receive accurate and complete Meter Technical Details (MTD) to enable me to take appropriate action following a change of metering equipment, a switch, a change of HHDC, a new connection a meter configuration or MEM.
M3	As an Electricity Distribution Network Operator (DNO), I want to receive accurate and complete MTD to enable me to take appropriate action following a change of metering equipment, a switch, a change of HHDC, new connections, meter configuration or MEM.
M4	As a Half Hourly Data Collector (HHDC), I want to receive accurate and complete Meter Technical Details to enable me to take appropriate action following a change of metering equipment, change of supplier, change of HHDC, new connections, meter configuration or MEM.

PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

Analysis of the problem and Solution Development was carried out by Elexon as part of Issue 88. This issue group recommended changes to the CSSIF and the associated legal text to ensure the correct data was being captured by the MEM and also to give clarity when the CSSIF should be completed. The use of the CSSIF is set out in REC Schedule 14 – Metering Operations and BSCP502.

5 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

5.1 REC PARTY IMPACT ASSESSMENTS

Electricity Suppliers, Electricity MEMs, HHDCs and DNOs were targeted with an Impact Assessment on the proposed solution.

Two non-confidential responses were received, one from a MEM and one a HHDC.

5.2 REC PARTY IMPACT ASSESSMENTS

METERING EQUIPMENT MANAGER	• Agreed with the changes proposed and considered them as non-material housekeeping changes • A two-month lead time would be required to implement the changes • Only operational documents and procedures need to be updated • No tangible Costs or Benefits were identified
HALF HOURLY DATA COLLECTOR	• Agreed with the changes proposed • A one-month lead time would be required to implement the change • No tangible Costs were identified • Agreed that the new CSSIF will help to ensure the correct data is captured

COMMENTS RECEIVED FROM MEM	RESPONSE FROM THE CODE MANAGER
Should there be a centrally held register of email addresses to send the CSSIF?	The current mechanism of sending the CSSIF and to who is agreed between the MEM and Energy Supplier and is not being changed as part of this Change Proposal
Guidance for Complex Sites previously in BSCP514 Section 8.4 was useful when discussing complex sites. This doesn't appear to have been transferred into the REC. Is there a reason why this hasn't been transferred?	BSCP514 has transitioned to the REC metering Operational Schedule, however, the guidance on Complex Sites was under review and new guidance will be issued outside of this Change Proposal by BSC.
Is there a possibility to look at process improvements around the sending the CSSIF and the exploration of alternatives to using the CSSIF?	This is outside of the scope of this Change Proposal. However, it could be looked at as a future improvement to the process if a Change Proposal was raised

COMMENTS RECEIVED FROM HHDC	RESPONSE FROM THE CODE MANAGER
User Stories do not account for Change of Supplier or Change of HHDC, or New Connections	User Stories updated to reflect these scenarios
Impact Parties are listed as medium impacting in the Initial Assessment Report.	Following analysis of the solution the impact to REC Parties has been updated from medium to low.

6 DELIVERY AGAINST CHANGE PROPOSAL PLAN

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

	FROM	TO
PARTY IMPACT ASSESSMENT ISSUED	20/01/2022	10/02/2022
PRELIMINARY CHANGE REPORT ISSUED	21/02/2022	21/02/2022
RESPONSIBLE COMMITTEE DECISION – EX-COMMITTEE	03/03/2022	03/03/2022
CONSULTATION	07/03/2022	01/04/2022
FINAL CHANGE REPORT ISSUED	29/04/2022	29/04/2022
RESPONSIBLE COMMITTEE DECISION	11/05/2022	11/05/2022
APPEAL WINDOW	13/05/2022	27/05/2022

7 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

7.1 RISKS AND ISSUES

No risks or issues have been identified.

7.2 ASSUMPTIONS AND DEPENDENCIES

No.	DEPENDENCY	NOTES	STATUS
D1	There is a dependency on the corresponding BSC change making equivalent changes and defining the new CSSIF and any supporting guidance.	The Code Manager will work with Elexon, to ensure that the solution proposed through this Change Proposal fully aligns with the equivalent BSC changes.	Open

8 PROPOSED SOLUTION

The solution proposes to replace the current CSSIF in Schedule 14 – Metering Operations with a new form, and to add clear guidance into the main body of the schedule, setting out when a CSSIF should be submitted by a MEM.

This Change Proposal is a consequential change following the conclusion of BSC Issue 88. The REC Code Manager and Elexon have worked collaboratively on the proposed solution.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0018 can be found on the Change Proposal Page in the REC Portal.

10 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	04/11/2022

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

Following engagement with BSC, we propose this change is implemented in a standard REC release on the 04 November 2022. This would enable simultaneous implementation of the new form across BSC and REC.

11 CHANGE PATH

CHANGE PATH	SELF-GOVERNANCE

12 RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

13 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 04 March 2022 to obtain views on the Preliminary Change report. In total five responses were received, one Energy Supplier, one Date Collector and three MEMs. The key themes from these responses have been summarised and set out below.

13.1 SUMMARY OF RESPONSES

13.1.1 COMMENTS ON THE SOLUTION

Responding Parties agreed with the proposed solution. Allthough no tangible benefits were identified, respondants stated standardising the CSSIF form and mandating the use will improve processes, by reducing uncertainty and ambiguity. It was also stated using the new CSSIF form may also reduce errors, queries and the need for corrections.

13.1.2 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

Parties who responded agreed with the Code Manager's assessment of the Change Path.

13.1.3 IMPLEMENTATION APPROACH AND DATE

Those Parties who responded agreed with the Code Manager's recommended implementation date of 04 November 2022.

14 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

DOCUMENT	SECTION	AMENDMENT	CODE MANAGER COMMENTS
Metering Operations Schedule	20.15.4	The redlined legal text has been updated. The previous version stated this change is to 'Validate metered volumes' whereas the change defined in the redline legal text for BSCP502 stated 'Validate Metered Volumes AND Aggregated Output of Complex Site Rule'.	The Metering Operation Schedule redline document has been updated to align with BSCP502.

15 BUSINESS CASE ASSESSMENT

The intention of this Change Proposal is to make a number of improvements to the Complex Site process. This includes mandating the use of the CSSIF, clarifying the data/information to be shared (when and with whom) and the creation of a new standardised CSSIF.

If this Change Proposal is implemented, it will remove any uncertainty for the MEM on the Complex Site process. It will result in the correct data being used for consumer billing and Settlement, reducing BSC Trading Disputes.

16 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.
- A positive business case can be made.
- By not implementing this Change Proposal we will continue to see incorrect data being sent using the current CSSIF, and CSSIFs not being consistently sent following visits to consumers premises. Consequently, incorrect data will be used for consumer billing and Settlement, which may result in BSC Trading Disputes.

17 CODE MANAGER'S RECOMMENDATION

Based on the evidence in sections 15 and 16 of this report, the Code Manager considers a positive business case has been 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.

18 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link to EMAR
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
CONSOLIDATED CONSULTATION COMMENTS AND CODE MANAGER'S RESPONSES	Link
RELATED CHANGE	Issue 88 'Clarification of BSC Arrangements relating to Complex Sites'