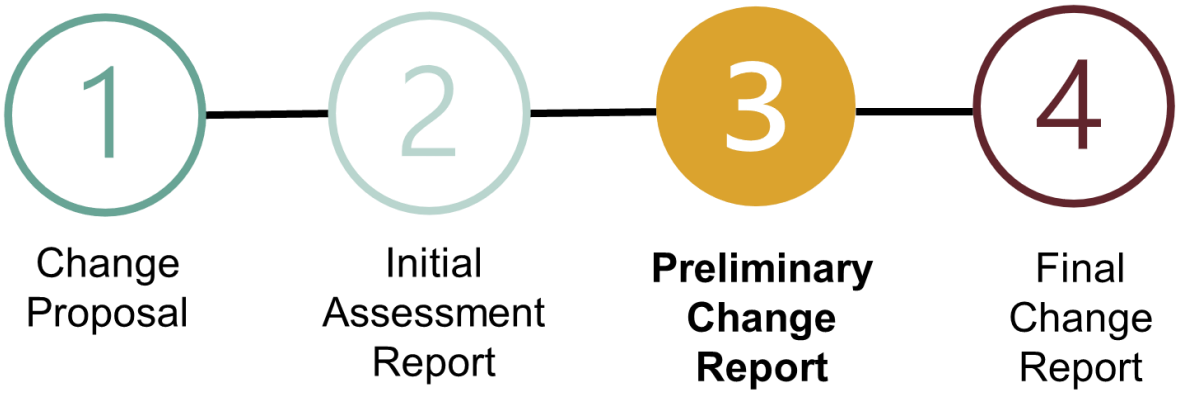
RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

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.

PRELIMINARY CHANGE REPORT

R0018 – COMPLEX SITES PROCESS IMPROVEMENTS

DOCUMENT VERSION	1.0
DATE ISSUED	18/02/2022
DOCUMENT APPROVAL STATUS	APPROVED BY RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

LEAD ANALYST	Jonathan Holland	EMAIL
TECHNICAL LEAD	Beth Brown	EMAIL

CHANGE OVERVIEW

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.

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

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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 for SVA 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 complex site.

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 learned session related to a high materiality BSC Trading Dispute.

Elexon Issue 88 (Clarification of BSC Arrangements relating to Complex Sites) was raised by Elexon to clarify the 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 when) 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 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, 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, ac switch, a change of HHDC, new connections, meter configuration or MEM.
M4	As a Half Hourly Data Collector, 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 it was clear 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.

METERING EQUIPMENT MANAGERS	• Agreed with the changes proposed and consider 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 is under review and new guidance will be issued outside of this Change Proposal
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 to low.

Other comments from both the MEM and HHDC relating to the use of the fields in the CSSIF were previously address in the BSC Issue 88 working group. Targeted response to the respondents will take place to share that update/clarification.

6 DELIVERY AGAINST CHANGE PROPOSAL PLAN

	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

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

7 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

7.1 RISKS AND ISSUES

No risks or issues have been identified that would affect the progression of the Change Proposal.

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 proposed solution is to change the current CSSIF in Schedule 14 – Metering Operations for 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 BUSINESS CASE ASSESSMENT

The intention of this Change Proposal is to make a number of improvements to the Complex Site process, including 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 and clear up any doubt 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.

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.
- A positive business case can be made, as set out in section 13 of this report.
- By not delivering this Change Proposal we will continue to see incorrect data being sent using the current CSSIF, as well as CSSIFs not being sent following visits to consumers in all cases. Resulting in incorrect data being used for consumer billing and Settlement, which can result in BSC Trading Disputes

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 of this Preliminary Change Report for R0018 will be published on the REC Portal on **07 March 2022**. and will close on **01 April 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 responses.

The Final Change Report will be issued to Metering Expert Panel to make its determination.

17 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link to EMAR
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link