RETAIL ENERGY CODE

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CHANGE PROPOSAL PLAN

R0021 – ALLOW A REC MEM TO DE-ENERGISE AND RE-ENERGISE ANY METERING POINT WITHOUT THE NEED TO BE INSTRUCTED BY A SUPPLIER

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RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

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CHANGE OVERVIEW

Currently only the Registered Supplier can instruct a MEM to work on their metering asset. There is no ability to request that a single MEM completes work on multiple properties, that may have different Electricity Suppliers. This creates a number of barriers to developing solutions for local authority, private and social housing landlords refurbishing premises or to help deliver new technology such as the retro-fit of Electric Vehicle Charging (EVC) Points to premises. The Change Proposal will introduce a new role for existing accredited MEMs that will enable them to accept instructions to undertake a limited set of activities at the request of the premise owners and occupiers without the need to use the Registered Suppliers' MEMs.

1 RE-BASELINE ACTIVITY

The REC Change Proposal has been developed in co-operation with the DCUSA Working Group for their Change Proposal - DCP394, with the REC being the Lead Code.

The Initial Assessment Report set out the proposed solution and was issued on 22 April, closing on the 17 May.

Membership of the DCUSA Working Group is well supported by Distribution Network Operators (DNO) and Metering Equipment Managers (MEM), however, it is relatively light in participation by Suppliers. This has been borne out in the consultation responses to the proposed solution, 13 parties responded, of which 8 were received from Suppliers, 3 from DNOs and 2 from MEMs. As well as providing feedback on the questions we posed, the respondents raised 46 supplementary questions.

Before moving to publication of the full Preliminary Change Report (PCR), we are proposing to host a REC Webinar on the 5 July in order to provide an opportunity for the Code Manager to respond to the feedback we've received, clarify the requirements of the proposal with Parties and address the questions they've raised. This will allow parties an opportunity to further clarify any remaining points before we produce an updated PCR.

This will necessitate a re-baselining of the Change Proposal Plan as follows:

KEY MILESTONES

	APPROVED DATES		RE-BASELINED DATES	
	FROM	TO	FROM	TO
SOLUTION DEVELOPMENT	03/02/2022	19/04/2022	03/02/2022	19/04/2022
PARTY IMPACT ASSESSMENT ISSUED	22/04/2022	17/05/2022	22/04/2022	17/05/2022
DEADLINE FOR ALTERNATIVE CHANGE PROPOSAL SUBMISSION	27/05/2022	27/05/2022	27/05/2022	27/05/2022
INTERMIN PRELIMINARY CHANGE REPORT ISSUED	27/05/2022	27/05/2022	27/05/2022	27/05/2022
REC PARTY WEBINAR			05/07/2022	05/07/2022
UPDATED PRELIMINARY CHANGE REPORT ISSUED			08/07/2022	08/07/2022
RESPONSIBLE COMMITTEE REVIEW PCR			08/07/2022	08/07/2022
CONSULTATION ISSUED	10/06/2022	01/07/2022	12/07/2022	02/08/2022
FINAL CHANGE REPORT ISSUED	05/07/2022	04/07/2022	26/08/2022	26/08/2022
RESPONSIBLE COMMITTEE DECISION	19/07/2022	19/07/2022	14/09/2022	14/09/2022
APPEAL WINDOW CLOSURE	04/08/2022	04/08/2022	28/09/2022	28/09/2022

2 SCOPE

2.1 IN SCOPE

The Code Manager will need to review the Accreditation Process to allow the introduction of a new type of role for Meter Equipment Managers (MEM) – a Safe Isolator Provider (SIP). The SIP will be required to accede to the DCUSA before being able to work independently on behalf of the owners or occupiers of premises. Consideration will need to be given to any, assurance or audit requirements that may be needed to mitigate any specific risks introduced by the creation of this new role.

The Code Manager will need to consider any special need of occupants of properties and how the SIP can have access to relevant information in advance of carrying out the work to ensure that data protection and privacy considerations form part of the solution.

The SIP will need to understand their responsibilities and the mechanisms by which they need report evidence of meter tampering or other unsafe situation to the Registered Supplier or the DNO.

The SIP will need to understand the limitation of activities they are permitted to undertake when employed as a SIP and not as a MEM, and the solution will define the limit of the scope of these activities.

2.2 OUT OF SCOPE

The SIP will need to separately accede to DCUSA before being able to undertake any work on properties, and these requirements are being addressed under DCUSA Change Proposal (DCP) 394.

Any settlement impacts are being addressed by the Balancing & Settlement Code (BSC), and any requirements to provide information to the Registered Supplier related to periods of time where the meter isn't recording any consumption will be addressed separately by a BSC Change Proposal if necessary.

3 PROJECT STRUCTURE AND ORGANISATION

3.1 POINTS OF CONTACT

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3.2 REQUIRED ACTIVITIES

3.2.1 ANALYSIS AND SOLUTION DEVELOPMENT

The REC Change Proposal was raised in response to the DCUSA Change Proposal DCP 394, and the solutions are being developed jointly with the DCP394 Workgroup. At the conclusion of the development of the solution, a joint DCUSA and REC Consultation will be conducted which

will enable the changes to be approved separately under each code, but in an aligned timeframe, with the REC as the Lead Code.

REC Role: The solution will need to allow for the development of a new market role of a Safe Isolator Provider (SIP) that will only be open to already accredited REC MEMs.

- The accreditation process will need to consider assurance or audit requirements for the new roles, so that any specific risks introduced by the creation of this new role can be addressed or mitigated.
- Confirmation of the SIP's accession to DCUSA before authorised to act as a SIP.
- A defined scope of activities that the new SIP will be able to undertake will need to be set out in the REC, to ensure that there is separation of activities that a MEM can perform versus that which a SIP is able to do. The requirement must be clear that the SIP must not overstep the boundaries of their role to undertake any MEM activity whilst on site as a SIP unless they are also the Registered Supplier Appointed MEM and are requested to act by the Registered Supplier.

Communications: The solution also needs to consider what communications are needed between the SIP and the Registered Supplier or DNO in relation to certain circumstances, such as danger, damage or interference:

- One option to be explored is the use of SDEP to send market messages between the SIP and the Registered Supplier to provide updates where the SIP has determined that it is not possible or desirable to leave the site re-energised. This could be where there is evidence of meter tampering, or where communications aren't re-established when a smart meter is re-energised, and it will be necessary for the supplier to have their appointed MEM attend the site to address the problem.
- An alternative option would be to use existing Market Messages over the DTN, but this would need a new market role for the SIP where the DTN gateway may allow the delivery of certain Market Messages to the Registered Supplier from any SIP.
- A non-message-based alternative would be to have an equivalent point of contact within the Supplier's business (as per the DNO approach for Category A, B and C Notices relating to danger, damage, and/or interference) to receive prompt and appropriate notification by phone or email/post when there is an urgent need to make the supplier aware that they will need to attend the site.

Theft Reports: How the SIP will be able to report information related to theft, and what information they are required to collect and provide.

- Should they have the same obligations to collect data as the Registered Supplier's appointed MEM,
- Should they be required to alert Crimestoppers where the Registered Supplier is unknown.

Vulnerable Occupiers: For information related to occupier's vulnerability and any special precautions that need to be put in place before the site may be visited or the supply may be de-energised, there are alternative options that may be evaluated:

- The DNO may be able to provide the information to the SIP in response to a request before work is commenced, since they hold the information on their systems for each supply point.
- Whether it is possible to require the SIP to receive confirmation that the landlord has established whether there are any occupied properties that have tenants with special needs that need to be managed before work can commence.
- Exploration of whether the information is available to the REC MEM by any other mechanism. Should the SIP be required to collect the information from the occupier before commencing work.
- Consideration of GDPR and the issue of Consent in respect of the information being provided to the SIP in advance of the work commencing.

3.2.2 IMPACT ASSESSMENT

Parties will be invited to consider the solution options during a party impact assessment (open for a period of 15 working days) and conducted jointly with DCUSA so that any impacts are understood and feed into the selection of a preferred set of solutions. No Service Providers are expected to be impacted by the solutions being developed, therefore no Service Provider Impact Assessment will be carried out.

3.2.3 PRELIMINARY ASSESSMENT

Following the Impact Assessment, the responses to both the REC and DCUSA consultations will be reviewed and considered, and a final set of solution options will be selected based on the responses and the impacts identified. The case for change and the Code Manager's Recommendation will be set out, along with the proposed Legal Text and the Preliminary Change Report will be issued for a 15 Working Day consultation.

3.2.4 FINAL ASSESSMENT

Following the consultation period and the review of responses to both the DCUSA and the REC Change Proposals, a Final Change Report with the Code Manager's Recommendation will be drafted for the decision of the Change Panel.

3.3 STAKEHOLDER ENGAGEMENT PLAN

3.3.1 IMPACT ASSESSMENT PLAN

Solution Options will be worked through in Joint REC and DCUSA Workgroups between now and 8 April 2022, The Impact Assessment will be issued to REC and DCUSA parties for comments on 22 April 2022. Following the Initial Assessment, the workgroup will review the consultation responses and proceed to develop a single solution which will go forward in the Preliminary Change Report.

3.3.2 CONSULTATION PLAN

Two consultations will be conducted, the initial one as part of the Impact Assessment process and this will open on the 22 April 2022 and will close after 15 Working Days on 17 May 2022. This consultation will align with the DCUSA Change Proposal consultation dates.

The second consultation will take place when the solution options have been narrowed down to a preferred solution and consultation responses have been addressed and we are targeting a 15 Working Day consultation beginning on the 12 July 2022 and ending on the 2 August 2022.

3.3.3 CROSS CODE ENGAGEMENT

The DCUSA Change Proposal was initially brought to the Cross Code Steering Group (CCSG) and the REC, the Smart Energy Code (SEC)and Balancing & Settlement Code (BSC) were considered as potentially impacted codes. The discussion at the CCSG identified that a solution will require a significant change to the REC as well as accession to the DCUSA for parties wishing to perform the activities set out in the DCUSA Change Proposal, therefore the REC is considered to be the Lead Code for the purpose of Cross-Code Engagement. The SEC determined that there was no impact to their code, however they put forward a recommendation to include a requirement in the REC for the SIP to notify the Registered Supplier in the event of Communications not being re-established following re-energisation, which has been incorporated. The BSC have indicated that there are no BSC Changes needed to implement these proposals, however, this will be kept under review as the solution is finalised.

3.4 RAID

3.4.1 ISSUES

No.	ISSUE	NOTES	HOW TO PROGRESS
1.	Consumption gap when meter is not connected	Supplier needs to account for consumption gap in settlement to avoid estimated consumption being used. Not a material issue if supply is de-energised for a short period.	BSC to consider if any changes are needed.

3.4.2 DEPENDENCIES

No.	DEPENDENCY	NOTES	STATUS
1	DCUSA DCP394 needs to be approved to allow SIPs	Joint workgroup looking at an end-to-end solution.	In Development

	to de-energise without Supplier Agent involvement		

3.5 DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS

SUBMISSION DEADLINE	27/05/2022