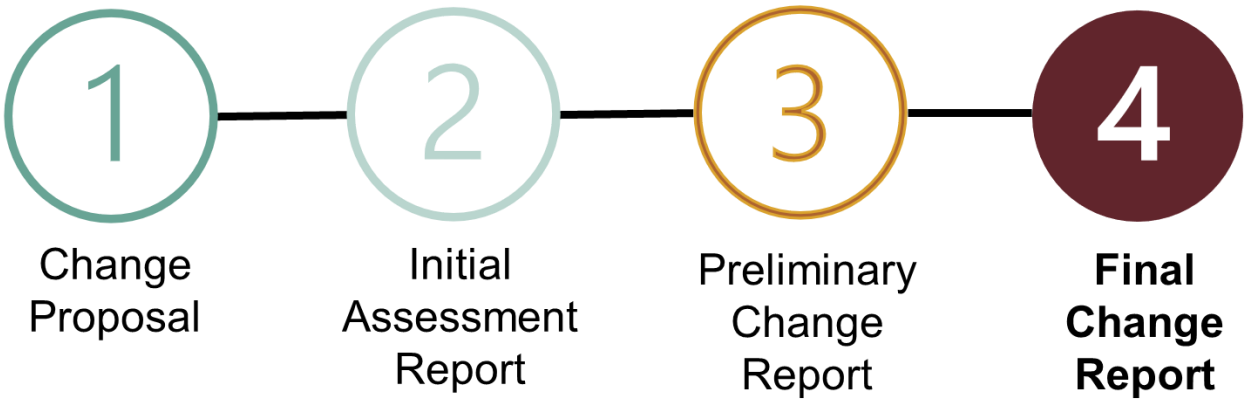
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FINAL CHANGE REPORT



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

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

DOCUMENT VERSION	2.0
DATE ISSUED	14/09/2022
DOCUMENT APPROVAL STATUS	POST PANEL VOTE

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

LEAD ANALYST	COLETTE BALDWIN	EMAIL
TECHNICAL LEAD	RYAN DALE	EMAIL
ASSURANCE LEAD	ELIANA CAMPBELL	EMAIL

CHANGE OVERVIEW

Currently only the Registered Supplier can instruct a Metering Equipment Manager (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 barriers to developing solutions for local authorities, private and social housing landlords who are refurbishing premises or to help any premise owner (whether domestic or non-domestic) install new equipment to facilitate Low & Zero Carbon Technology (LZCT) installation such as the retro-fit of Electric Vehicle Charging (EVC) Points to homes and business premises. This 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 without the need to use the Registered Suppliers' MEMs.

	High Impact: Metering Equipment Managers, Distribution Network Operators
	Medium Impact: Suppliers
	Low Impact: N/A

RESPONSIBLE COMMITTEE DECISION

The Metering Expert Panel voted to recommend to the Authority that Change Proposal R0021 should be **APPROVED** for implementation on 30 JUNE 2023.

RETAIL ENERGY CODE

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RETAIL ENERGY CODE

BACKGROUND

1 SUMMARY

Currently only the Registered Supplier can instruct a Metering Equipment Manager (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 barriers to developing solutions for local authorities, private and social housing landlords who are refurbishing premises or to help any premise owner (whether domestic or non-domestic) install new equipment to facilitate Low & Zero Carbon Technology (LZCT) such as the retro-fit of Electric Vehicle Charging (EVC) Points to homes and business premises. This Change Proposal will introduce a new role for existing accredited MEMs - a Safe Isolator Provider (SIP) that will enable them to accept instructions to undertake a limited set of activities at the request of the premise owners without the need to use the Registered Suppliers' MEMs.

2 PROBLEM STATEMENT

It is difficult for landlords of local authorities, social housing developments or private landlords of homes and businesses to co-ordinate the refurbishment of properties where they need the electricity supply to be de-energised to allow work being completed and the supply re-energised. Currently the landlord needs to liaise with the Electricity Supplier of each premise independently to arrange for the appointed MEM to attend and de-energise each supply point and then re-energise the site when the work is completed, as currently only the Registered Supplier's appointed MEM or the Distribution Network Operator (DNO) is permitted to undertake the work.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As a property owner or an owner occupier, I want to be to arrange for the installation of equipment for use by the occupier, such as fitting an isolator, installing on-site generation equipment or electric vehicle charging points. I want the installer to use a Safe Isolator Provider (SIP) who is authorised to undertake the work at my instruction rather than arrange for this work to be completed through the premises' Registered Suppliers.
MARKET PARTICIPANT USER STORIES	
M1	As a REC Accredited Metering Equipment Manager, I want to be able to work as a SIP and de-energise and re-energise a site on the instruction of the homeowner/landlord, so that equipment – such as an isolator, on-site generation or electric vehicle charging points can be fitted without the need to co-ordinate the work with the Registered Suppliers' MEMs.
M2	As a Distribution Network Operator, I want to be assured that the work is only completed by a SIP that has the necessary skills and REC accreditation and has the appropriate permissions to de-energise and re-energise the supply and doesn't introduce any additional risk to the Distribution Network.

REF.	USER STORIES
M3	As the Registered Supplier, I want to know what steps the SIP will take, who attends the site and finds the site in an unsafe situation to re-energise, so that my customer is not left off-supply unnecessarily.
M4	As the Registered Supplier, I want to be alerted if the SIP finds any evidence of meter tampering at the premises.

PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

In collaboration with the Distribution Connection and Use of System Agreement (DCUSA) Working Group for DCUSA Change Proposal 394 (DCP394), the proposed role of the SIP was explored. The group, having worked through a range of issues, established that the SIP should have a limited role and only be allowed to undertake a narrow scope of works that would be defined by their accession to DCUSA.

The workgroup considered the activities, and it became clear that a precedent was necessary that the SIP was an existing REC Accredited MEM so that the Suppliers and DNOs who are acceded to DCUSA already would have confidence that the SIP would be appropriately qualified and subject to a strong accreditation and assurance regime under the REC.

A joint REC/DCUSA Workgroup reviewed the necessary communications that parties felt would be needed to communicate. A matrix of possible communications was prepared and provided to the REC Code Manager's Technical Services team (RTS) to enable them to assess the impact on Market Messages.

Following this activity by RTS, an Impact Assessment was conducted with REC Parties and a summary of the responses is provided below.

5 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

5.1 REC PARTY IMPACT ASSESSMENTS

A Party Impact Assessment Request was published by the Code Manager on 22 April 2022, inviting REC Parties to provide their responses by 17 May 2022. There were 13 responses received from Parties of which three were marked as Confidential. The non-confidential responses received are contained in Appendix 1. In terms of the parties who responded there were responses from eight Suppliers, three DNOs, and two MEMs.

ENERGY SUPPLIERS	• There was clearly a misunderstanding on the distinction between a REC Accredited MEM and the role of the SIP under these new arrangements. The role of the SIP is deliberately limited so as not to interfere with normal Supplier-MEM appointments and their roles and responsibilities. Challenges were raised in respect of the liabilities on SIPs in respect of

	third-party damage or faults, including the impact on Energy Consumers. • Clarity was not yet available on costs and benefits. Some parties asked for views on the number of jobs that SIPs would undertake. • There was broad support for the introduction of a Role Code for the SIP and changes to Scenario Variants for Market Messages to allow SIPs to send relevant data flows, using the Data Transfer Network (DTN) rather than using the Secure Data Exchange Portal (SDEP) or email communications. This would allow suppliers to receive relevant information from the SIP which would not interfere with normal MEM communications from the Supplier's Appointed MEM. • Implementation timescales varied, with respondents indicating that the proposed solution could be implemented in a range of timescales between 8 weeks and 18 months. No Supplier provided any costs estimates. • There was a mix of views on whether there were benefits to Consumers – with some parties feeling that Consumers would be able to get access to services which they aren't always getting quickly, whilst others felt there may be detriment to suppliers who would face increased costs and activities from its implementation.
DISTRIBUTION NETWORK OPERATORS	• DNOs were broadly supportive of the proposal. • The main challenges came from concerns related to Category B notifications related to Smart Metering Installations and the work that DNO's are funded for in this respect. They want to understand how this solution might impact those processes and ensuring that funding was appropriately apportioned to the correct revenue stream, as well as clarity on Ofgem reporting being maintained. • Some DNOs believed that this would allow SIPs to take on more of the activities that they undertake now, which will free up resources for them to focus on maintaining and improving the network for Net Zero targets. • One DNO indicated that they receive many thousands of requests for this activity each year and so there would be benefit in having alternative providers operating in the market. • Information on costs have been provided by one DNO, however, this is subject to clarifications on parts of the process.
MEM	• One MEM responded on a non-confidential basis, so the feedback is specific to that one organisation rather than representative of a broader constituency.

	• The MEM was broadly supportive of the approach and supported the DTN solution as the mechanism to send communications between relevant parties. • There was a feeling that these arrangements would also help develop solutions for R0043 (DCP400) which is looking to introduce a Crowded Meter Room Co-ordinator. • The MEM felt that User Stories related to their role should be included that would contain notifications to the Appointed MEM when the SIP undertakes work, or if the site remained de-energised for more than 12 hours to reduce the requirement for unnecessary site visits. • Implementation approach and timeline were felt to be relatively simple and easy to implement, so wouldn't require a lengthy lead time.

It was encouraging to receive such substantial feedback to the Party Impact Assessment Request. Forty-seven questions were raised in the feedback received that needed to be addressed as we refined the solution requirements.

FOLLOWING THE IMPACT ASSESSMENT

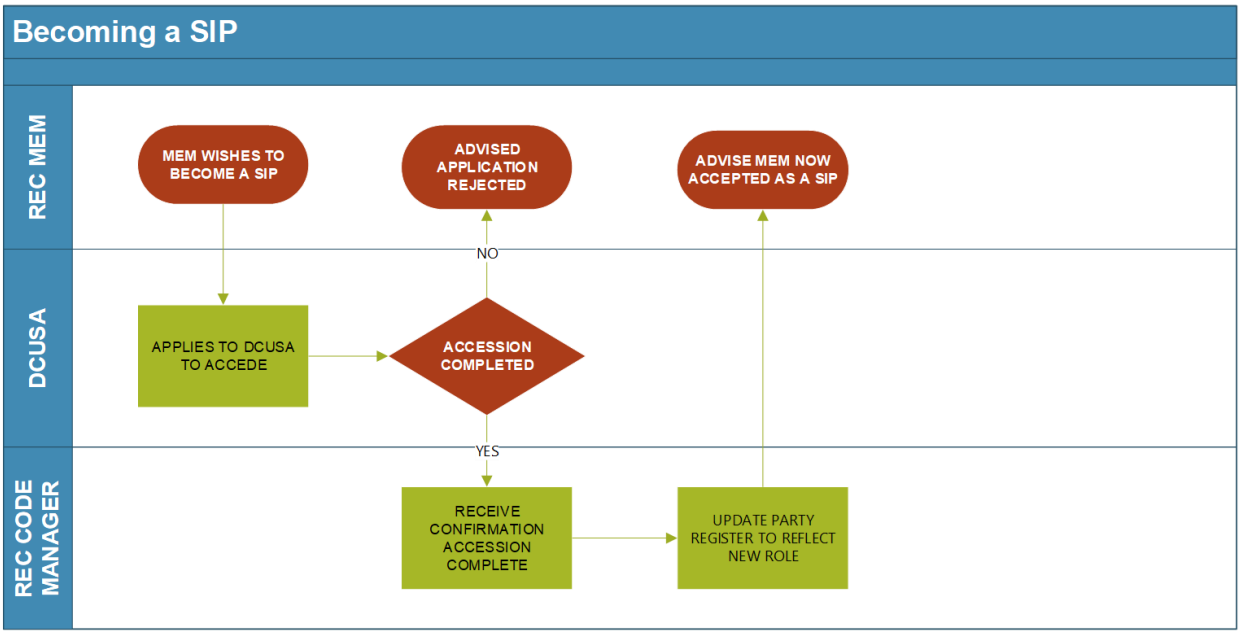
To help address these questions and to provide the clarity on the proposed solution, the REC Code Manager hosted a REC Webinar Event (with support from the DCUSA Code Administrator) to which all interested parties were invited and we were encouraged to have 48 attendees participating.

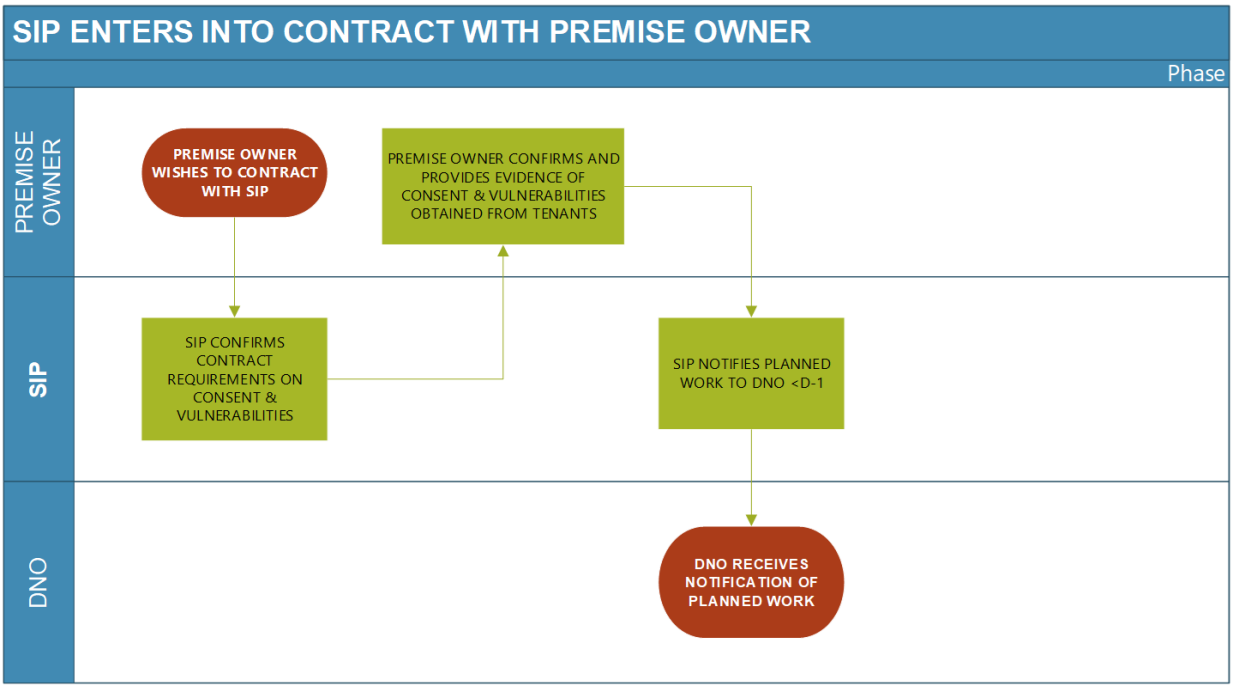
A comprehensive FAQ document was prepared and published on the Change Proposal Page of the REC Portal and was circulated to those registering to attend the Event in advance of the meeting. A link to the FAQ document can be found here

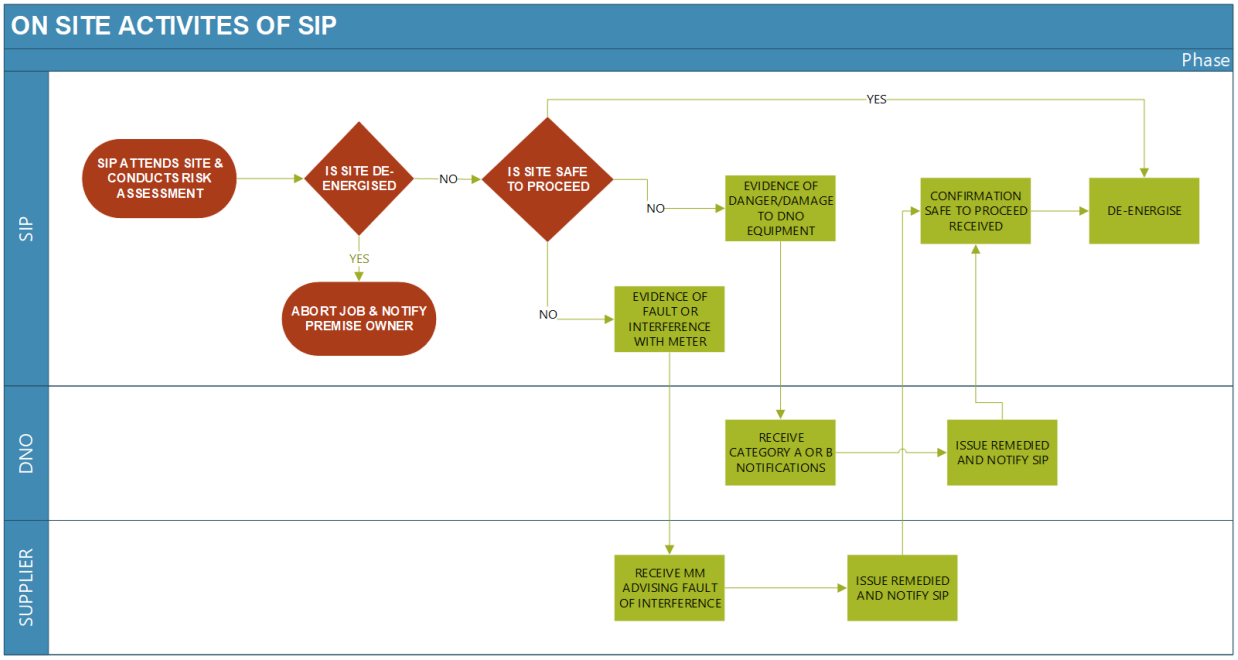
Additional technical questions were raised during the event, which will be addressed outside of this process as they do not relate to the governance of the arrangements.

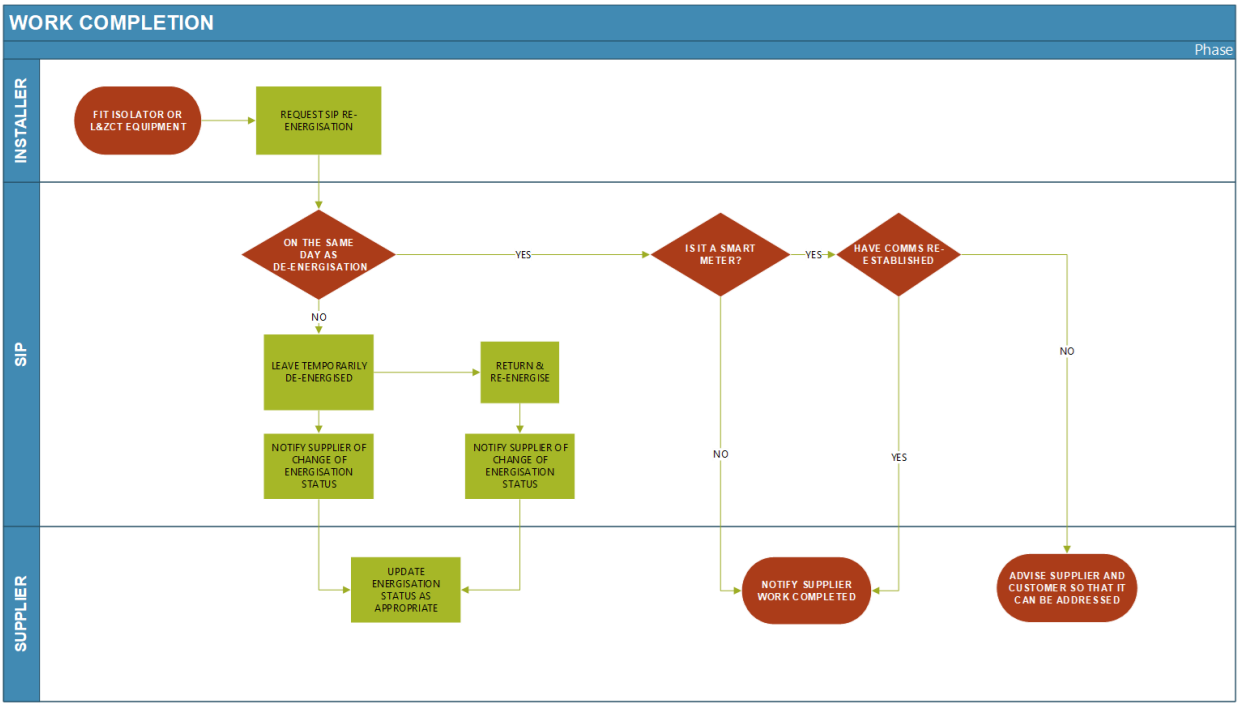
A request was made in respect of the vulnerability data collected by the premise Owner for sharing with the SIP as part of the risk assessment activity. The Suppliers have asked that this information is shared with the Supplier, not as an update to the data, but as an observation so that the Supplier can identify any gaps in their data that need to be addressed. We will include this in a new flow that needs to be added to the solution to provide a record to the Supplier that the SIP has attended the site.

A set of process maps were also prepared to help clarify the roles and responsibilities of each party throughout the process.


Becoming a SIP
REC MEM
DCUSA
REC CODE MANAGER
MEM WISHES TO BECOME A SIP
ADVISED APPLICATION REJECTED
ADVISE MEM NOW ACCEPTED AS A SIP
NO
APPLIES TO DCUSA TO ACCEDE
ACCESSION COMPLETED
YES
RECEIVE CONFIRMATION ACCESSION COMPLETE
UPDATE PARTY REGISTER TO REFLECT NEW ROLE


SIP ENTERS INTO CONTRACT WITH PREMISE OWNER
Phase
PREMISE OWNER
SIP
DNO
PREMISE OWNER WISHES TO CONTRACT WITH SIP
PREMISE OWNER CONFIRMS AND PROVIDES EVIDENCE OF CONSENT & VULNERABILITIES OBTAINED FROM TENANTS
SIP CONFIRMS CONTRACT REQUIREMENTS ON CONSENT & VULNERABILITIES
SIP NOTIFIES PLANNED WORK TO DNO <D-1
DNO RECEIVES NOTIFICATION OF PLANNED WORK


ON SITE ACTIVITES OF SIP
Phase
SIP
DNO
SUPPLIER
SIP ATTENDS SITE & CONDUCTS RISK ASSESSMENT
IS SITE DE-ENERGISED
NO
YES
ABORT JOB & NOTIFY PREMISE OWNER
IS SITE SAFE TO PROCEED
YES
NO
NO
EVIDENCE OF DANGER/DAMAGE TO DNO EQUIPMENT
EVIDENCE OF FAULT OR INTERFERENCE WITH METER
CONFIRMATION SAFE TO PROCEED RECEIVED
DE-ENERGISE
RECEIVE CATEGORY A OR B NOTIFICATIONS
ISSUE REMEDIED AND NOTIFY SIP
RECEIVE MM ADVISING FAULT OF INTERFERENCE
ISSUE REMEDIED AND NOTIFY SIP


WORK COMPLETION
Phase
INSTALLER
SIP
SUPPLIER
FIT ISOLATOR OR L&ZCT EQUIPMENT
REQUEST SIP RE-ENERGISATION
ON THE SAME DAY AS DE-ENERGISATION
YES
NO
IS IT A SMART METER?
YES
HAVE COMMS RE-ESTABLISHED
NO
LEAVE TEMPORARILY DE-ENERGISED
RETURN & RE-ENERGISE
NOTIFY SUPPLIER OF CHANGE OF ENERGISATION STATUS
NOTIFY SUPPLIER OF CHANGE OF ENERGISATION STATUS
NO
YES
UPDATE ENERGISATION STATUS AS APPROPRIATE
NOTIFY SUPPLIER WORK COMPLETED
ADVISE SUPPLIER AND CUSTOMER SO THAT IT CAN BE ADDRESSED

6 DELIVERY AGAINST CHANGE PROPOSAL PLAN

	PLANNED	COMPLETED
PARTY IMPACT ASSESSMENT ISSUED	22/04/2022	17/05/2022
DEADLINE FOR ALTERNATIVE CHAGNE PROPOSAL SUBMISSION	17/05/2022	17/05/2022
PRELIMINARY CHANGE REPORT ISSUED	08/072022	08/07/2022

To allow the feedback on the proposed solution to be reviewed and appropriately considered, the Change Proposal Plan (CPP) was re-baselined. This new CPP included the hosting of the Webinar on 05 July 2022, ahead of the publication of the Preliminary Change Report on 08 July 2022 and a subsequent 15 Working Day Consultation.

A further DCUSA workgroup meeting was held on 9 June 2022, to address some clarifying questions related to the requirements in DCUSA, which affected the solution proposed by the REC. The clarity provided enabled the REC proposed solution and Preliminary Change Report to be finalised.

The work in DCUSA to confirm the cross-code solution is now fully complete and DCUSA has issued a Consultation on their change under their modification rules, which closes on the 18 July.

7 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

7.1 RISKS AND 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.	Closed - The Supplier will receive a new flow to confirm the SIP has attended the site and has de-energised and then re-energised the Metering Point. If the Supply is not re-energised within the same day as de-energisation, the D0139 flow will be sent from the SIP the Supplier.

7.2 ASSUMPTIONS AND DEPENDENCIES

No.	DEPENDENCY	NOTES	STATUS
1	DCUSA DCP394 needs to be approved to allow SIPs to de-energise without	Joint workgroup looking at an end-to-end solution.	Open – DCP394 is In Consultation and will be

No.	DEPENDENCY	NOTES	STATUS
	Supplier Agent involvement		considered by the DCUSA panel in December.
2	The DCUSA Workgroup for DCP394 needs to finalise their requirements before the R0021 solution can be baselined.	A meeting is planned for 9 June 2022.	Closed
3	The Authority will need to make a determination on whether to approve or reject this Change Proposal by 31 December 2022 if this is to be included in the standard REC release on 30 June 2023.	There is a dependency that the Authority make their determination in time for this to be planned into this REC release. In the event a determination is not made by 31 December 2022, this Change Proposal will be implemented in the next standard REC release in November 2023.	Open

8 PROPOSED SOLUTION

The solution has been developed in collaboration with the DCUSA DCP394 Working Group.

8.1 SOLUTION

Conditions Precedent - In order to undertake the activities of a SIP, a REC Accredited MEM must accede to DCUSA, and the REC will require confirmation from DCUSA that this step has been completed.

Premise owners – such as Local Authorities, Housing Associations, Private Landlords or individual homeowners (whether the occupier or not) will be able to contract with the SIP to undertake work directly to facilitate the installation of Isolators or to allow the installation of other equipment in both domestic and non-domestic premises - such as an Electric Vehicle Charging Points, where the SIP will de-energise the supply point and then re-energise it again on completion of this ancillary work.

Scope of the SIP's permitted work – As well as being able to de-energise and re-energise a Supply Point, the SIP will also be permitted to tighten the Meter Tails while on site, and where appropriate, re-making the connection to them to make safe and remedy any disturbance of the connections that may have occurred unintentionally. The SIP must not undertake any other work related to the Supply Point, or otherwise interfere with the Registered Supplier's metering equipment.

Contractual Guidance - When the SIP contracts with Homeowners, the SIP should ensure that the contract between them requires the Homeowners to:

- have given advance notice to any tenants of the impending works, and the homeowners being required to retain evidence of the tenant's consent to the carrying out of the work.
- have identified any customers in a vulnerable situation, where the disconnection of the electricity may put the tenant at risk, and that the homeowners have taken appropriate steps to mitigate this and retain appropriate evidence. The information will be collected by the premise owner and the necessary consent gained to share the data with the SIP and the tenant's Registered Supplier (where relevant); and
- to include a provision that the SIP will only be able to re-energise a Metering Point that has been de-energised by the SIP. Where a Metering Point is found to be de-energised when the SIP attends the site, they must abort the work and may not change the energisation status

Before attending site – the SIP will need to provide the DNO with at least 1 Working Day's notice of the date they intend to carry out the programme of work. This is to ensure that the DNO is aware that if they see clusters of premises or multi-occupancy dwellings going off supply, they will have visibility of the intended work to avoid prompting unnecessary site visits to deal with off-supply issues related to SIP activities. The DCUSA Code Administrator will facilitate the mechanism by which this communication can take place.

On Site - on attending the premises, the SIP will consider whether they are able to undertake the intended work. If they find evidence of damage or interference that will prevent the metering equipment from correctly registering the quantity of electricity supplied, they will promptly inform the DNO and (using their reasonable endeavours to identify the Registered Supplier) notify the Registered Supplier of the same using the relevant communication methods in the table below.

If the identity of the Registered Supplier remains unknown, information related to metering damage or interference will be provided to the United Kingdom Revenue Protection Association (UKRPA) by the SIP.

On carrying out the work, if the metering point remains de-energised for more than the working day in which the de-energisation work was undertaken, the SIP will notify the change in energisation status to the Registered Supplier and the DNO using the relevant Market Messages set out in the table below.

Where a Smart Meter is already installed that has smart communications already enabled, the SIP should check that communications have been restored on completion of the work.

On the Smart Meter communications hub there are five connectivity indicators (SW, WAN, MESH, HAN, GAS). The SIP should check which of these are in use prior to de-energising the meter and check that they are all returned to the same state when re-energising. Any differences identified will be notified to the Supplier on completion of the works if the Communications cannot be re-established. (A photograph or video may prove useful to confirm the pre and post status).

If communication was not re-established, the SIP should inform the Registered Supplier of the same (by telephone) and inform the tenant so that the Registered Supplier may take action to resolve this.

On completion of the work – The SIP will send a Market Message (new) to the Supplier to advise that they have completed Safe Isolation Works. The SIP will include the date of de-

energisation (if on a different date to the re-energisation) and re-energisation date, and any observations that they may wish to make the Supplier aware of, and the Supplier should action any information provided accordingly (for example, instances of vulnerability, or other on-site considerations).

Communication - The SIP will need to have the ability to send communications to the DNO and the Registered Supplier using Market Messages (DTC flows) over the Data Transfer Network. This will require the SIP to be set up as a new Role Code, and for the relevant Market Messages to include new Scenario Variants where the SIP will send and receive information between the SIP and the Registered Supplier and/or the DNO.

Existing processes that require communication outside of the Market Messages – such as phone or email, will use the existing mechanisms and contacts that the SIP uses in their capacity as a REC MEM.

Assurance – the work undertaken by the SIP will be subject to the same performance assurance activities as for their role as REC Accredited MEMs. The Scheme Auditor will include work undertaken as a SIP as part of their regular REC MEM audit activities.

8.2 AN ALTERNATIVE SOLUTION OPTION

An alternative solution that does not change the process or any of the requirements, except in the manner of the communication required between parties (Secure Data Exchange Portal (SDEP) instead of Market Messages) was considered, and during Impact Assessment was discounted as the respondents overwhelmingly supported the use of Market Messages instead of SDEP.

8.3 DETAILED IMAPCTS

A more detailed technical impact of the proposal and details are set out below.

DATA SPECIFICATION	
MM00023 - D0135 - Asset Condition Report	New SV for SIP to SFIC, including a new group/collection allowing or conditional population if it is a SIP.
MM00036 - D0139 - Confirmation or Rejection of Energisation Status Change	(Further Review/Feedback Required) New SVs for SIP to Supplier/MEM/DC, may also need a SIP specific/related enumeration adding for DI50623/J1253 (Failure to Energise or De-Energise Reason Code), DI50016/J0024 (Site Visit Check Code).
MM00001 - D0001 - Request Metering System Investigation	(Further Review/Feedback Required) New SV for SIP to Supplier/MEM, may also need a SIP specific/related enumeration adding for DI50016/J0024 (Site Visit Check Code).
MM00168 - D0005 - Instruction on Action	(Further Review/Feedback Required) New SV for SIP to Supplier/MEM/DC, may also need new group/collections for SIPs, as well as a SIP specific/related enumeration adding for

	DI50005/J0007 (Requested Action Code) linked to the new group/collections.
MM00257 - D0010 - Meter Readings	Possible new SV for SIP to Supplier/Data Collector (DC) (If considered required).
MM00156 - D0268 - Half Hourly Meter Technical Details	Consideration for the need of a SIP specific/related enumeration adding for DI51015/J1689 (Event Indicator) – There is currently no equivalent of this field in the NHH MTDs, however it may be required in the future in view of MHHS.
A New Market Message	Introduction of a new flow to include details of the SIP attending the Site and on which date the site was de-energised, and if not on the same day, the date re-energised. This will include the MPAN, the MPAN address, the SIP ID, and the Supplier ID. It has also been recommended to include any observations that they may wish to make the Supplier aware of, and the Supplier should action any information provided accordingly (for example, instances of vulnerability, or other on-site considerations).

EES Access Changes Required

An acceded MEM only has access to the data related to the Supply Points they are associated to under their commercial relationships with the Registered Supplier. For the SIP to be able to see necessary data to verify the identity of the current Supplier, the SIP will need a community view of a subset of the EES Data. The SIP will need to verify the MPAN and its Address and the identity of the Registered Supplier to allow them to send the required Market Messages.

8.4 TESTING REQUIREMENTS

For the purposes of this change testing will likely be required on the Suppliers and MEMs sides to accommodate Data Specification changes/amendments resulting for the new role creation.

8.5 TRAINING REQUIREMENTS

For the purposes of this change training Supplier and MEMs would need to be briefed and trained in the associated processes. There is also a cross over with the BSC from a DC point of view to advise that actions taken may result in Settlement Exceptions.

8.6 EXTERNAL RESOURCES AND/OR SERVICE PROVIDER DEPENDENCIES

The creation of the SIP role will present the need for REC Service Provider involvement to enable the SIP access to the EES Service.

8.7 ALTERNATIVE APPROACH

An alternative approach was considered by the joint REC/DCUSA Working Group, that would require a single supplier to contract with the Homeowners for this work, and for that supplier's MEM to undertake the work on behalf of all suppliers who were Registered Suppliers to the affected premises. This solution would negate the need to have a MEM independently acceding to DCUSA, as the Suppliers would already have the necessary indemnity arrangements in place with the DNOs.

Initially it was thought that this would allow a faster implementation of the proposal, however, the same barrier exists in terms of the communication requirements. The MEM acting for all Suppliers would have to be able to communicate with all the affected suppliers, and the suppliers would need to know who that the Market Message came, not from their Appointed MEM, but from another MEM acting on the instructions of another supplier under a separate non-energy contract for this specific purpose.

It was felt that this alternative solution would not result in an increase in service providers entering the market, and that this was one of the challenges the proposal sought to overcome. Since the communication issues remain the same for the alternative approach and requires the same resolution as the original proposed, it was decided by the DCUSA workgroup not to progress the alternative approach any further. A Consultation response considered whether this was a viable alternative approach, however, since this has been considered and rejected by the working group, we do not propose to consider this alternative approach any further.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0021can be found here.

10 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	30/06/2023

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

11 CHANGE PATH

CHANGE PATH	AUTHORITY DETERMINED

12 RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

13 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 12 July 2022 to obtain views on the Preliminary Change report Link. In total 17 responses were received. The key themes from these responses have been summarised and set out below.

13.1 SUMMARY OF RESPONSES

13.1.1 THE SOLUTION

The introduction of a new Market Message

Respondents differed on their support for the introduction of a new Market Message. The majority of respondents were supportive of the proposed new Market Message, whilst others would like to see existing processes that a MEM would use extended to cover the SIP activity.

Inclusion of Vulnerability or other site characteristics

The question of whether information on vulnerability or other characteristics should be fed back to the supplier was considered. Some parties felt that this shouldn't be transferred, and raised concerns about consent, where others noted that safety concerns should be reported to the DNO and the Supplier. This is a requirement of the solution and therefore no changes are proposed.

13.1.2 BENEFITS RELATIVE TO IMPLEMENTATION AND OPERATIONAL COSTS

Only one respondent provided any indicative costs during the Impact Assessment stage for implementing the changes, and only two other respondents provided additional cost information during the Consultation stage.

13.1.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

Respondents supported the Code Manager's Recommendation and Case for Change. It was noted that this would extend competition in service provision and ensure that there was a solution that allowed parties to do this work safely and with qualified providers, with the necessary permissions in place, as opposed to currently where it was noted that there is a lot of work being done without the necessary permissions in place and where no assurance activites are completed.

13.1.4 IMPLEMENTATION APPROACH AND DATE

Of the 17 respondents, Two suggested an earlier implementation date would be desirable, particularly given that work is being undertaken without permission, putting others and themselves at risk, as well as danger, damage or interference going un-reported. One respondent indicated they would need nine months; the remainder were happy with the proposed implementation date. No concerns were raised on the implementation approach.

14 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

DOCUMENT	SECTION	AMENDMENT	REASON
PCR	8.3	Removal of the section related to EES Access Changes required	Our initial understanding was the MEMs only had a portfolio view of the data in EES relative to the Supply Points they are Appointed to by their Supplier. On further assessment of the Data Access Matrix and confirmation with the Service Provider, it has been confirmed that the MEMs access does extend to a Community View and therefore no changes are required.

15 BUSINESS CASE ASSESSMENT

15.1 COST BENEFIT ANALYSIS

COSTS	DESIGN/ DEVELOPMENT COSTS	IMPLEMENTATION COSTS	ONGOING OPERATIONAL COSTS
DNO	£5000	£5000	£1000 PER ANNUM
DNO		£10,000	
SUPPLIER		<£100,000	

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
IMPROVED CUSTOMER EXPERIENCE	Currently premise owners who are not occupiers have difficulty in procuring the Isolation Installation by the property's Registered Supplier (if they are able to identify the responsible party). Suppliers have cited GDPR as one concern as to why they will not engage. This change removes the need to approach the supplier.
IMPROVED SERVICE FOR PREMISE OWNERS	Currently, if a Registered Supplier makes an appointment with their appointed MEM, should the MEM fail to attend the site, then the Supplier is responsible for payment of compensation to the Consumer. However, when the work is booked at the request of the premise owner (landlord), no compensation is payable to the person

	who has received poor service. Under these arrangements, the Landlord will be able to put in place commercial arrangements regarding service provision failures.
REC ACCREDITED MEMS	This will open up the market for MEMs to apply to become SIPs. They may then accede to DCUSA and once that process is complete, they are free to enter into commercial arrangements to install Isolators for premise owners.
REGISTERED SUPPLIERS	When Accredited MEMs accede to DCUSA, the concerns around liabilities are set out in the DCUSA.
COMPLIANCE	The solution will make it easier for premise owners to contract with providers who can offer an industry compliant solution, which removes the risk of work being undertaken by non-qualified organisations, as is widely happening at the moment.

15.2 COST BENEFIT ANALYSIS SUMMARY

Very little cost information was provided during the development of this Change Proposal, and therefore it is difficult to make an assessment of the costs and how they weigh against the benefits.

Many of the benefits of this change are not quantifiable in terms of cost, however, the National Association of Professional Inspectors and Testers have produced a report following a survey with 620 of their Registered members, specifically on the issues which this modification seeks to address and which provided some interesting insights. A copy of the report can be accessed here. Their report concluded that there is confusion, with incorrect advice being given – contrary to regulations, and that contact with suppliers did not always prove successful.

The Code Manager believes that this Change Proposal will provide access to a safe service, which is provided by qualified operatives who are subject to audit and assurance regimes.

The service can be used by the owner of any premise type – be they domestic or non-domestic, as the increasing demand for installation of Low & Zero Carbon Technology and Electric Vehicle Charging Points is creating an increased demand, which is currently being met by providers who are not qualified or assured. Suppliers are heavily focused on the roll out of Smart Meters and so are not always able to divert resources to meet this need, particularly when the demand is not coming directly from their contracted consumers. By opening the market up to allow others to fill this much needed gap, it will ensure that isolations are carried out safely, and premise owners have a permission based solution that addresses safety and enables them to have the work carried out in a timeframe that aligns with their programmes of work.

15.3 CASE FOR CHANGE

The Code Manager believes that R0021 better facilitates the following REC Objectives:

OBJECTIVE	IMPACT DESCRIPTION	IMPACT TYPE	JUSTIFICATION
To ensure the REC operates and evolves in a manner that facilitates the achievement of its mission statement	This will provide multiple benefits, not just to premise owners and their tenants, but it will ensure Supplier and DNO resources are able to concentrate on the Smart Meter roll out activities and for DNOs in meeting the Low Carbon Network requirements, It is promoting innovation, competition and positive customer outcomes	Positive	This solution opens up access to services provided by suitably qualified and assured REC Parties to premise owners (who are not the customer of the Energy Supplier) that will enable the installation of L&ZCT equipment by premise owners for the benefit of their tenants. It will enable premise owners to safely install isolators in accordance with the market regulations, and by increasing the role of MEMs to become SIPs, it will increase competition in services available to the market,
To ensure customers interests and data is protected in the operation of the REC	Some Customer Vulnerability data will be collected as part of this process.	Positive	By requiring the premise owner to collect and share the vulnerability data with both the SIP for Risk Assessment Purposes and with the Registered Supplier, it will enable Suppliers to improve their confidence in the data they hold for these Consumers in respect to any special needs.
To drive continuous improvements and efficiencies in the operation of the REC and the central systems and communication infrastructures it governs	The introducing a new flow and amending existing flows to create a role for the SIP to send information to Suppliers and DNOs	Positive	By using Market Messages and making changes to the EES access arrangements for the SIP, it will ensure that information is safely exchanged.

The solution provides an alternative, efficient mechanism for premise owners to facilitate the installation of L&ZCT equipment in their premises (both domestic and non-domestic) and

provides a solution for housing associations, local authorities, and private landlords to contract directly with service providers to enable refurbishment programmes to go ahead without needing to co-ordinate with multiple Suppliers and their MEMs.

16 CODE MANAGER'S RECOMMENDATION

Based on the assessment in section 13 and 15 of this report, the Code Manager considers the REC Objectives would be better facilitated by the implementation of this Change Proposal.

The Code Manager recommends that the Metering Expert Panel recommends the Authority:

- **Approves** the proposed change solution.
- **Approves** the proposed implementation approach.
- **Approves** the proposed implementation date of 30 June 2023

17 RESPONSIBLE COMMITTEE

On the 14th September, the Metering Expert Panel voted to recommend that the Authority

- **Approves** the proposed change solution.
- **Approves** the proposed implementation approach.
- **Approves** the proposed implementation date of 30 June 2023

18 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
CONSOLIDATED CONSULTATION COMMENTS AND CODE MANAGER'S RESPONSES	Link
ANY OTHER DOCUMENTS / LINKS	NAPIT