RETAIL ENERGY CODE

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

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

INITIAL ASSESSMENT 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	1.0
DATE ISSUED	21/01/2022
DOCUMENT APPROVAL STATUS	APPROVED BY REC CHANGE PANEL
RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

CHANGE OVERVIEW

This Change Proposal is to allow REC accredited Metering Equipment Managers (MEMs) to be permitted to de-energise and re-energise the electricity supply at the request of the property owner or occupier rather than through the Registered Supplier's MEM. This could be to facilitate the installation of generation equipment or other equipment such as Electric Vehicle Charging Points that facilitate a zero-carbon future.

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

RETAIL ENERGY CODE

CONTENTS

1.	SUMMARY	3
2.	PROBLEM STATEMENT	3
3.	USER STORIES	3
4.	IMPACTS	4
5.	CHANGE PATH AND RESPONSIBLE COMMITTEE	5
6.	PRIORITY STATUS AND URGENCY	6
7.	SUMMARY OF CHANGE PROPOSAL PLAN	7
8.	GLOSSARY	8

LEAD ANALYST
Colette Baldwin
EMAIL

TECHNICAL LEAD
Beth Brown
EMAIL

ASSURANCE LEAD
Eliana Campbell
EMAIL

RETAIL ENERGY CODE

1 SUMMARY

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.

2 PROBLEM STATEMENT

It is difficult for landlords of local authority, private or social housing developments 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 DNO is permitted to undertake the work.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As a property owner or occupier I want to be to arrange for the installation of equipment for the use of 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.
M3	As the Registered Supplier, I want to know what steps the SIP who attends the site and finds the site in an unsafe situation to re-energise, will take 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.

4 IMPACTS

REC PARTIES AND SERVICE USERS
Metering Equipment Managers (MEM)
Distribution Network Operators (DNO)
Electricity Suppliers

CONSUMERS
Electricity Consumers

REC DOCUMENTS / PRODUCTS
Metering Operations Schedule (Schedule 14)
Meter Operator Code of Practice (MOCoP)
REC Schedule 1 – Interpretation & Definitions

RECC AND REC CODE MANAGER
Code Manager

The full Impact Assessment will validate all the impacts and impacted parties during the Solution Development phase of this change, once the solution and legal text have been defined.

The Code Manager will need to review the Accreditation process in light of this new type of MEM and consider a new definition of a SIP undertaking de-energisation and re-energisation work.

We will need to consider whether their role as a SIP introduces additional risks that will need to be considered by the REC Performance Assurance Board (REC PAB). They should ascertain whether they need any additional assurance, compliance or audit requirements to be introduced to mitigate any risk introduced if this Change Proposal is approved.

Where the work is instigated by the landlord, the solution will need to consider how affected householders of occupied tenanted premises may need to have access to any Priority Service special needs information, (as the Landlord may be unaware of those needs) and how the MEMs can have access to the relevant information in advance of carrying out the work (such as applicable special needs categories, and details of the Registered Supplier and potentially their appointed MEM.

General Data Protection Regulations (GDPR) impacts and consents will of course need to be considered as part of the solution.

The development of the solution will need to understand the SIP's responsibility to report any evidence of meter tampering and/or to notify the Registered Supplier/DNO of any unsafe situations that go beyond the remit of the work they are contracted to undertake. This will include the SIP communicating with the Registered Supplier and/or DNO and may also require the SIP to communicate information about leaving a site de-energised where the site has been left de-energised for safety reasons.

Where a Smart meter has been de-energised and re-energised, but the Smart meter communications fail to re-establish, the SIP carrying out work will be required to inform the Registered Supplier and advise them to investigate, and if necessary, send their own appointed MEM to fix any fault.

The development of the solution will determine how these communications will be achieved and whether it is possible to use existing Energy Market Messages or the Secure Data Exchange Portal (SDEP) to send information to the Registered Supplier and or DNOs and whether the approach used by MEMs to communicate with the DNO or Registered Supplier through dedicated points of contact (such as those used for MEM to DNO notifications related to danger, damage or interference with equipment) identifying who or what are the appropriate points of contact for such messages from SIPs to the Registered Supplier.

The solution should also consider whether there is a need to clarify the scope of eligible activities SIP will be permitted to undertake and whether this should be defined and set out in the REC.

4.1 CROSS CODE IMPACTS

The Cross Code Steering Group has reviewed the Change Proposal and the outcomes of that review are detailed below. The changes required to the REC mean that for this Change Proposal the REC should be considered the Lead Code, and we have agreed to co-ordinate the progression of this change with DCP394.

Smart Energy Code (SEC) - The SEC have considered the proposal and have raised a concern about what would happen if, on completion of the work, the Communications failed to re-establish a connection, and so the Smart Meter, Communications Hub and/or other devices connected to the Home Area Network (HAN) did not return to their pre-interrupted operating state.

The SEC would expect the SIP carrying out work to inform the Registered Supplier and advise them to investigate, and if necessary, fix any fault, given the SIP does not have permission to go beyond the de-energisation and re-energisation activities.

The Distribution Connection & Use of System Agreement (DCUSA) - MEMs wishing to undertake this type of work will have to accede in part to the DCUSA, and an appropriate agreement is being developed which will permit a limited relationship between the DNOs and the MEMs wishing to undertake this activity.

Balancing & Settlement Code (BSC) – There are no cross-code impacts identified at this stage, however, this will be validated as part of the Impact Assessment.

5 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	AUTHORITY APPROVAL
RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

As this REC Change Proposal creates a new role under the REC for a SIP and it is likely to have a positive impact on Consumers (by enabling an innovative approach to installing Electric Vehicle Charging Points and other technology in a more co-ordinated and efficient way), and by increasing the pool of metering equipment managers who can de-energise and re-energise a metering point. The Change Path for this Proposal requires the consent of Authority rather than being a self-governance matter. It should be noted that the DCUSA Change Proposal is a Part 1 Change Proposal which will also require the consent of the Authority.

As the REC is the Lead Code for this Change Proposal, it is important that both the REC change and the DCUSA change are submitted for industry consultation at the same time, and that both proposals are submitted to the Authority for their joint consideration.

This Change Proposal impacts both the Metering Operations Schedule and the Metering Operations Code of Practice, the change control for both of which are the responsibility of the Metering Expert Panel, it will also introduce a new role for already accredited REC MEMs (a SIP), so a change to REC Schedule 1 – Interpretations and Definitions will be necessary.

6 PRIORITY STATUS AND URGENCY

PRIORITY STATUS	MEDIUM
URGENCY	STANDARD

RETAIL ENERGY CODE

PRIORITISATION MATRIX

Significance	Score	Weighting
Legal/Regulatory Compliance	1	30
Strategic Direction	1	20
Cost Benefits / Value	1	10
Consumer Impacts	2	30
Operational Efficiency	1	10

Urgency

3	N/A	13	23	33
2	02	12	22	32
1	01	11	21	31
0	00	10	20	N/A

Significance

Weighted Significance Score	1
Urgency	1
Overall Priority Score	**11**

Effort	1 - Moderate

Priority Score	Priority Status
23 - 33	Critical
13 - 22	High
11 - 21	Medium
00 - 10	Low

PRIORITY STATUS
Medium

This change is considered 'Medium' priority based on a significance score of 1 and an urgency score of 1.

The significance score has been determined against the following criteria:

- Legal/Regulatory Compliance – A score of 1 because this change will facilitate Metering Points being safely de-energised and re-energised by a SIP, but with the appropriate governance and oversight in place to ensure the work is done in accordance with Legal/Regulatory Compliance requirements.

- Strategic Direction – A score of 1 because this change facilitates the implementation of the REC Strategy and Strategic aim to develop and/or maintain effective, innovative and positive consumer-facing solutions; in respect of Electric Vehicle Charging, as it will improve the efficient installation of EVC Points.
- Consumer Impacts – A score of 2 because this change will improve the customer experience, by ensuring the installation of generation equipment or EVC equipment is completed in a single stage with work being co-ordinated by the Landlord using appropriately authorised parties to complete the installation.
- Cost Benefits/Value – A score of 0 because there are no cost benefits identified to Consumers, REC Parties, or RECCo.
- Operational Efficiency – A score of 2 as this change will allow a more efficient approach to be taken to working safety on a large portfolio of properties rather than requiring each Energy Suppler and their MEM to attempt to co-ordinate with the property owner.

Urgency – A score of 1 as this change needs to be progressed with a timetable to achieve or align with the DCUSA Change Proposal DCP394 and must be progressed in the next 6 months to achieve this.

Effort – A score of Moderate as the this Change Proposal requires further development of the solutions and co-ordination with the DCUSA Change Proposal to ensure there is an effective end-to-end solution.

7 SUMMARY OF CHANGE PROPOSAL PLAN

This change proposal has a cross-code impact and therefore consultation on the DCUSA and REC change proposals will be co-ordinated and aligned.

	FROM	TO
SOLUTION DEVELOPMENT	03/02/2022	19/04/2022
PARTY IMPACT ASSESSMENT ISSUED	22/04/2022	17/05/2022
DEADLINE FOR ALTERNATIVE CHANGE PROPOSAL SUBMISSION	27/05/2022	27/05/2022
PRELIMINARY CHANGE REPORT ISSUED	27/05/0222	27/05/2022
CONSULTATION ISSUED	10/06/2022	01/07/2022
FINAL CHANGE REPORT ISSUED	04/07/2022	04/07/2022
RESPONSIBLE COMMITTEE DECISION	19/07/2022	19/07/2022
APPEAL WINDOW CLOSURE	04/08/2022	04/08/2022

RETAIL ENERGY CODE

8 GLOSSARY

TERM	DEFINITION
Metering Equipment Manager (MEM)	means, as applicable, either: (a) for electricity, the Meter Operator Agent (as defined in the BSC) Appointed by an Electricity Supplier; or (b) for gas, the Meter Asset Manager (as defined in the UNC) Appointed by the Gas Supplier.
Safe Isolator Provider (SIP)	A REC Accredited MEM who can undertake a limited range of activities, including de-energising and re-energising a site on the instructions of a property owner and not the Registered Supplier.
Registered Supplier	means, in respect of an RMP and at any time, the Energy Supplier recorded against that RMP in the relevant Switching Data Service at that time with an active registration status (or, in respect of a period of time, the Energy Supplier that had, has or will have an active registration status in respect of that RMP during that period).
REC Accreditation	means the process by which a Metering Equipment Manager is recognised as fulfilling the requirements of one or more Metering Codes of Practice, which may include an audit process in accordance with the Metering Accreditation Schedule. "Accredited", “Approved” and similar expressions shall be interpreted accordingly.
REC Performance Assurance board (REC PAB)	means the performance assurance board for this Code, as from time to time established under Clause 15 of the main body of this Code (which is a Sub-Committee).
Priority Services	is to be interpreted by reference to the licence obligations of the relevant Party, and therefore has the meaning given in: a. Electricity Supply Licence Condition 26; b. Gas Supply Licence Condition 26; c. Electricity Distribution Licence Condition 10; and d. Gas Transporters Licence Condition 17.
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Distribution Connection and Use of System Agreement (DCUSA)	means the agreement of that name maintained pursuant to the Electricity Distribution Licences.
Energy Market Messages	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
Responsible Committee	is described in Paragraph 2.2 of the Change Management Schedule. (Sub-committee means a sub-committee of the REC Board established from time to time in accordance with Clause 5 of the main body of this Code).