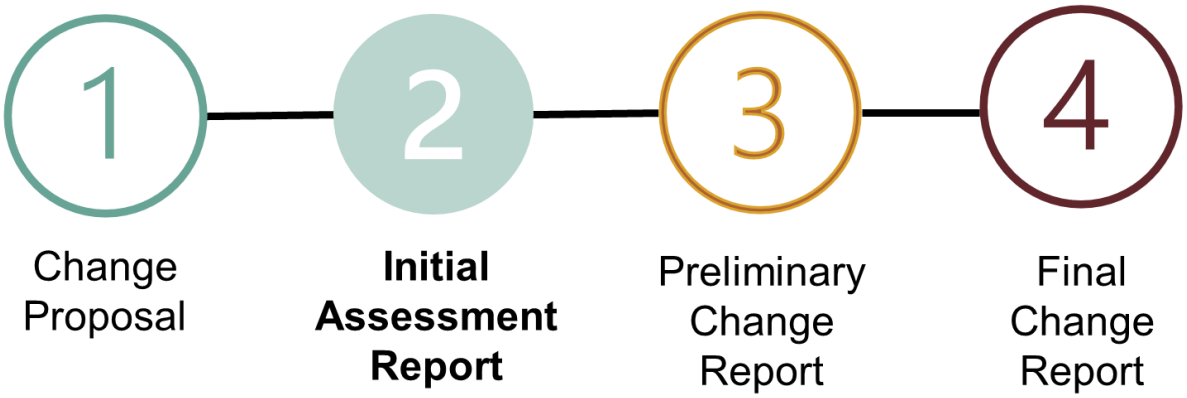
RETAIL ENERGY CODE

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

INITIAL ASSESSMENT REPORT



PURPOSE:	This is a written report from the Code Manager setting out their initial assessment of the Change Proposal and planned next steps for progressing the proposal.
NOTES:	The Initial Assessment Report is accompanied by a Change Proposal Plan, which describes the Code Manager's plan for progressing this Change Proposal. The solution will not be finalised until the publication of the Preliminary Change Report.
NEXT STEPS:	The Change Proposal Plan will set out the next steps for progressing this Change Proposal. The Code Manager will either propose additional activities to develop and/or assess the solution, or immediately prepare and publish the Preliminary Change Report.

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

INITIAL ASSESSMENT REPORT

R0026 – WHOLE CURRENT (WC) / CURRENT TRANSFORMER (CT) CERTIFICATES

DOCUMENT VERSION	1.0
DATE ISSUED	04/02/2022
DOCUMENT APPROVAL STATUS	APPROVED BY REC CHANGE PANEL

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

CHANGE OVERVIEW

Metering Equipment Managers (MEMs) can currently work on Whole Current (WC) or Current Transformer (CT) meters without having been previously assessed on that metering category. This Change Proposal seeks to develop and implement a solution to address this area of risk.

	High Impact: N/A
	Medium Impact: Metering Equipment Managers
	Low Impact: Metering Scheme Auditors.

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1 SUMMARY

Metering Equipment Managers (MEM) are audited upon accreditation and then annually under the Retail Energy Code (REC) to ensure they are compliant with the Meter Operation Code of Practice (MOCoP). The audits conducted can be on either Whole Current (WC) or Current Transformer (CT) meters depending on how many Meter Operatives they have employed that are trained to work on those meter categories.

If at the time of accreditation, a MEM was only assessed on WC or CT meters, they can currently begin to work on the other metering category for the first time without being assessed on their competency until the next audit cycle.

This issue was initially raised under the Meter Operators Code of Practice Agreement (MOCoPA) prior to transition to the REC, with separate accreditation and certification for WC and CT metering proposed as a potential solution. Through the progression of this Change Proposal, all solution options will be explored to ensure the most appropriate solution is taken forward.

2 PROBLEM STATEMENT

Current metering accreditation arrangements allow MEMs to work on whole current or Current Transformer (CT) meters regardless of whether they have previously or recently been assessed on that metering category. This poses potential risks for the safety of Consumers and Meter Operatives as the MEMs may not have appropriate processes or training in place to ensure compliance with the MOCoP.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As an Electricity Consumer I want to be confident that the Meter Operative that completes work on my Metering Equipment is competent to ensure my supply is safe, secure and uninterrupted.
MARKET PARTICIPANT USER STORIES	
M1	As a MEM, I want to be confident that my processes and Meter Operatives are compliant with the MOCoP, to ensure minimal disruption to my clients and the safety of my employees.
M2	As an Electricity Supplier, I want to be confident that my Appointed agents are compliant with the MOCoP to ensure my consumers safety.

4 IMPACTS

REC PARTIES AND SERVICE USERS
Metering Equipment Managers

REC SERVICE PROVIDERS
Metering Scheme Auditors

CONSUMERS
Electricity Consumers

REC DOCUMENTS / PRODUCTS
Metering Accreditation Schemes Schedule
Meter Operation Code of Practice (MOCoP)
Qualification and Maintenance Schedule

RECCO AND REC CODE MANAGER
REC Code Manager

The impacts identified are based on the proposed potential solution, however the impacts of all potential solutions will be re-assessed through the analysis and solution development phase.

Metering Scheme Auditors may be impacted by a solution for this Change Proposal as depending on the solution preferred, there may be the introduction of ad-hoc site audits or an increase in the volume of site audits conducted.

4.1 CROSS CODE IMPACTS

No cross-code impacts have been identified.

5 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	SELF-GOVERNANCE
RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

The Metering Expert Panel (MEP) has been identified as the Responsible Committee as they are responsible for the change control on the MOCoP, and the Metering Accreditation schedule which are two of the documents identified as potentially being impacted.

However, this decision will be reviewed during Solution Development depending on the proposed changes to other documents, such as the Qualification and Maintenance Schedule, which is the under the change control of the Performance Assurance Board.

6 PRIORITY STATUS AND URGENCY

PRIORITY STATUS	LOW

URGENCY	STANDARD

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PRIORITISATION MATRIX

Significance	Score	Weighting
Legal/Regulatory Compliance	1	30
Strategic Direction	0	20
Cost Benefits / Value	0	10
Consumer Impacts	2	30
Operational Efficiency	0	10

Weighted Significance Score	1
Urgency	0
Overall Priority Score	**10**

Effort	1 - Moderate

Urgency

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

Significance

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

PRIORITY STATUS
Low

Significance - The significance score has been determined against the following criteria:

- Legal/Regulatory Compliance – A score of 1 because this change aims to increase assurance with MOCoP and prevent risks to Consumer and Meter Operative safety which could positively impact compliance with wider Health and Safety legislation.
- Strategic Direction – A score of 0 because this change has no impact on current industry strategic aims.
- Consumer Impacts – A score of 2 because this change will reduce potential risks to Consumer safety and supply interruption because of unassessed Meter Operatives conducting work at their Premises.
- Cost Benefits/Value – A score of 0 because there are no cost/benefits/value identified to Consumers, REC Parties, or RECCo,
- Operational Efficiency – A score of 0 as there is no increased efficiency identified to REC Parties or the Code Manager because of this change

Urgency – A score of 0 as there are no urgent requirements to implement this change.

Effort – A score of 1 as the this is a standard change with solution development and impact assessment required.

This change is considered low priority based on a significance score of 1 and an urgency score of 0.

7 SUMMARY OF CHANGE PROPOSAL PLAN

This Change Proposal requires analysis and solution development phases to explore solutions to address the problem statement before Impact Assessments by REC Parties and Metering Scheme Auditors are carried out.

The Change Proposal Plan incorporates time for solution refinement following the Impact Assessments. Where possible, timelines will be reduced as the Change Proposal progresses through the change process.

	FROM	TO
SOLUTION ANALYSIS AND DEVLOPMENT	16/02/2022	21/04/2022
IMPACT ASSESSMENT PERIOD	22/04/2022	16/05/2022
DEADLINE FOR ALTERNATIVE CHANGE PROPOSAL SUBMISSION	01/07/2022	01/07/2022
PRELIMINARY CHANGE REPORT ISSUED	01/07/2022	01/07/2022
METERING EXPERT PANEL REVIEW	13/07/2022	13/07/2022

8 GLOSSARY

TERM	DEFINITION
Appointed	means, in respect of a Supplier Agent and for a particular RMP, that the Supplier Agent is recorded against that RMP under this Code (or the BSC or UNC, as applicable); or, in respect of a period of time, that the Supplier Agent is or was so recorded during that period. "Appoint" and "Appointment" shall be interpreted accordingly.
Consumer	means any person supplied (or seeking a supply) of Energy at an RMP (whether or not that person also exports or is seeking to export electricity at an RMP).
Electricity Supplier	means a person holding an Electricity Supply Licence.
Meter Operative	means an employee, agent or subcontractor appointed by the MEM.
Metering Accreditation Schemes Schedule	means REC Schedule 15
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.
Metering Operation Code of Practice (MOCoP)	means the Meter Operator Code of Practice, against which relevant MEMs are assessed pursuant to the Metering Accreditation Schedule.

Premises	is to be interpreted in accordance with the Gas Act and the Electricity Act.
Qualification and Maintenance Schedule	means REC Schedule 9.
Retail Energy Code (REC)	means this Code, including its Schedules and the Technical Specification, maintained pursuant to the electricity supply licences granted under the Electricity Act 1989 and the gas supply licences granted under the Gas Act 1986, as such code is modified from time to time in accordance with its provisions
Site	unless stated otherwise means the area around which the Metering Point is located, in respect of the relevant meter(s) in relation to which a MEM has been appointed to perform meter operation services.