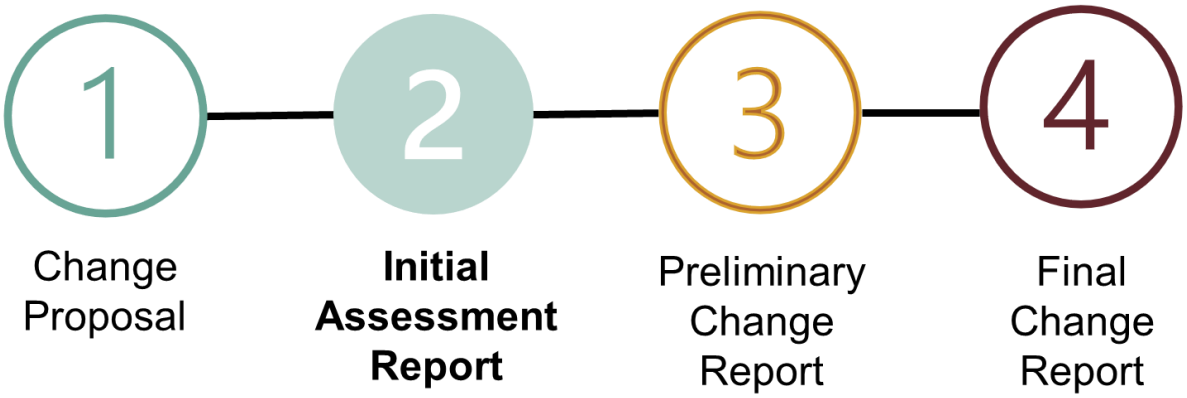
RETAIL ENERGY CODE

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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

R0027 – MINIMUM IDENTIFICATION REQUIREMENTS IN THE METER OPERATION CODE OF PRACTICE

DOCUMENT VERSION	1.0
DATE ISSUED	04/02/2022
DOCUMENT APPROVAL STATUS	NOT YET APPROVED BY REC CHANGE PANEL

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

CHANGE OVERVIEW

This Change Proposal proposes to implement minimum requirements for identity cards within the Meter Operation Code of Practice (MOCoP), to provide greater clarity for Metering Scheme Auditors and Consumers when verifying the Competent Persons identity.

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

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LEAD ANALYST
Courtney Campbellwood
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1 SUMMARY

Metering Scheme Auditors, appointed under the Meter Operators Code of Practice Agreement (MOCoPA) have previously been presented with identity cards that may not have sufficiently confirmed the identity of the Competent Persons they were auditing. Issues identified included illegibility, the card being expired and if the Meter Operative is a sub-contractor, the incorrect MOCoPA Operator named on the card.

Consumers may have concerns about their safety if the identity cards they are presented with do not enable the Consumer to verify the Operative's identity. For example, if there is no photograph, or the photograph is unclear on the identity card, an unauthorised person could use that card to gain access to a Consumer's Premises. Consumers may refuse entry to their Premises if they are not satisfied with the identity card they have been shown which could prevent or delay work being completed.

Paragraph 4.2 of The Meter Operation Code of Practice (MOCoP) states that the Meter Operatives should have satisfactory evidence of proof of identity, however, it provides no further clarity on what this should look like. There is precedence under the Retail Energy Code (REC) for the inclusion of further detail in relation to identity cards.

Paragraph 6.1.3 of The Gas Meter Code of Practice (MCoP) states 'Metering Equipment Manager and Approved Meter Installer operatives must carry a valid identity card which shall include a photograph.

The Smart Meter Installation Schedule requires the Installer to present a valid identity card which clearly displays the Installer's name, photograph, the Electricity Supplier's (or the Electricity Supplier's contractors) name and contact telephone number.

2 PROBLEM STATEMENT

Identify card inconsistencies can result in Metering Scheme Auditors and Consumers not being able to reliably verify a Meter Operative's identity. If Consumers and Metering Scheme Auditors are unable to verify the Competent Person's identity there could be delays to audits being completed, on-site work being carried out, safety risks or a reduction in consumer trust and confidence.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As an electricity Consumer I want to be able to verify the attending agent's identity so I can feel safe at my Premises whilst work is completed and trust the Energy industry to care about my safety.
C2	As an electricity Consumer I want to be able to verify the attending agent's identity so that work can be completed efficiently, without delay or confusion.
MARKET PARTICIPANT USER STORIES	

M1	As an Electricity Supplier I want my Appointed Metering Equipment Manager to be identifiable when attending Consumer Sites to retain Consumer confidence, trust and for works to be completed without delay.
M2	As a Metering Equipment Manager, I want clarity around the requirements regarding identity cards to be clear so that I can assure compliance and easily identify myself to consumers at site.
M3	As a Metering Scheme Auditor, I want clarity on appropriate identity requirements so I can confidently validate a Metering Equipment Manager's identity during a site audit.

4 IMPACTS

REC PARTIES AND SERVICE USERS
Metering Equipment Managers
Electricity Suppliers
Distribution Network Operators

REC SERVICE PROVIDERS
Metering Scheme Auditors

CONSUMERS
Consumers

REC DOCUMENTS / PRODUCTS
Meter Operator Code of Practice
Gas Metering Code of Practice (MCoP)
Smart Meter Installation Schedule

RECCO AND REC CODE MANAGER
REC Code Manager

Although this Change Proposal was raised to consider the identify card requirements under MOCOP, during the solution development stage the identity requirements for the Smart Meter Installation Schedule and MCoP will also be reviewed and consistency across the REC considered.

We do not anticipate any changes required to MCoP as Meter Operatives under this code of practice will hold Gas Safe Register identity cards which are considered sufficient in confirming the Meter Operatives identity.

Dependent on the solution defined, there may be impacts to the Code Manager processes such as the Business Solution Assessment (BSA) stage of market entry or HQ audits.

4.1 CROSS CODE IMPACTS

This change does not have any cross-code impacts.

5 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	SELF-GOVERNANCE
RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

This Change Proposal impacts the Metering Operations Code of Practice, the change control for which is the responsibility of the Metering Expert Panel (MEP), therefore we propose the Responsible Committee for this change should be the MEP.

However, this decision will be reviewed during Solution Development depending on the proposed changes to the Smart Meter Installation Schedule which is a Category 1 document and under the change control of the Change Panel.

6 PRIORITY STATUS AND URGENCY

PRIORITY STATUS	LOW
URGENCY	STANDARD

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	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	0
Overall Priority Score	10
Effort	1 - Moderate

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 as Electricity Suppliers and Distribution Network Operator's representatives should be identifiable as a representative of the

Licensee under the Electricity Supply Standard Licence conditions and the Electricity Distribution Standard Licence Conditions.

- Strategic Direction – A score of 0 because this change has no impact on current industry strategic aims.
- Cost Benefits/Value – A score of 0 because there are no cost/benefits/value identified to Consumers, REC Parties, or RECCo
- Consumer Impacts – A score of 2 as the safety risks of unauthorised persons entering a Consumer's Premises are serious as well as potential delays of works being completed should entry be refused.
- Operational Efficiency – A score of 1 as increased clarity on requirements for identity cards will increase efficiency in the audit process but could also prevent potential delays in works being completed if the Consumer is unable to verify the identity of the agent and refuses them entry to their Premises.

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

Urgency – a score of 0 since there are no urgent requirements to implement the change.

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. The plan for consultation will be detailed in the Preliminary Change Report when this is issued.

	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

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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.
Authorised Person	means, in respect of each REC Service User, one of its employees, agents, consultants or contractors.
Code of Practice for Gas Metering Equipment Managers and Approved Meter Installers (MCoP)	means the Metering Code of Practice against which gas MEMs and Meter Installers are assessed, pursuant to the Metering Accreditation Schedule.
Meter Installer	means a Metering Equipment Manager that is approved (or which is seeking approval) as a Meter Installer under the Metering Accreditation Schemes Schedule. “Approved Meter Installer” and “AMI” shall be construed accordingly.
Competent Person	for the purpose of any of the Metering Codes of Practice, means an individual having the appropriate training, assessment, and certification to supervise or carry out the “work” being undertaken in a safe and proper manner.
Consumer	means any person supplied (or seeking a supply) of Energy at an Registrable Measurement Point (whether or not that person also exports or is seeking to export electricity at an Registrable Measurement Point).
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
DNO Operative	means an employee, agent or Sub-contractor appointed by the DNO who performs the functions of the DNO.
Electricity Supplier	means a person holding an Electricity Supply Licence.
Energy	means gas and/or electricity.
Gas Safe Register	means the register of Gas Engineers maintained by Gas Safe. “Gas Safe Registered” and “Gas Safe Registered Engineer”, “Gas Safe Registration” and cognate expressions shall be construed accordingly.
Meter Operative	means an employee, agent or subcontractor appointed by the MEM.
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.
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.
Smart Meter Installation Schedule	means REC Schedule 16