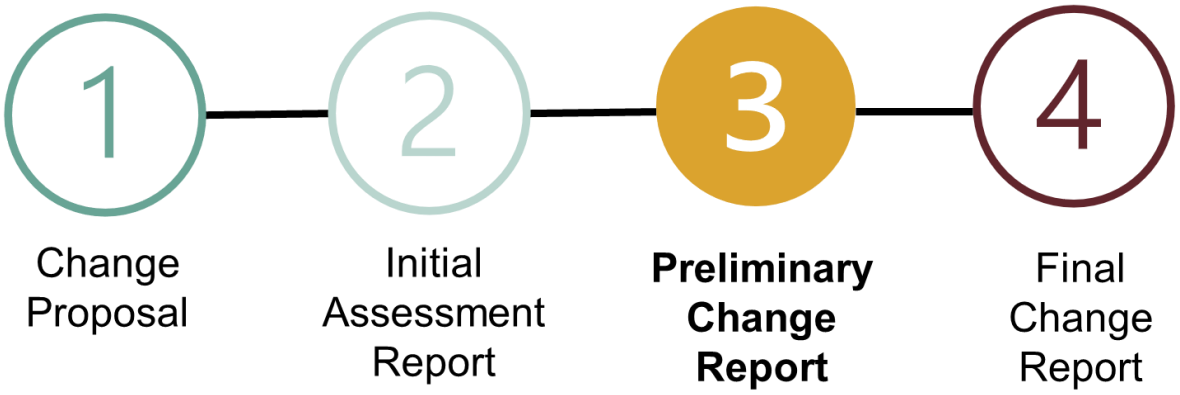
RETAIL ENERGY CODE

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PRELIMINARY CHANGE REPORT



PURPOSE:	The Preliminary Change Report is drafted by the Code Manager when a Change Proposal has a fully formed solution that has been sufficiently assessed to allow a decision to be made on whether this should be approved for implementation. The report includes a summary of the Change Proposal, details of the proposed solution and the Code Manager's view on the case for change and recommendation.
NOTES:	The report sets out the minded-to position, prior to formal consultation, and may be changed when publishing the Final Change Report.
NEXT STEPS:	The Preliminary Change Report will be issued for consultation. Following this, the Code Manager will produce a Final Change Report and the Responsible Committee will make a decision on whether to approve the Change Proposal.

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

PRELIMINARY CHANGE REPORT

RXXXX – CHANGE TITLE

DOCUMENT VERSION	1.0
DATE ISSUED	08/04/2022
DOCUMENT APPROVAL STATUS	NOT YET APPROVED BY RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

LEAD ANALYST	Colette Baldwin	EMAIL

CHANGE OVERVIEW

Distribution Network Operators (DNO) would like the trigger points and timescales for the sending of commissioning information to be amended. This relates to a specific scenario where the Registered Supplier initiates the Energisation of the Supply Point with their appointed Metering Equipment Manager (MEM), and the metering equipment (with Measurement Transformers) has been pre-commissioned off-site prior to installation. The current process expects energisation and installation to run concurrently, however in practice this is not being experienced and is affecting DNO's ability to meet their Balancing & Settlement Code (BSC) obligations.

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0031 is **APPROVED** implementation on 04 November 2022

	High Impact: N/A
	Medium Impact: DNOs & MEMs
	Low Impact: Electricity Suppliers

RETAIL ENERGY CODE

CONTENTS

BACKGROUND		
1.	SUMMARY	**4**
2.	PROBLEM STATEMENT	**4**
3.	USER STORIES	**5**
PROPOSAL		
		5
4.	SUMMARY OF ANALYSIS UNDERTAKEN	ERROR! BOOKMARK NOT DEFINED.
5.	SUMMARY OF IMPACT ASSESSMENT ACTIVITY	
6.	DELIVERY AGAINST CHANGE PROPOSAL PLAN	
7.	KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES	
8.	PROPOSED SOLUTION	
9.	DRAFT LEGAL TEXT	
10.	PROPOSED IMPLEMENTATION DATE AND APPROACH	**6**
11.	CHANGE PATH	**6**
12.	RESPONSIBLE COMMITTEE	**7**
13.	BUSINESS CASE ASSESSMENT	**7**
14.	CASE FOR CHANGE	**8**
15.	CODE MANAGER'S RECOMMENDATION	**8**
16.	CONSULTATION PLAN AND NEXT STEPS	**8**
17.	APPENDIX	**8**
		8
		9
		9
		9

RETAIL ENERGY CODE

BACKGROUND

1 SUMMARY

Changes are needed to the Metering Operations Code of Practice to recognise that many Distribution Network Operators (DNO) are now using Low Voltage (LV) Current Transformer (CT) pre-installed, pre-commissioned metering units for fused supplies. These units are factory commissioned and the vast majority of the commissioning for the units will be completed prior to installation and, consequently, before Energisation too. Where this type of meter is used, the requirement on the DNO to send information at the point of commissioning is no longer possible (as it relates to a date in the past). It may also be much earlier than a Registered Supplier is in place with their Metering Equipment Manager (MEM) appointed. The use of pre-commissioned units was permitted under a Balancing & Settlement Code Change Proposal (BSC CP) - BSC CP1505, which was implemented in November 2018. The timescales for commissioning were set out in an earlier BSC CP 1496, however these are no longer proving to be ideal.

The proposed change would use the date of receipt of the D0139 (MM00036) from the MEM (where the MEM energises the Metering Point) as the trigger point for the DNO commissioning timescales. However, this would leave the existing process in place where the DNO is completing the energisation. So, the proposed solution separates the different trigger points for where the DNO or the MEM energises the Metering Point.

The solution proposed would remove the reference to sending the commissioning information no later than 5 Working Days (WD) after commissioning and replace it with sending it no later than 21WD after Energisation (if DNO energises) or 21WD after receipt of D0139 (MM00036) (if MEM energises). This will allow extra time for the DNO to send the commissioning information on the D0383 (MM00370) but retain the existing overall timescale of within 21WD of Energisation (where the DNO energises) and uses the same timescale where notification of Energisation is sent by the MEM via the D0139 (MM00036).

The receipt of the D0139 (MM00036) is often the point at which the DNO first becomes aware that a fused supply is now Energised. This may be several days/weeks/months after DNO commissioning, and it is proving difficult for the DNO to meet their BSC obligations. For an LV fused supply, the DNO may not be aware of who the MEM is to send the commissioning information to via a D0383 (MM00370) until a D0139 (MM00036) is received. This can be because of new connections being established before a property is occupied and a consumer puts in place a supply contract with an Electricity Supplier.

This solution will sit alongside proposed changes that are to be made to BSCP515.

2 PROBLEM STATEMENT

The Balancing & Settlement Code Procedure (BSCP) 515 and the Retail Energy Code (REC) Metering Operations Schedule sets out the obligations and timescales imposed on the DNO to send commissioning Information to the MEM (using the D0383 data flow), where the DNO has installed metering equipment, with Measurement Transformers.

When the DNO installs Low Voltage Current Transformer (LV CT) metering units, that have been pre-commissioned off-site, the Commissioning of the units is done before installation and separately to the Energisation of the Supply. When the Energisation status change is the responsibility of the Registered Supplier and is requested of the MEM using the D0134 data flow, notification of the change in energisation status is then sent to the Registered Supplier and the DNO by the MEM, using the D0139.

For an LV fused supply, the DNO may not be aware of who the MEM is to send the commissioning information to via a D0383 until a D0139 is received. This is often the point at which the DNO first becomes aware that a fused supply is now Energised. This may be several days/weeks/months after DNO Commissioning, and it is proving difficult for the DNO to meet their BSC obligations.

3 USER STORIES

REF.	USER STORIES
MARKET PARTICIPANT USER STORIES	
M1	As the DNO, I only want to send the commissioning information using the D0383 (MM00370) when I am made aware that the site has now been energised by the Registered Supplier's MEM for a CT Pre-commissioned meter, so that I can meet my regulatory obligations under the BSC
M2	As a MEM I want to receive the Commissioning information from the DNO in a timely manner to ensure my records are accurate and up to date, and that I can provide the Registered Supplier with information to ensure the metering point is accurately settled.

PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

DNOs have been concerned about the BSC non-compliances they are receiving for not sending the Commissioning information to the MEM and the Registered Suppliers where Low Voltage Current Transformer (LV CT) Pre-Commissioned meters are being installed by the DNO, but where energisation is the responsibility of the Registered Supplier's MEM. The DNOs have been in discussion with the BSC to try and identify a solution that retains the urgency to send the information to the requisite parties, but also makes it possible to identify the relevant receiving party, to ensure they have the information at the time it is needed.

The timescales in both the BSC and the REC assume that the parties are known at the time the meter is installed and that energisation happens promptly after the installation. However, where the DNO installs the meter in advance of a Registered Supplier and their MEM being appointed, because the customer has not yet entered into a supply contract, then the DNO has to try and track the Registration of the Supplier and their MEM appointment before they can complete the process and send the commissioning information Market Messages. The DNO has no way of knowing what the likely timescales will be. However, where the MEM installs the Meter, and the

DNO is required to energise the supply, the DNO knows the relevant parties and is in control of the process of sending the information, therefore no change to that part of the process is necessary.

The aim of the solution is to preserve the obligation to send the Commissioning Information in a timely manner, by linking this requirement to the energisation of the meter, rather than date of commissioning of the meter – which was felt to be more appropriate. The solution retains the aim of the commissioning information being provided within a 21 Working Day timescale but moves the obligation to the energisation of the meter, rather than the installation and commissioning date.

5 DELIVERY AGAINST CHANGE PROPOSAL PLAN

	PLANNED	COMPLETED
PARTY IMPACT ASSESSMENT ISSUED	08/04/2022	08/04/2022
DEADLINE FOR ALTERNATIVE CHANGE PROPOSAL SUBMISSION	08/04/2022	08/04/2022
PRELIMINARY CHANGE REPORT ISSUED	08/04/2022	08/04/2022

All activity has been completed within the planned timescales.

6 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

No risks or issues were identified during the development of this Change Proposal.

6.1 ASSUMPTIONS AND DEPENDENCIES

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
1	A BSC CP is approved by the Supplier Volume Allocation Group on the indicative timeline	There are no system changes envisaged, either to central systems or party systems.	This will be confirmed during the consultation phase.
2	The D0139 is always sent by the MEM to the DNO and the Supplier on completion of the energisation activity	The MEM will have certainty that the commissioning information should be received 21 days after energisation, and they can escalate any missing	DNOs will be asked to consider if there will be a greater risk that the D0139 (MM00036) may not be sent by the MEM when energising the relevant meter point?

		commissioning information from the DNO	

While there is a link to the BSC Change, the assumption is that the BSC Change will go live at the same time as the REC Change Proposal, so that the BSC will amend their DNO Performance Assurance activities to reflect this process change when the REC Change is implemented.

7 PROPOSED SOLUTION

The solution preserves the urgency of the Supplier and the MEM receiving commissioning information within 21 days of the meter being capable of flowing energy where it is pre-commissioned.

No alternates were proposed, as this solution addressed the problem statement with the minimum amount of disruption to parties.

The DNO's and the BSC developed the proposed solution to address the unintended consequences of pre-commissioning meters before energisation.

Where the DNO installs a pre-commissioned LV CT Meters, the DNO will wait for receipt of the D0139 (MM00036) before sending the Commissioning Information – no later than 21 Working Days). Where the MEM installs the pre-commissioned LV CT Meter, the DNO will energise the meter and send the Commissioning information no later than 21 Working Days after they have energisation the meter

The BSC and REC Change Proposal timelines have been aligned to ensure consultation and decision making occur together.

8 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0031 can be found [here].

Amend section 6.7.1 to include the date of D0139 receipt from MEM (where the MEM energises) as the trigger point for commissioning timescales. It splits out the different trigger points for where the DNO or MEM energises.

Amend section 6.7.2 to remove the reference to sending the commissioning information no later than 5WD after commissioning (action 6.7.1) and replace it with sending it no later than 21WD after Energisation (if DNO energises) or 21WD after receipt of D0139 (if MEM energises). This allows extra time for the DNO to send the D0383 but retain the existing overall timescale of within 21WD of Energisation (where the DNO energises) and uses the same timescale where notification of MEM Energisation is via the D0139.

Amend section 6.7.3, 6.7.5 and 6.7.6 to include the variation trigger point of receipt of D0139 where the DNO energises. This prevents the MEM timescale for commissioning being reduced where DNO energises.

9 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	4 NOVEMBER 2022

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

It is proposed that the Change Proposal is to be implemented in the November Release (4th November), to align with the BSC Change Proposal, which is expected to be implemented on the 3 November 2022, with both being implemented by a Big Bang approach.

10 CHANGE PATH

CHANGE PATH	SELF-GOVERNANCE

11 RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

12 BUSINESS CASE ASSESSMENT

12.1 COST BENEFIT ANALYIS SUMMARY

The Change Proposal solution is a very light-touch approach for MEMs and Suppliers who are not expected to be required to make any changes to their system to implement this change. The MEMs and Registered Suppliers should see an improvement in the DNO performance of the existing obligations, as there will be increased confidence in when they can expect the Commissioning information from the DNO.

The DNO's will have to change their process to trigger the sending of Commissioning information to the receipt of the D0139 (MM00036) Market Message from the MEM/Registered Supplier. The costs and benefits for this change will be assessed under the BSC Change Proposal, since the driver for this change relates to the DNO's Performance Assurance Risks in the BSC.

13 CASE FOR CHANGE

13.1 SELF-GOVERNANCE

The proposed solution appropriately resolves the Problem Statement. The costs and effort of implementing the solution are minor and will fall on the party who will benefit most from the change. DNO's expect to see improvements in their BSC performance metrics in relation to sending the Commissioning information, based on the use of a more appropriate trigger.

The solution addresses the challenges Registered Suppliers and MEMs have in receiving Commissioning information in a timely manner. This will allow them to accurately measure the energy flowing through the meter and bill the customer accordingly.

14 CODE MANAGER'S RECOMMENDATION

Based on the assessment of the problem statement, the solution proposed and the business case, the Code Manager believes there is a positive case to implement this change proposal.

The Code Manager recommends to the Metering Expert Panel **approval** of:

- The proposed change solution.
- The proposed implementation approach.
- The proposed implementation date of 4 November 2022.

15 CONSULTATION PLAN AND NEXT STEPS

The consultation on this Preliminary Change Report for R0031 will be published on the REC Portal on **8 April 2022**. Consultation closes on **4 May 2022**

Following consultation, the Code Manager will produce an updated version of this Preliminary Change Report (referred to as the Final Change Report). This will include the outcome of the consultation, setting out a summary of the consultation submissions and the Code Manager's response.

The Final Change Report will be issued to the METERING EXPERT PANEL to make its determination.

16 APPENDIX

CHANGE PROPOSAL	Link
DRAFT LEGAL DRAFTING	Can be found on the Change Proposal Page.