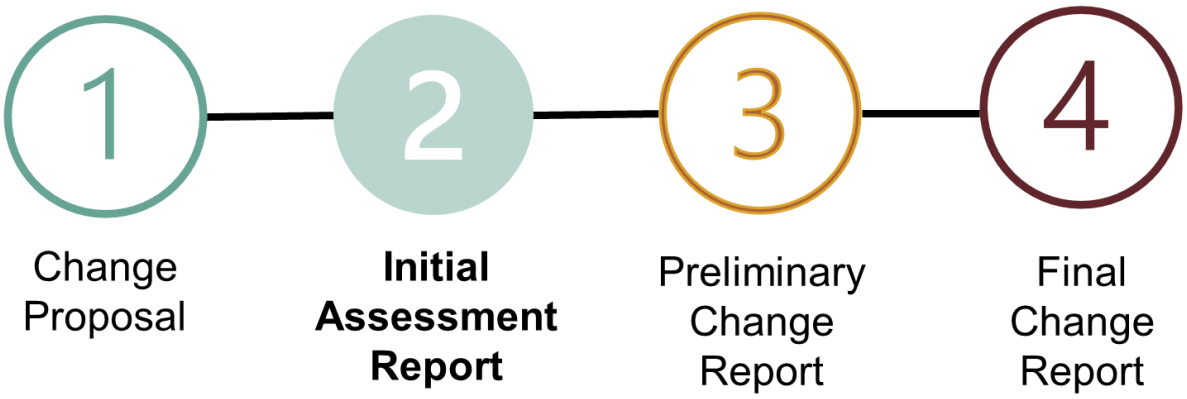
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INITIAL ASSESSMENT REPORT



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

R0043 – COMMISIONING OF WORKS BY THE CROWDED METER ROOM COORDINATOR (CMRC) TO RESOLVE ISSUES IN CROWDED METER ROOMS

DOCUMENT VERSION	1.0
DATE ISSUED	05/08/2022
DOCUMENT APPROVAL STATUS	APPROVED BY REC CHANGE PANEL
RESPONSIBLE COMMITTEE	CHANGE PANEL

CHANGE OVERVIEW

This Change Proposal is to introduce new processes which will allow a Crowded Meter Room Co-ordinator (CMRC) to contract with a REC accredited Metering Equipment Manager (MEM) to act on behalf of the CMRC, so that they may resolve issues in a Crowded Meter Room (CMR) on behalf of all Registered Suppliers within that meter room.

The MEMs undertaking this work on behalf of the CMRC will be referred to as the Crowded Meter Room MEM (CMRM).

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

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1 SUMMARY

Energy Suppliers have a licence obligation to ensure the availability of services to facilitate the installation and operation of equipment that will enable the extension of the Home Area Network (HAN) at relevant premises, where it cannot be established through the installation of a Smart Meter and Communications Hub.

Within their consultation document[1], the Alternative Home Area Network Company (Alt HAN Co) claim that Crowded Meter Rooms may impact the full HAN enabled provision of Smart metering for an estimated upper limit of 33,971 Multi Dwelling Units (MDUs) / 181,540 Customers (MPANs) in GB (based upon Alt HAN Co market sizing from 2020). These properties are currently unable to benefit from smart metering because they are in places where the components of their HAN; energy meters, in-home devices, and communications hub, are too far apart to connect with each other.

For many MDUs e.g., flats, alternative HAN equipment is required. This will involve the additional use of a wired Point to Point device that is installed near to the electricity Smart Meter and connected to the tails of that Smart Meter and at least one further device in the Consumer premises.

Work carried out by Alt HAN Co, in collaboration with industry, has identified additional challenges posed by 'Crowded Meter Rooms' (CMR) for the installation of alternative HAN and smart equipment. A CMR, is a scenario whereby a meter room or meter cupboard, contains metering equipment in a space that is constrained. This results in challenges to installing or replacing metering equipment, specifically alternative HAN equipment. In addition, SMETS2 installations could be prevented without corrective works.

As a result of industry discussions, Alt HAN Co proposes the creation of a new Market Role of Crowded Meter Room Co-ordinator (CMRC) who can assess potential CMR buildings and identify the costs and options for resolving CMR issues. A CMRC would have the ability to act on behalf of other industry Parties and be able to commission necessary metering works, using a newly created role of the Crowded Meter Room MEM (CMRM).

A process would be required to resolve CMRs, to enable Suppliers to fully deploy solutions to establish a HAN for all alternative HAN candidates (and potentially any corresponding SMETS2 candidates). Alt HAN Co is progressing work to establish a CMRC and a Distribution Connection & Use of System Agreement (DCUSA) Change Proposal (DCP400) has been raised to establish permissions for a CMRM (referred to as Shared MOP in DCUSA) to undertake these types of works, where such work is approved.

This REC Change Proposal seeks to introduce the changes necessary to allow an Alt HAN Co contracted MEM (to be known as the CMRM), to utilise industry Market Messages and associated processes, when undertaking works to resolve CMR issues, when they are not the MEM associated to the Registerable Measurement Point (RMP).

[1] Consultation Document

2 PROBLEM STATEMENT

For many MDU, Alt HAN Co equipment is required. This needs to be installed near to the electricity Smart Meter, connected to the tails of that Smart Meter, and requires at least one further device in the Consumer premises. However, the installation of HAN equipment can be inhibited by CMR for the installation of alternative HAN and smart equipment.

The objective of the CMR work is to leave a meter room ready for Energy Suppliers to proceed with their installations to meet their smart metering rollout obligations. Without the ability to install the alternative HAN wired bridge device in a CMR, Energy Suppliers will ultimately be unable to establish a HAN with the associated premises in the MDU.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As a Consumer I want to be able to have a working Smart Meter that can communicate with my Energy Supplier so that I can receive the benefits of smart metering.
C2	As a property owner I want to be able to have Smart Meters installed in my properties where there are currently issues with meter room space or other technical constraints preventing installation so that my tenants can access the benefits of having a Smart Meter.
C3	As a property owner I want a co-ordinated and managed process for resolving crowded meter room issues so that I am not contacted by or dealing with multiple Suppliers or metering agents for a single property.
MARKET PARTICIPANT USER STORIES	
M1	As a Distribution Network Operator, I need to be able to send and receive data, from the CMRC related to danger, interference, or damage to my equipment so that I can fulfil my obligations.
M2	As a MEM I need a co-ordinated approach to resolving the CMR issues, to enable me to install working Smart Meters on site.
M3	As an Energy Supplier, I need to be able to send and receive data, from the CMRC related to interference, faults, or damage to my equipment so that I can fulfil my obligations.
M4	As an Energy Supplier I need a coordinated approach to resolving the crowded meter room to enable me to meet my regulatory obligations related to Smart Meter installations and Communications.
M5	As an Energy Supplier, I want to know of CMR works being carried out so that I am informed of relevant updates regarding RMPs that I supply. In addition, I wish to be informed if the CMRM identifies any metering issues during their initial assessment or rectification works.
M6	As an Energy Supplier, I need a co-ordinated approach to resolving the crowded meter room to allow me to access Smart Meter data.

4 IMPACTS

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

REC SERVICE PROVIDERS
Electricity Enquiry Service (EES)

CONSUMERS
Electricity Consumers

RECCO AND REC CODE MANAGER
Code Manager

REC DOCUMENTS / PRODUCTS
Meter Operation Code of Practice (MOCoP)
Metering Operations Schedule 14 - Metering Operations
Schedule 1 – Interpretations
Data Specification
Schedule 12 - Data Access
Data Access Matrix (DAM)

The impacts and impacted parties will be validated during the Solution Development phase of this change.

The Code Manager will review the Accreditation process in light of this new type of MEM (the CMRM) and consider a new definition of a CMRC role undertaking service alterations.

The Code Manager will need to understand the impacts, and will obtain legal advice on whether the Alt HAN Co in its proposed new capacity as the CMRC will need to accede to the REC to ensure that the relationship between the CMRC, the CMRM, the Supplier and the Supplier Agent is explicit within the REC.

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

The Code Manager will need to understand and assess the full scope of the types of Consumers and Suppliers impacted, for example, there could be micro-businesses attached to MDUs which share the same meter room.

The solution will need to consider how householders of occupied premises may need to provide any Priority Services information, (as the site owner may be unaware of those needs) and how the CMRM will have access to the relevant information in advance of carrying out the work (such as applicable Priority Services categories, and details of the Registered Supplier and potentially their appointed Agents).

The Code Manager will also consider whether there is a need to clarify the scope of eligible activities the CMRM will be permitted to undertake and whether this should be defined and set out in the REC. This will include the assessment of Retail Risks and determining if there are any new or additional impacts to existing risks. General Data Protection Regulations (GDPR) impacts and consents will be considered as part of the solution development activity.

Alt HAN Co have indicated that the intention is to not install new Smart Meters, however in cases of the CMRM identifying aged or faulty equipment they will replace that equipment. The impacts of this approach will need to be assessed by the Code Manager.

The development of the solution will consider the impacts to MEM'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 CMRM communicating with the Registered Supplier, their appointed MEM and/or DNO and may also require the CMRM to communicate information where the site has been left De-energised for safety reasons.

The development of the solution will determine how 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, their appointed MEM and or DNOs.

Further Impact Assessments may be required to validate any additional impacts identified during the Solution Development phase, this will be determined at the point the solution and legal text have been defined.

4.1 CROSS CODE IMPACTS

The Cross-Code Steering Group (CCSG) will be requested to review the Change Proposal and agree co-ordination of the progression of this change with DCP400 and any other identified cross code impacts.

DCUSA Impact - A proposal has been raised under the DCUSA, DCP400 - Commissioning of Works using shared Meter Operator services by the Crowded Meter Room Coordinator, that seeks to establish the ability for a 'shared Meter Operator' to undertake activities on behalf of Energy Suppliers, as instructed by Alt HAN Co, for the purposes of the identification and resolution of Crowded Meter Room issues.

SEC Impact – The SEC have reviewed the DCUSA Change Proposal and do not anticipate any Cross-Code impact.

5 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	AUTHORITY APPROVAL
RESPONSIBLE COMMITTEE	CHANGE PANEL

The Code Manager considers that this Change Proposal will require Authority determination due to the potential impact on existing or future energy Consumers. This aligns with the approach for the associated DCUSA change DCP400.

Both the REC and DCUSA proposals should be submitted to the Authority for joint consideration. Whilst DCUSA DCP400 is progressing we will continue to engage with the CCSG to ensure change plans are re-aligned, where possible.

As the identified REC Products fall under the responsibility of the Metering Expert Panel, Technical Expert Panel and Change Panel, we propose that the appropriate Responsible Committee for this Change Proposal would be the Change Panel.

6 PRIORITY STATUS AND URGENCY

PRIORITY STATUS	MEDIUM
URGENCY	STANDARD

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PRIORITISATION MATRIX

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

Weighted Significance Sco	2
Urgency	1
Overall Priority Score	21
Effort	3 - Significant

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
Medium

The Priority Status for this Change Proposal is ‘Medium based on a ‘Significance’ score of ‘2’ and an ‘Urgency’ score of ‘1’. This is broken down as below:

Significance

Legal/Regulatory Compliance – A score of 2 as this change will facilitate the work that seeks to enable the installation of smart metering equipment to support Energy Suppliers in meeting their Smart Meter rollout obligations.

Strategic Direction – A score of 2 as this change facilitates the Smart Metering Programme objectives and Energy Supplier obligations regarding implementing HAN where an existing Comms Hub cannot reach the Consumer premises.

Consumer Impacts – A score of 2 as this change will enable Consumers to access the benefits of having a Smart Meter in circumstances which are currently prevented.

Urgency - This Change Proposal has been given an urgency score of 1 to reflect that there is no immediate priority to progress this change.

The Code Manager has determined an effort score of 3 – Significant as this is a change requiring full solution development, as well having impacts on multiple parties and documents.

7 SUMMARY OF CHANGE PROPOSAL PLAN

The solution to this Change Proposal has not been fully defined, therefore a period of solution analysis and development will be required. Following the solution development activity, the Code Manager will update the Change Proposal Plan to set out the required activity and timelines for progressing the proposed solution.

	FROM	TO
SOLUTION ANALYSIS AND DEVELOPMENT	22/08/2022	20/10/2022
PRESENT APPROACH TO RESPONSIBLE COMMITTEE	15/11/2022	15/11/2022

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8 GLOSSARY

TERM	DEFINITION
Alt HAN Company (ALT HAN Co)	means the company established in accordance with Section Z2 of the Smart Energy Code
Balancing and Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
Crowded Meter Room (CMR)	means a room containing multiple metering points, with special constrains to the extent this may be prohibitive of installation or other works.
De-energise	Shall have a meaning given under the DCUSA, and 'De-energised', 'De-energisation' and similar expressions shall be interpretated accordingly.
Distribution Connection and Use of System Agreement (DCUSA)	means the agreement of that name maintained pursuant to the Electricity Distribution Licences.
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Home Area Network (HAN)	means the home area network for communications between decides forming part of a Smart Metering System.
Market Domain Data (MDD)	has the meaning given to that expression in the BSC.
Market Message	means a structured communication sent between two Market Participants in the form and with the connect required (and as otherwise specified) by the Data Specification.

TERM	DEFINITION
Metering Equipment	means: (a) in relation to gas, all the components of a meter installation and ancillary equipment, as defined in IGEM/G/1 edition 2; or (b) in relation to electricity, means the equipment associated with a particular meter, including the meter itself and any related Current Transformer (CT) and/or Voltage Transformer (VT), communication and/or control equipment, as may be further defined in the BSC
Metering Equipment Manager (MEM)	means, as applicable, either: (a) for electricity, the MEM 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.
Multiple Dwelling Unit (MDU)	means a building containing more than one domicile.
Performance Assurance	means the activities undertaken by the Code Manager and the REC PAB in accordance with the Performance Assurance Schedule
Performance Assurance Framework (PAF)	means the Performance Assurance Schedule and the documents, processes and arrangements established pursuant to the Performance Assurance Schedule, for the purposes of (or in relation to) the monitoring and assurance of roles and obligations undertaken by REC Service Users and REC Service Providers pursuant to this Code.
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.
Priority Services Register (PSR)	means the register of certain of Domestic Customers established and maintained by relevant Parties pursuant to their licence.
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).

TERM	DEFINITION
Registered Supplier	means, in respect of an RMP and at any time, the Energy Supplier recorded against that RMP in the Central Switching Service at that time with an Active or Secured Inactive Registration Status (or, in respect of a period of time, the Energy Supplier that had, has or will have an Active or Secured Inactive Registration Status in respect of that RMP during that period).
Registrable Measurement Point (RMP)	means a Supply Meter Point or Metering Point identified in the Central Switching Service.
Secure Data Exchange Portal (SDEP)	means the portal of that name which forms part of the Secure Data Exchange Service.
Smart Energy Code (SEC)	means the code of that name maintained pursuant to the DCC Licence.
Smart Metering Equipment Technical Specification (SMETS)	means the Smart Metering Equipment Technical Specifications set out in the Smart Energy Code