RETAIL ENERGY CODE

CONSOLIDATED NON-CONFIDENTIAL CONSULTATION RESPONSES

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

On 18 August 2023 the Code Manager issued a Consultation to industry to seek feedback on the Preliminary Change Report for R0043. We received 11 responses.

The purpose of this document is to consolidate responses as well as answer any questions raised within those responses.

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RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Gemma Dixon

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RESPONSE DEADLINE	11/09/2023

Question 1	Respondent Details	Response	Code Manager comments
Did you attend the Webinar hosted by the Alt HAN Co on the 10 August 2023?	British Gas Energy Supplier	Yes, a number of our team, from different business areas, did attend this call.	Noted thank you.
	Scottish Power Energy Supplier	Yes	Noted thank you.
	SSE Energy Supplier	Yes	Noted thank you.
	Northern Powergrid DNO	Yes	Noted thank you.
	National Grid Electricity Distribution DNO	Yes	Noted thank you.
	Scottish Power Energy Networks	No.	Noted thank you.

	DNO		
	Siemens MEM	Yes	Noted thank you.
	Utilita MEM	No	Noted thank you.
	EON MEM & Supplier	Yes a representative from E.ON UK attended the referenced webinar.	Noted thank you.
	Alt HAN Co	N/A (Alt HAN were the hosts)	Noted thank you.

Question 2	Respondent Details	Response	Code Manager comments
Do you have any questions or concerns related to implementing any of the Market Messages required by	British Gas Energy Supplier	The REC flows being introduced in Section 22 look sensible and do seem to have considered all the required scenarios. We also think that the approach chosen where it is closely aligned to the Section 21 requirements for SIPs is sensible – utilising the same data flows and response requirements.	Noted thank you. The Alt HAN Forum will determine whether to invest in a CMR service. If they agree then a CMR system will be developed and tested with Suppliers engaged through Alt HAN Governance groups. A system

the solution? Please provide details.		At Initial Assessment stage, we had raised one question on 22.5.3 'Send Notification of the Work Completion', as we did not understand why this is being done through a separate AltHAN process, rather than using the D0396 dataflow developed for Section 21. We now understand the rationale for this – that other checks need to be carried out by the CMRC to before the Work Completion can be confirmed. Comments on D0139 and D0179 are in our answer to Question 3. Whilst the REC changes look reasonably manageable, we have a lot of concerns about the broader systems integration that will be required, as outlined in our answer to Question 4.	specification has been shared with potential vendors to determine a cost, this has been shared with the Alt HAN Forum.
	Scottish Power Energy Supplier	We have no concerns to raise at this time but if we become aware of any other concerns, we will raise accordingly	Noted thank you.
	SSE Energy Supplier	As we advised in our previous response, we still believe there is a need for a scenario variant to be included to issue the D0139 to the MEM. This would	The CMRM will inform the supplier of danger damage or interference using the appropriate comms method. Due to the urgency with danger, the supplier should

		ensure that all impacted parties are updated at the same time without delay. We would like to request REC reconsiders this variant.	make contact with their MEM to attend site. If the CMRM informs the MEM in addition to the supplier, there is a risk that this could be confused with instructions coming from the supplier, particularly in circumstances of danger, resulting in the need for MEMs to create an exception process, so not to action the instruction twice. This was discussed at length by the MEP under R0021 (SIP) and this option was chosen as the preferred solution.
	Northern Powergrid DNO	No.	Noted thank you.
	National Grid Electricity Distribution DNO	Our concerns are only surrounding the role code for the CMRC, which is dependent on both the BSC and R0132. We highlighted that the implementation of a 2CHAR role code would require significant changes to several systems with cost and time implications.	Thank you. Since issuing the Consultation on R0043, the BSC have provided an alternative Role Code which will be allocated to the CMRM role, removing the dependency on a new 2CHAR solution.
	Scottish Power Energy Networks DNO	We have not identified any questions in relation to the solution proposed.	Noted thank you.

	Siemens MEM	There is a known dependency that this change cannot be delivered without first extending the role codes from alphanumeric 1 to alphanumeric 2 bytes (R0132). We are concerned that R0132 has not progressed beyond the Initial Assessment phase. From our point of view, R0132 is a far larger change than R0043.	Thank you. Since issuing the Consultation on R0043, the BSC have provided an alternative Role Code which will be allocated to the CMRM role, removing the dependency on a new Role Code format being implemented. Change Proposal R0132 has been withdrawn to allow progression of the change to the logical format under the BSC, who own the Role Code Data Item.
	Utilita MEM	Yes, We are concerned with the use of the D0179 in cases of pre-pay energisation changes. For example, Currently D0139 is used as the standard message for all energisation changes regardless of meter type on site. We need to understand, in the case of smart meters; • How the decision is made as to which de-energisation flow will be sent e.g. will it be the D0179 or D0139? • Will this be dependent on the meter mode as it is in DCC? • What will the normal process be for assets that aren't enrolled? Also, We would like clarity on what scenario variants are being added to Market Messages; • MM00013/D0002 • MM00016/D0126	Following Consultation responses, Parties have suggested that they would prefer to only receive the D0139, this has been reflected in the final proposed solution.

		• MM00023/D0135 • MM00029/D0136 • MM00036/D0139 • MM00093/D0179 • MM00121/D0221.	
		Broadly speaking, E.ON would support this change, as long as the long term processes were adequately and properly worked through correctly from both a supplier and MEM perspective. There are a number of areas within the process that at present both Suppliers and MEM's will need to work together on to ensure that data flows are sent correctly, and the correct customer engagements and contracts are set up appropriately. We refer to specific areas of concern in our response to question 6 below.	Noted thank you.
	Alt HAN Co	No	Noted thank you.

Question 3	Respondent Details	Response	Code Manager comments
The CMRM may not have access to Prepayment Data Items	British Gas Energy Supplier	We would prefer to receive the D0179 message for Prepayment meters, provided the implementation costs to introduce the necessary optionality on various current mandatory Data items are not too costly.	

in order to populate the D0179. In order to facilitate this, it is possible to introduce optionality on current mandatory Data Items within the D0179. This will change the Version number of the Market Message and would require system updates in order to send/receive. Based on this, would your organisation prefer to receive the D0139 only or the D0179 for change in energisation statuses for Prepayment Meters?		We agree with one of the other respondents at the Initial Assessment stage that it would be useful to know the Prepayment credit balance on the meter, in the scenario that the meter could not be re-energised.	Following this consultation, we will no longer be progressing the use of the D0179. To enable Prepayment Credit validation when the meter is re-energised a pre and post photograph may prove useful to confirm the values are correct.

	Scottish Power Energy Supplier	We would prefer receipt of a single flow D0139 to manage this process. However, introduction of optionality on current mandatory data items on existing flows would require system changes to ensure existing business processes are not impacted by this change.	Noted thank you.
	SSE Energy Supplier	We do not utilise the D0179 data flow as we do not have a prepayment customer base, therefore we do not have any comments on this question.	Noted thank you.
	Northern Powergrid DNO	D0139 only.	Noted thank you.
	National Grid Electricity Distribution DNO	Supplier only	Noted thank you.
	Scottish Power Energy Networks DNO	As a DNO we do not receive the D0179 flow and rely on the D0139 flow for updates to energisation status.	Noted thank you.
9	Siemens MEM	The D0139 only, without change/s to the flow version would be preferred as this would be a smaller change to implement.	Noted thank you.

	Utilita MEM	We would prefer to receive the D0139 only for the change in energisation statuses, as this is the current industry standard message for energisation status changes. We do not currently use D0179's for this purpose, we would need to make changes and develop our system to generate/process D0179 flows. Therefore, we do not support a solution that uses the D0179, as this will add unnecessary additional costs.	Noted thank you.
	EON MEM & Supplier	Please see our responses to question 6 for further detail	Noted thank you.
	Alt HAN Co	N/A However AHC will ensure any CMR MEM complies with the preferred approach.	Noted thank you.

Question 4	Respondent Details	Response	Code Manager comments
Do you agree with the proposed Implementation date? Please provide rationale.	British Gas Energy Supplier	We consider the proposed implementation date of 28th June 2024 for R0043 and the launch of the 'at scale' Crowded Meter Room process is too soon. We believe this should be delayed by 9 months, for three reasons:	Noted thank you.

		1. Complexity of Requirements The R0043 changes are just one part of the development needed to deliver the CMR framework and cannot be implemented in isolation. The *'R0043 Solution Overview v1.1'* document, that accompanied this consultation, discusses the need for agreed means of communication, and a system still to be developed by the CMRC for securely storing and sharing information between AltHAN and the various MEMs/Suppliers/DNOs. The *'CMRC Requirements Traceability Matrix (RTM)'* pack, that also accompanied this consultation, contains 52 pages of detail on requirements for the successful implementation of the CMR enduring solution. We have not yet had time to fully digest and understand the implications of this operationally, but it looks complex, both in terms of set up/system requirements, and in terms of the specialist resource required from each party on an ongoing basis. We have some practical concerns on the customer communications which we have raised in our answer to Question 6 below. There needs to be a realistic assessment (and industry-wide agreement) of the requirements. It is not clear when there will be an interface spec that we	The Alt HAN Forum is considering investing in a CMR service. If agreed, then a CMR system will be developed and tested, and Suppliers will be engaged through the Alt HAN Governance groups. Alt HAN Co have shared a system specification with potential vendors to understand the likely cost, this has been shared with the Alt HAN Forum. In addition, the CMR processes relating to day-to-day CMR Activity will be captured within the Alt HAN Supplier contract and Alt HAN Forum Governance. Alt HAN has previously shared the full requirements for CMR and requested Supplier feedback on costs/resources. Alt HAN anticipates that Suppliers would provide a mailbox/point of contact for matters related to CMR.

		can begin to work around. As has already been seen in MHHS and FMRS, complex pan-industry developments often have much higher budget and development time requirements in practice than were originally anticipated. **2. Business case currently marginal** The updated business case has not been published as part of this REC consultation, but – alongside most other Suppliers – we have seen updated details at the 31st of August Forum meeting. The business case currently looks close to £zero, but still does not yet include all of the related Supplier costs (technical and operational, ongoing running costs as well as up front build). There are clearly differences in approach between the MEMs in the Pilot, which needs to be investigated as this skews the business case dramatically. There also needs to be further information on outcomes – what proportion of meter rooms are viable, and practically, what are the real rather than forecast benefits on the number of new smart installs this enables, once any customer resistance is taken into account. There needs to be a confirmed, agreed, final business case in place before suppliers are expected to commit	The assessment for the change to the REC relates to only to the changes to Market Messages as an enabling change to the end-to-end solution. Therefore, the REC Code Manager can only assess the business case for the REC Code elements. The Code Manager notes the concerns regarding the business case for a CMR system under the ALT HAN Forum, however this will be a matter for members of the ALT HAN Forum to consider when approving any solutions.

		and undertake investment to work on the enduring solution, in line with any other industry programme. We are engaging separately with AltHAN on this through bilateral discussions but wanted to flag our concerns here as well. **3. Competing industry and regulatory priorities.** Even if the full interface spec requirements (for 1) were known already, and the lead time for implementation was possible, it is still not certain that its development could be prioritised in the various Supplier's change plans, due to urgent competing priorities on resources for the next 3-12 months, including the implementation of the requirements that are expected to come out of the OFGEM consultation on Consumer Standards, the challenge of meeting the Smart Mandate targets and need to focus resources and demand generation to larger cohorts of eligible customers, the work programmes to restore smart functionality to non-comms customers, and the necessary complexities of managing the RTS switch off, particularly for customers in no-WAN areas and those with RTS prepayment meters. Practically, whilst the need for a crowded meter room enduring solution is clear, if the full smart programme ambitions are to be achieved, there needs to be a	The Code Manager acknowledges the volume of industry activities however the changes for the REC are minimal and the wider benefit of this change are about bringing smart meters to a segment of the market that is currently prohibited from having a smart meter and therefore the trade-off between the change and the benefits is reasonable. However, it is up to suppliers to consider how they want to manage the processes between ALT HAN Co for CMR resolutions and whether to implement a systemised process or continue to operate on a manual basis as is being done under the trial.

		considered approach that does not put other delivery targets at risk.	
	Scottish Power Energy Supplier	All IT and operational changes that may be necessary (e.g., additional role code changes etc.) will take time to implement therefore we expect a minimum of 12 months implementation time period. It must also be noted that any such changes would need to be considered within the context of the other market programmes currently underway (e.g., MHHS) so may not be prioritised.	The REC solution will introduce new Scenario Variants into Market Messages and therefore the Code Manager believes a 6-month lead time from the decision date is sufficient, given that this change has been widely publicised during the last 12 months.
	SSE Energy Supplier	We do not have any concerns with the proposed implementation date as this will provide us at least 6 months lead time from approval.	Noted thank you.
	Northern Powergrid DNO	Yes.	Noted thank you.
	National Grid Electricity Distribution DNO	The proposed implementation date is fine – but we would potentially be looking at requiring a two month lead time to implement a 2CHAR role code – so with this being dependant on other change, we would request that there is a potential interim solution for the MM we would be receiving, so that we do not hold up the implementation of the role at large	Noted thank you. Since issuing the Consultation on R0043, the BSC have provided an alternative Role Code which will be allocated to the CMRM role, removing the dependency on a new 2CHAR solution and are taking forward changes to the logical format of the Role Code separately under the BSC.

	Scottish Power Energy Networks DNO	We believe that there is a dependency on the R0132 for the delivery of this change – we have not been supportive of the R0132 change due to the impact that this will have on MHHS deliverables and the lack of time that we have had to conduct an impact assessment in this area - this is a significant change. Given the close relationship between these changes we cannot support the proposed date for this change implementation.	Thank you. Since issuing the Consultation on R0043, the BSC have provided an alternative Role Code which will be allocated to the CMRM role, removing the dependency on a new 2CHAR solution and are taking forward changes to the logical format of the Role Code separately under the BSC.
	Siemens MEM	No. Until the known dependency of R0043 (R0132) is resolved, we cannot know if the time stated release date (28/06/24) allows for sufficient time to deliver both R0132 and R0043. For us, R0132 is the larger of these changes. We suggest that R0132 should drive the delivery date, not R0043.	Thank you. Since issuing the Consultation on R0043, the BSC have provided an alternative Role Code which will be allocated to the CMRM role, removing the dependency on a new 2CHAR solution and are taking forward changes to the logical format of the Role Code separately under the BSC.
	Utilita MEM	Yes, we believe the date is achievable, but this is dependent on the solution utilising the D0139. Should the solution utilise the D0179 then this would require additional business changes, for which we would require more time.	Noted thank you. Since issuing the Consultation on R0043, the BSC have provided an alternative Role Code which will be allocated to the CMRM role, removing the dependency on a new 2CHAR solution and are taking forward changes to the logical format of the Role Code separately under the BSC.

	EON MEM & Supplier	We are broadly aligned with the proposed choice of implementation date subject to adequate processes being worked through in advance.	Noted thank you. The Code Manager and representatives from EON and Alt HAN met to discuss and work through their consultation response to ensure all points have been addressed satisfactorily. EON's representatives confirmed that a minimum 6 month implementation lead time would be required.
	Alt HAN Co	The Implementation Date for R0043 should be driven by how long the system changes will take for any DTN changes and participant system changes. If this is 28 June 2024 then AHC will plan its mobilisation activity to meet this date. Following a decision by the Alt HAN Forum to stand up the CMR service Alt HAN would undertake a number of activities with Energy Suppliers (and other parties involved in CMR (e.g. (I)DNOs) in the period between now and June 2024. This mobilisation activity will involve: • Implementing the changes to the Alt HAN Supplier Contract to set out the obligations and activities expected from Suppliers and the CMRC • Build and testing of the CMR system for all CMR participants to use • Selection of the MEMs to enter into the enduring service	Noted, thank you.

		• Supplier workshops to prepare for thes enduring service • Continuation of CMR activity at low level in accordance with the REC Sandbox • Collation of data on CMR Cases identified by industry participants • Engagement with landlord/building owners with multiple properties identified through the pilot	

Question 5	Respondent Details	Response	Code Manager comments
Do you agree with the Code Manager's Case for Change and recommendation? Please provide your rationale.	British Gas Energy Supplier	We agree with the Code Manager's Case for Change in the preliminary change report. The changes under R0043 are necessary to enable the required communication between parties with regard to crowded meter rooms. As regards the Code Manager's Recommendation. We agree that the proposed change solution and proposed implementation approach (for the REC elements) seem sensible. However, we disagree with the implementation date, as outlined in our reply to Question 4.	Noted. Thank you

	Scottish Power Energy Supplier	Yes - It provides a communications mechanism, for the CMRC and its contracted MEM/s, in their efforts to work with Suppliers to ensure that more customers are able to access smart metering benefits.	Noted thank you.
	SSE Energy Supplier	We believe that excluding a scenario variant from the supplier to the MEM does not better facilitate the justification for REC 'To ensure the REC operates and evolves in a manner that facilitates the achievement of its mission statement. We strongly believe this scenario variant should be included.	The CMRM will inform the supplier of danger damage or interference using the appropriate comms method. Due to the urgency with danger, the supplier should make contact with their MEM to attend site. If the CMRM informs the MEM in addition to the supplier, there is a risk that this could be confused with instructions coming from the supplier, particularly in circumstances of danger, resulting in the need for MEMs to create an exception process, so not to action the instruction twice. This was discussed at length by the MEP under R0021 (SIP) and this option was chosen as the preferred solution.
	Northern Powergrid DNO	Yes.	Noted thank you.

	National Grid Electricity Distribution DNO	Yes – there is a requirement to bring this coordinator to market	Noted thank you.
	Scottish Power Energy Networks DNO	While we do not disagree with the Code manager's case for change, we are of the view that due consideration has not been given to the consequential effects of this (and associated enabling changes) on the greater industry landscape. There will be a requirement to assess against the MHHS baseline design, particularly in reference to the additional fields required in the market participant role code. We believe that this is a fundamental change to Participants systems which has not been fully assessed.	Thank you. Since issuing the Consultation on R0043, the BSC have provided an alternative Role Code which will be allocated to the CMRM role, removing the dependency on a new 2CHAR solution. We have continually engaged with the BSC regarding MHHS impacts of any REC changes.
	Siemens MEM	Yes, the need for the role and the method in which this role will be utilised makes sense.	Noted thank you.
	Utilita MEM	Yes, we agree with the change as we believe it will make smart metering more obtainable to more customers, particularly those that are most vulnerable. However, we are concerned with the fact there may be internal business changes required (should the solution utilise the D0179 data flow), which will add an additional cost to implementing the change.	Following Consultation responses, Parties have suggested that they would prefer to only receive the D0139, this has been reflected in the final proposed solution.

	EON MEM & Supplier	Yes, we agree with the Code Manager's Case for Change and the recommendation. Please see our responses to question 6 which outlines our concerns with the proposal and recommendations for further considerations however from a supplier perspective.	Noted thank you.
	Alt HAN Co	AHC agrees with the recommendation but notes it's ultimately the decision of Suppliers (via the Alt HAN Forum) if they wish to fund a CMR service. The CMR pilot has proved that coordinated activity works and Suppliers have now started installing smart metering equipment in buildings where CMR resolution has occurred. The absence of a mechanism to resolve CMRs means that some customers may not receive smart benefits or the full range of smart benefits.	Noted thank you.

Question 6	Respondent Details	Response	Code Manager comments
Do you have any other comments relating to this Change Proposal?	Anonymous Energy Supplier	Overall, we support the purpose for this change and believe that the work will be beneficial to the overall smart rollout. We are eager to ensure that this process does not follow the same rushed approach as other REC changes and therefore really push the point of	A note from Alt HAN stated: Assuming the Forum agree to establish a service they will be subsequently asked if they wish that service to be extended to all CMRs, regardless of whether this resolves the

		ensuring time is taken to review the process, gain feedback and for suppliers to be able to implement this change. By allowing time it will mean that the already complicated process of moving meters will be more efficient and less disruptive for all involved. We also feel that is the scope of this change is not widened to include all crowded meter rooms, and not just those suitable for Alt HAN, we are missing a bigger opportunity. We hope to see the scope of the CMRC extended	room for Alt HAN installations or standard smart installations.
	Scottish Power Energy Supplier	We have no further comments at this time but if we become aware of any other concerns, we will raise accordingly.	Noted thank you.
	SSE Energy Supplier	REC need to consider the cost benefit and relative costs for the implementation of this change and additional systems to support this new process. The changes made between the different parts of the REC change process need to be clearly marked to ensure that smaller suppliers are aware of these. There is a significant risk that smaller suppliers do not have the relevant resource to be able to assess these changes in their entirety. In relation to our previous response and the responses provided by REC, please see further comments below – SSE - It is not clear within the proposed solution how it will be determined that a CMRC will need to attend the site to complete a pre-	There will be a mechanism for industry participants to notify Alt HAN of a potential CMR (via a CMR system or email). Once identified the CMR MEM will conduct an initial visit to determine the status of the meter room. The only reason the CMR MEM would not attend would be if sufficient information was provided to enable them to make a remote assessment. AHC expects in most cases those reporting the potential CMR will be unlikely to provide photographs and other information so in most cases a visit will be required. No sensitive data is requested

		assessment. REC - CMRC would expect Suppliers to notify them either via the CMR system or via email. Is the use of email increasing the risk of GDPR, what information would be expected to be sent? This also goes against why the SDEP was implemented.	from notifying parties to commence an initial survey.
	Northern Powergrid DNO	No.	Noted thank you.
	National Grid Electricity Distribution DNO	N/a	Noted thank you.
	Scottish Power Energy Networks DNO	No other comments	Noted thank you.
	Siemens MEM	No	Noted thank you.
	Utilita MEM	No, we have no comments directly related to this change proposal. However, we would welcome discussion on how we, as a MEM, can become a CMRC.	AHC ran a procurement in 2022 to procure MEMs for the CMR service (commencing with a pilot). This tender was open to all MEMs and advertised through industry Forums including the AMO. The CMR MEMs will be drawn from the pool of

			current CMR MEMs who have the pilot experience. DCUSA currently only recognise ALT HAN as a CMRC. If an organisation wishes to become a CMRC a DCUSA change would be required to set up the liabilities' framework, a BSC change would be needed to allocate a role code and would need a commercial agreement between themselves and Parties that want them to operate as a CMRC on their behalf that would need governance and transparency.
	EON MEM & Supplier	Please see below a number of items of concern that need addressing and working to resolve as part of the change process before implementation. **1**. Meters unable to be reconnected. Where the supply cannot be reconnected on the same day, there is a concern around the need for another scenario variant than what is currently being proposed. The current proposed schedule 14 change only has communication between the CMRM and the supplier. There is especial need for flows to be sent to the appointed MEM too (i.e. all flows apart from the D0136 would also need to go to the appointed MEM). **2.** Customers in vulnerable situations (and reconnection) We would also like to call out particular	1. The CMRM will inform the supplier of danger damage or interference using the appropriate comms method. Due to the urgency with danger, the supplier should make contact with their MEM to attend site. If the CMRM informs the MEM in addition to the supplier, there is a risk that this could be confused with instructions coming from the supplier, particularly in circumstances of danger, resulting in the need for MEMs to create an exception process, so not to action the instruction twice. This was discussed at length by the MEP under R0021 (SIP) and this option was chosen as the preferred solution.

		need and consideration for process surrounding customers in vulnerable situations where they are unable to be reconnected should this scenario arise. **3.** Clarification regarding who bares the cost for complications arising from the Crowded Meter Room MEM carrying out works. Where there is additional works required, further clarification is needed around cost implications for any works that are identified as part of the Crowded Meter Room MEM carrying out any works. Further, whilst there were some high-level results following trials, further details would be welcomed as to findings. **4**. Qualifications and credentials of the Crowded Meter Room MEM's We would appreciate transparency and details surrounding the qualification process of the Crowded Meter Room agents and whether this will be under the current MEM qualification process. Further, we would also advise to ensure adequate governance is in place to ensure work is only completed by qualified agents. **5**. Who will own the initial request to see if it is eligible for this crowded meter room work? Further details surrounding who will own the initial request for eligibility into crowded meter room work – i.e. would MEM instigate to supplier or supplier to MEM, is	2. Before a CMRM can begin any work, the Suppliers will have to confirm to the CMRC that they have shared relevant information from the tenants, specifically about any vulnerabilities that need to be provided for before their supply can be interrupted. The Supplier will not necessarily need to provide specific data about a tenant's vulnerabilities, they will however need to confirm if that tenant cannot be off supply. The CMRM will not de-energise a meter point which is flagged as cannot be off supply. The Supplier and the CMRM should have regard to the Data Protection Principles. If a vulnerability is identified on site where not previously known Schedule 14, paragraph 22.4 states *If, while attending a premises to undertake CMR Works, any vulnerability is identified by the CMRM, it may provide information on Priority Services and will advise the Consumer to contact their Registered Supplier (electricity) or will contact the Registered Supplier on the Consumer's behalf.* In their processes, AHC have requested a point of contact from suppliers for

		needed. There are significant impacts for suppliers regarding readiness if suppliers are envisioned to have the ability to instigate these processes.	scenarios such as this to help mitigate any risks. 3.Liabilities arising from costs and CMR activity, sit under the DCUSA and Alt HAN Co. A further overview of the pilot outcomes has been published with the Final Change Report. 4.The CMRM needs to be a REC accredited MEM. Once a new role code is established, the auditor will be made aware of a status of the CMRM and their ability to use this process. 5. The CMRC will invite Suppliers, landlords, BNOs and DNOs to notify of the existence of CMRs if they wish. This will be available both via a CMR system but also via email.
	Alt HAN Co	AHC notes that there remains some uncertainty over the timing of the necessary changes to allow for the DTN to allow new roles codes. We are assuming this change (which is not specific to R0043) will be made in time for implementation.	Thank you. Since issuing the Consultation on R0043, the BSC have provided an alternative Role Code which will be allocated to the CMRM role, removing the dependency on a new 2CHAR solution.