RETAIL ENERGY CODE

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

CHANGE REPORT

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

CHANGE REPORT	PRELIMINARY
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RESPONSIBLE COMMITTEE	CHANGE PANEL	CHANGE PATH	AUTHORITY DETERMINED
PRIORITY STATUS	MEDIUM	URGENCY	STANDARD

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	03/08/2023

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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

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0043 is **APPROVED** for implementation on 28 June 2024.

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BACKGROUND

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.

The Alternative Home Area Network Company (Alt HAN Co) state 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, 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 proposed 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. Alt HAN Co progressed work to establish a CMRC and a Distribution Connection & Use of System Agreement (DCUSA) Change Proposal (DCP400) was approved, to establish permissions for a CMRM (referred to as Shared MOP in DCUSA) to undertake these types of works, where such work is approved.

The Alt HAN Co Forum will agree a process with Suppliers, to fully deploy solutions to establish a HAN for all alternative HAN candidates (and potentially any corresponding SMETS2 candidates).

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).

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1 PROBLEM STATEMENT

For many MDUs, 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 a 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.

2 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, damage or interference 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.

3 SUMMARY OF ANALYSIS UNDERTAKEN

In collaboration with the DCUSA Working Group for DCUSA Change Proposal 400 (DCP400), the proposed role of the CMRM was explored. The group, having worked through a range of issues, established that the CMRM should have a limited role and only be allowed to undertake a narrow scope of works that would be determined under their accession to DCUSA.

In November 2022, the REC Performance Assurance Board approved a Sandbox application which was to trial resolution of CMRs. The CMR pilot trialled a sample of 50-100 buildings with CMRs in buildings across different parts of Great Britain and involved compact, sprawling and lower high-rise buildings. The trial was to test the effectiveness of a single organisation acting to address connectivity challenges for meters with multiple suppliers.

This involved Alt HAN Co appointing MEMs to deliver these changes, coordinating with affected Suppliers and the Suppliers' agents.

Alt HAN Co surveyed all buildings selected but had expected to physically resolve less than half. The survey activity did not involve any physical works, any governance related to this was managed under the Alt HAN Co Supplier Forum.

For this pilot, Alt HAN Co only worked on the equipment of Suppliers who agreed to participate in the trial and provided them with equivalent information that they would receive if the Suppliers' MEM had completed the work.

Party engagement

- Prior to the trial commencing, a survey was issued by the Code Manager as part of the Sandbox Application, to get wider views on the trial and highlighted that there was general support for the trial amongst respondents.
- Alt HAN Co liaised with individual DNOs/IDNOs and relevant Suppliers regarding the trial and shared with each of them the role specific project requirements. The pilot proceeded with a group of Suppliers who were committed to the duration of the pilot.
- Alt HAN Co appointed three MEMs to participate in the trial.
- DNOs/IDNOs have been involved where the pilot was to be conducted in their region or on their network.
- In addition, monthly progress reports have been provided to the Code Manager and presented to the Responsible Committee for this Change Proposal.

Legal Advice

In August 2022, the Code Manager sought legal advice as to whether Alt HAN Co would be required to accede to the REC in the capacity of a REC Party. The following advice was provided:

1. The right of the Alt HAN Co to do work on the Distributors' networks and the Suppliers' meters is set out in the proposed DCUSA change. The liability regime for damage is also dealt with in the DCUSA change.

2. It would make sense for the DCUSA change to oblige Alt HAN Co to only use a MEM which is approved under the REC.
3. The REC Code Manager needs to:
    a) Identify the concept of a MEM acting on behalf of the Alt Han Co (including potentially under a new market role);
    b) Require such MEM to comply with the REC in respect of all such works;
    c) Determine any additional Market Messages which the MEM needs to send (which may include messages to the supplier's appointed MEM); and
4. There is no requirement for Alt HAN Co to be a party to the REC, because:
    a) The Alt Han Co is liable under the DCUSA (to Distributors and Suppliers) for any damage to physical property caused by the Alt HAN Co (or the MEM acting on behalf of them);
    b) The Alt HAN Co has an Access Agreement for access to the EES;
    c) Payment of Alt HAN Co costs by Suppliers is covered under the Smart Energy Code (SEC); and
    d) The REC PAB can still assure the CMRC MEM and suspend/withdraw such MEM's approval (even though the Alt Han Co is not a REC Party).

On the basis of this advice, the Code Manager worked with DCUSA to confirm that the requirement for the Crowded Meter Room Co-ordinator to employ a REC Accredited MEM as the Crowded Meter Room MEM, was a condition in the DCP400 legal text.

Trial Outcome/Progress

On 15 June 2023 the Alt HAN Forum agreed to extend the trial activity to allow time to complete any outstanding CMR resolutions and update the Alt HAN Business Case for a decision. A subsequent update was provided to the REC PAB outlining an extension request for the REC Sandbox, which was approved on the 25 July 2023.

A summary of learnings from the trial experience to date**,** has been developed by Alt HAN Co, can be found here. This provides an overview of the pilot activity up to 7 July 2023.

4 PROPOSED SOLUTION

This is an enabling change to ensure REC provisions allow for a CMR service.

The Alt HAN Co Forum will agree the arrangements between the CMRC and Suppliers for CMR works to be carried out on behalf of Suppliers who are subject to the Alt HAN arrangements and who have agreed to work being carried out. These commercial and operational arrangements between impacted relevant Suppliers and the Alt HAN Forum are out of the scope of the REC.

Energy Suppliers will be bound to the CMR activity via a new schedule in the Alt HAN Supplier Contract. The change will need discussion and approval from Energy Suppliers via the Forum.

This will define processes and engagement steps to support day-to-day CMR activities. A Requirements Traceability Matrix has been shared with Alt HAN Suppliers and other parties in 2022 and will be revised in accordance with any relevant changes post-trial, to align to the Supplier Contract changes.

The CMR system will be developed by Alt HAN following a decision from the Forum and Suppliers engaged under Alt HAN governance for development, testing and interaction with the system.

The proposed REC solution will:

- Make changes to Schedule 1 – Interpretations, to add new definitions;
- Make changes to Schedule 12 – Data Access. Although Alt HAN Co are already identified as a party with access rights for the purposes of its role generally, an addition is needed to create a link to Alt HAN Co's obligations under section 2G of DCUSA.
- Make changes to Schedule 14 – Metering Operations that set out the processes and rules that the CMRM should follow;
- Add new Scenario Variants for the following Market Messages MM00013/D0002 MM00016/D0126 MM00023/D0135 MM00029/D0136 MM00036/D0139 MM00093/D0179 MM00121/D0221; and
- Create a new User Category for the CMRC and grant access to additional Data Items in EES. The Data Access Matrix will be updated to include additional Data Items (the details of which can be found in the Solution Overview Document).

A Solution Overview document and Frequently Asked Questions document have been created and published to support this Change Proposal and its links to the wider CMR activity under the scope of the Alt HAN Forum.

5 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0043 can be found here.

6 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

6.1 SERVICE PROVIDER IMPACT ASSESSMENTS

An Impact Assessment was issued to the EES Provider on 09 June 2023, to assess the cost and impact of changes to EES systems.

SERVICE PROVIDER – C&C	The EES Provider have confirmed there will be small testing cost should the Change Proposal be implemented. Highlighted that Access will be required for the new CMRC role (category) covering both GUI and API access. However, setting up company groups/users in this category is not in scope for this CR and

	will be progressed with REC Performance Assurance post approval of this change.

6.2 REC PARTY IMPACT ASSESSMENTS

A Party Impact Assessment Request was published by the Code Manager on 23 June 2023, inviting REC Parties to provide their responses by 14 July 2023. There were 11 responses received from Parties, 1 of which was confidential and 1 anonymous. Non-confidential responses received have been published here.

ENERGY SUPPLIERS	• Clarity was not yet available on costs and benefits. • Some respondents felt that the solution is incomplete and therefore an impact assessment could not be fully completed on R0043 in isolation. • Implementation timescales varied, with some respondents indicating that the proposed solution could be implemented in a range of timescales between 6 and 18 months and others indicating they couldn't provide an indicative timescale on the R0043 solution in isolation. • There was a mix of views on whether there were benefits of implementing this change – with some parties recognising that there is currently no other resolution to CMRs, and this change would result in increased numbers of smart meters able to be installed and commissioned, thereby contributing to the Suppliers' mandate. Some respondents felt there may be detriment to suppliers who would face increased costs and activities from its implementation.
DISTRIBUTION NETWORK OPERATORS	• DNOs were broadly supportive of the proposal. • Information on costs have been provided by one DNO, however, this is subject to clarifications on parts of the process. • One DNO provided some views for clarification on the proposed legal text.
METERING EQUIPMENT MANAGERS	• Welcome the proposed REC change. • Required additional information in regard to access to Data Items, which has been responded to.

7 DELIVERY AGAINST CHANGE PROPOSAL PLAN

To date, the activity for this Change Proposal has been completed in line with the Change Proposal Plan.

The Change Proposal Plan can be found here.

8 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

8.1 RISKS AND ISSUES

No.	RISK	NOTES	MITIGATION
R0043.PCR.R1	Currently BSC don't not have any Role Codes to allocate to the CMRM role.	BSC Change is still to be raised – R0132 is to reflect the BSC Change in the REC Data Specification	R0132 has been raised by the BSC reflect changes to the Logical Format of the J0001 (DI50001) 'Market Participant Role Code' data item to Char(2). This needs to be implemented before or with R0043 for a role code to be available for the CMRM.

No.	ISSUE	NOTES	HOW TO PROGRESS
R0043.PCR.I1	In response to the Impact Assessment, Parties have highlighted concerns over lack of visibility of an end-to-end solution. In particular the CMR system is being developed by Alt HAN Co for communications between CMRC and Suppliers.		Alt HAN Co are holding a webinar on the 10 August 2023, for Parties to attend to give an overview/ respond to questions.

9 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	28/06/2024

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

10 BUSINESS CASE ASSESSMENT

Very little cost information was provided during the development of this Change Proposal, and therefore it is difficult to make an assessment of the costs and how they weigh against the benefits.

CMRs pose challenges to industry for the installation of alternative HAN and smart equipment. Suppliers are heavily focused on the roll out of Smart Meters and in some circumstances without these works, the installation and therefore the smart experience/service are only enabled by these works. The approval of this Change Proposal will provide increased efficiencies gained by using a co-ordinated approach. This will help to overcome the current situation whereby smart meter installs to premises, that have CMRs, aren't able to proceed without the intervention of multiple parties and alleviate some of the issues that are currently faced by industry, as well as Consumers.

The Code Manager believes that this Change Proposal will provide access to a safe service, which is provided by qualified operatives who are subject to audit and assurance regimes.

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
CUSTOMER EXPERIENCE	This change will allow more Consumers to access the benefits of smart metering, by enabling a resolution for CMR issues which currently inhibit Consumers from accessing the full range of smart meter benefits on offer including tariffs.
EFFICIENCY	The solution provides a single point of contact for Suppliers to resolve CMRs in MDUs, rather than trying to coordinate with multiple Suppliers and their agents.

11 CASE FOR CHANGE

11.1 AUTHORITY DETERMINATION

The Code Manager believes that R0043 better facilitates the following REC Objectives:

OBJECTIVE	IMPACT TYPE	DESCRIPTION AND JUSTIFICATION
To ensure the REC operates and evolves in a manner that facilitates the achievement of its mission statement[1]	Positive	This change would positively impact the REC's mission to "facilitate the efficient and effective running of the retail energy market, including its systems and processes". It forms part of a coordinated solution to challenges posed by engaging with multiple resolving parties across numerous jurisdictions. 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.

[1] REC Mission Statement

		This will allow Suppliers to efficiently meet the obligations imposed on them by their licence.
To ensure customers interests and data is protected in the operation of the REC	Positive	This change will deliver the relevant communication changes required between systems, ensuring data is protected. It will allow more Consumers to access the benefits of smart metering, by resolving CMR issues.
To drive continuous improvements and efficiencies in the operation of the REC and the central systems and communication infrastructures it governs	Positive	The introduction of a CMRC role and amending existing Market Messages to create a role for the CMRM to send information to Suppliers and DNOS, using Market Messages and making changes to the EES access arrangements for the CMRC, it will ensure that information is safely exchanged.

12 CODE MANAGER'S RECOMMENDATION

Based on the assessment in section 10 and 11 of this report, the Code Manager considers the REC Objectives would be better facilitated by the implementation of this Change Proposal.

The Code Manager recommends that the REC Change Panel recommends the Authority:

- **Approves** the proposed change solution.
- **Approves** the proposed implementation approach.
- **Approves** the proposed implementation date of 28 June 2024

13 CONSULTATION PLAN AND NEXT STEPS

The consultation on this Preliminary Change Report for R0043 will be published on the REC Portal on 18 August and closes on 11 September**.**

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 REC Change Panel to make its determination.

14 APPENDIX

CHANGE PROPOSAL	R0043
LEGAL DRAFTING	Link

CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
SOLUTION OVERVIEW	Solution Overview
FAQs	R0043 - Frequently Asked Questions
TRIAL SUMMARY DOCUMENT	Link
RELATED CHANGE(S)	DCP 400
ANY OTHER DOCUMENTS / LINKS	Requirements Traceability Matrix (RTM) Briefing Pack

RETAIL ENERGY CODE

15 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.
Crowded Meter Room Coordinator	Crowded Meter Room Coordinator means Alt HAN Company Limited (a company incorporated in England and Wales with company number 10002859).
Crowded Meter Room Works	means works which are reasonably required to maximise the available space within a meter room or meter cupboard, in order to enable the installation of Relevant Alt HAN Equipment and/or Smart Metering Systems, including: (a) De-energising an Entry/Exit Point; (b) repositioning meters, cabling, local points of isolation and customer isolation switches; (c) removing and disposing of inhibitive trunking and cable trays; (d) removing and disposing of redundant equipment; and/or (e) Re-energising an Entry/Exit Point that was previously De-energised by or on behalf of the Crowded Meter Room Coordinator.
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.

TERM	DEFINITION
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.
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.

TERM	DEFINITION
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).
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