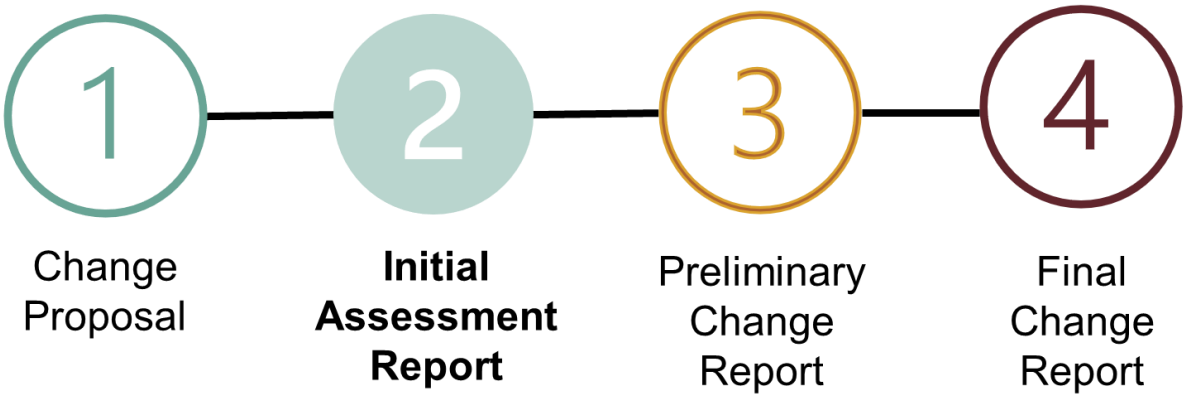
RETAIL ENERGY CODE

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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

R0047 – METERING CODE OF PRACTICE CONSOLIDATION REVIEW

DOCUMENT VERSION	1.1
DATE ISSUED	27/05/2022 (Typographical error corrected 28/09/2022)
DOCUMENT APPROVAL STATUS	APPROVED BY REC CHANGE PANEL
RESPONSIBLE COMMITTEE	CHANGE PANEL

CHANGE OVERVIEW

This Change Proposal seeks to consolidate the current Metering Codes of Practice into a single set of arrangements that is simplified, proportionate and relevant, which can be monitored via a single audit scheme.

	High Impact: Meter Equipment Managers (MEMs), Approved Meter Installers (AMIs), Meter Installers (MIs), Distribution Network Operators and Metering Scheme Auditors
	Medium Impact: Energy Suppliers
	Low Impact: N/A

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LEAD ANALYST
ANN PERRY
EMAIL

1 SUMMARY

Prior to the implementation of the Retail Energy Code (REC) Version 2.0, which gave effect to Retail Code Consolidation, on the 01 September 2021, metering activities were covered by five separate Metering Codes of Practice (CoP):

- Approved Meter Installer Code of Practice (AMICoP)
- Meter Asset Manager Code of Practice (MAMCoP)
- Meter Operator Code of Practice Agreement (MOCoPA)
- Automated Meter Reader Service Provider Code of Practice (ASPCoP)
- Smart Meter Installation Code of Practice (SMICoP).

These five CoP were transitioned into the REC on a largely 'as is' basis. The CoPs are now known as:

- Gas Metering Code of Practice (MCoP): This CoP consolidated the metering regimes for AMICoP and MAMCoP.
- Electricity Metering Code of Practice (MOCoP): This CoP replaced the MOCoPA accreditation.
- Automated Meter Reading Service Provider Code of Practice (ASPCoP).
- Smart Metering Installation Schedule (SMICoP).

Each of the current CoPs has a separate scheme auditor that awards accreditation to Meter Equipment Managers, Approved Meter Installers and Meter Installers. There are currently four different auditors that undertake these activities across the different schemes. This could mean that a REC Party may require multiple separate accreditations and audits.

This approach is time consuming and costly, therefore, in line with RECCo's objectives on simplicity and efficiency, RECCo is completing a Metering Code of Practice Consolidation Review[1].

This Change Proposal seeks to deliver the outcomes of the RECCo review; to consolidate the CoPs into a single set of metering arrangements within the REC, with a single audit scheme and audit service provider delivering the accreditation.

2 PROBLEM STATEMENT

The current metering arrangements, with separate Metering Codes of Practice, contains duplication and inefficiencies. There are currently four different auditors that undertake accreditation and audit activities across the different schemes. This could mean that a REC Party may require multiple separate accreditations and site audits, resulting in unnecessary operational impacts and costs.

[1] https://www.retailenergycode.co.uk/metering-code-consolidation/

3 USER STORIES

REF.	USER STORIES
MARKET PARTICIPANT USER STORIES	
M1	As a DNO, MEM, AMI or MI, I want all CoP obligations to be clear and transparent, to ensure all obligations placed upon my organisation and operatives are understood and can be met in the most efficient way.
M2	As a MEM, AMI or MI, I want metering accreditation and audit activity to be streamlined and duplication removed, so that efficiency is increased, and unnecessary costs reduced.
M3	As an Energy Supplier, I want to be confident that my Appointed agents are compliant with all relevant CoP to ensure the safety of my Consumers.
M4	As RECCo, I want the metering scheme accreditation and audit arrangements to be managed and delivered in a cost efficient, effective and consistent approach, to ensure the arrangements deliver against the RECCo strategic aims.

4 IMPACTS

REC PARTIES AND SERVICE USERS
Metering Equipment Managers
Distribution Network Operators
Approved Meter Installers
Meter Installers

REC DOCUMENTS / PRODUCTS
Gas Metering Code of Practice
Meter Operation Code of Practice
Automated Meter Reader Service Provider Code of Practice
Smart Metering Installation Schedule
Metering Accreditation Schedule
Interpretations and Definitions Schedule

RECCO AND REC CODE MANAGER
RECCo

REC SERVICE PROVIDERS
Metering Scheme Auditors

This change will impact REC Parties obligated under each of the current Codes of Practice and the Metering Accreditation Schedule. Changes are likely to be seen to the Interpretations and Definitions Schedule to reflect the outcome and consolidation.

This change will also impact the REC Baseline Statement, which is a Category 3 document. The change to the REC Baseline Statement will be aligned with this Change Proposal, however, it will be progressed as a separate Category 3 Change Proposal.

The specific changes to each of the impacted products will be defined as part of the RECCo Metering Code of Practice Consolidation Review.

4.1 CROSS CODE IMPACTS

No cross-code impacts have been identified for this Change Proposal

5 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	SELF-GOVERNANCE
RESPONSIBLE COMMITTEE	CHANGE PANEL

As this Change Proposal is seeking to consolidate Category 1 and 2 documents into one new Code of Practice, it is appropriate for Change Panel to be Responsible Committee.

6 PRIORITY STATUS AND URGENCY

PRIORITY STATUS	HIGH
URGENCY	STANDARD

PRIORITISATION MATRIX

Significance	Score	Weighting
Legal/Regulatory Compliance	1	30
Strategic Direction	3	20
Cost Benefits / Value	3	10
Consumer Impacts	1	30
Operational Efficiency	2	10

Urgency				
3	N/A	13	23	33
2	02	12	22	32
1	01	11	21	31
0	00	10	20	N/A

Significance

Weighted Significance Score	2
Urgency	2
Overall Priority Score	**22**

Effort	2 - High

Priority Score	Priority Status
23 - 33	Critical
13 - 22	High
11 - 21	Medium
00 - 10	Low

PRIORITY STATUS
High

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

Significance:

Legal/Regulatory Compliance – a score of 1 as this change will simplify the metering arrangements, setting out REC Party obligations in a more transparent way, which will in turn enable REC Parties to better understand and deliver their obligations under the REC.

Strategic Direction – a score of 3 as the implementation of this Change Proposal directly impacts the delivery of the RECCo strategic aim to consolidate, simplify and maintain retail governance arrangements.

Cost Benefits/Value – a score of 2 to reflect the overall reduction in costs associated with the accreditation and auditing arrangements, which will be seen through the implementation of this Change Proposal.

Consumer Impacts – a score of 1 to reflect that although no specific Consumer impacts have been defined so far, it is expected that through the simplification of the code, the removal of duplication and the assessment of validity of the current arrangements, positive Consumer outcomes will be achieved. This will be validated following the analysis and drafting of the consolidated arrangements.

Operational Efficiency – a score of 2 to reflect the operational benefits that will be seen by REC Parties through streamlined accreditation and auditing arrangements.

Urgency:

This Change Proposal has been given an urgency score of 2 to reflect the need for it to be progressed with a timetable that will enable the new Code of Practice and auditor to be in place ahead of the next scheme year in April 2023.

7 SUMMARY OF CHANGE PROPOSAL PLAN

No analysis or solution development is required as part of the Change Proposal Plan, this will be completed by RECCo as part of the Metering Code of Practice Consolidation Review project. Engagement with the Metering Expert Panel, to guide and validate the new arrangements, will be completed as part of the RECCo led project

A standard 15 Working Day REC Party Impact Assessment will be conducted, to understand the consequences and any costs that may result from the implementation of the solution developed by RECCo.

Following the Preliminary Assessment, a 15 Working Day Consultation period has been included in the plan. This will shape the Final Change Report which will be presented to the Change Panel for a decision on 15 November 2022.

	FROM	TO
ANALYSIS AND SOLUTION DEVELOPMENT	08/06/2022	28/07/2022
IMPACT ASSESSMENT PERIOD	29/07/2022	19/08/2022
PRELIMINARY CHANGE REPORT ISSUED	02/09/2022	02/09/2022
RESPONSIBLE COMMITTEE REVIEW (EX-COMMITTEE)	13/09/2022	13/09/2022
CONSULTATION PERIOD	16/09/2022	07/10/2022
FINAL CHANGE REPORT ISSUED	04/11/2022	04/11/2022
RESPONSIBLE COMMITTEE DECISION	15/11/2022	15/11/2022

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8 GLOSSARY

TERM	DEFINITION
Accreditation	means the process by which a Metering Equipment Manager is recognised as fulfilling the requirements of one or more Metering Codes of Practice, which may include an audit process in accordance with the Metering Accreditation Schedule. "Accredited", “Approved” and similar expressions shall be interpreted accordingly.
Appointed	means, in respect of a Supplier Agent and for a particular RMP, that the Supplier Agent is recorded against that RMP under this Code (or the BSC or UNC, as applicable); or, in respect of a period of time, that the Supplier Agent is or was so recorded during that period. "Appoint" and "Appointment" shall be interpreted accordingly.
Automated Meter Reading Service Providers Code of Practice for Gas Meter (ASPCoP)	means the Code of Practice of that name against which relevant service providers are assessed, pursuant to the Metering Accreditation Schedule.
Code of Practice for Gas Metering Equipment Managers and Approved Meter Installers (MCoP)	means the Metering Code of Practice against which gas MEMs and Meter Installers are assessed, pursuant to the Metering Accreditation Schedule.
Consumer	means any person supplied (or seeking a supply) of Energy at an RMP (whether or not that person also exports or is seeking to export electricity at an RMP).
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier
Meter Operative	means an employee, agent or subcontractor appointed by the MEM.
Metering Accreditation Schemes Schedule	means REC Schedule 15
Metering Equipment Manager (MEM)	means, as applicable, either: (a) for electricity, the Meter Operator Agent (as defined in the BSC) Appointed by an Electricity Supplier; or (b) for gas, the Meter Asset Manager (as defined in the UNC) Appointed by the Gas Supplier.
Metering Operation Code of Practice (MOCoP)	means the Meter Operator Code of Practice, against which relevant MEMs are assessed pursuant to the Metering Accreditation Schedule.
Qualification and Maintenance Schedule	means REC Schedule 9.
Retail Energy Code (REC)	means this Code, including its Schedules and the Technical Specification, maintained pursuant to the electricity supply licences granted under the Electricity Act 1989 and the gas supply

	licences granted under the Gas Act 1986, as such code is modified from time to time in accordance with its provisions
Smart Meter Installation Schedule	means REC Schedule 16