RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0062 REMOVAL OF ERDA METERINGPOINTENERGYFLOW CHANGE RESTRICTION

On 22 December 2023 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for **R0062 Removal of ERDA meteringPointEnergyFlow change restriction**.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	08/02/2024
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Harriet Truss

DATE CONSULTATION ISSUED	22/12/2023
RESPONSE DEADLINE	23/01/2024

Question 1:	Do you agree the proposed solution resolves the problem statement? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	Yes.	Noted, thank you.
Utilita Energy Limited (Energy Supplier)	Yes, Utilita agree with the proposed solution.	Noted, thank you.
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Noted, thank you.
SSE Energy Supply Ltd (Energy Supplier)	Yes, we agree the proposed solution resolves the problem.	Noted, thank you.
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we believe that the proposed solution resolves the problem statement.	Noted, thank you.

Question 2:	Do you agree with the proposed legal text? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	Yes.	Noted, thank you.
Utilita Energy Limited (Energy Supplier)	Yes, Utilita agree with the proposed legal text changes to Schedule 27, section 6.2	Noted, thank you.
National Grid Electricity Distribution (Distribution Network Operator)	Yes – there is a clear removal of the restriction.	Noted, thank you.
SSE Energy Supply Ltd (Energy Supplier)	Yes.	Noted, thank you.
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we agree with the legal text.	Noted, thank you.

Question 3:	Do you agree with the proposed implementation date and implementation techniques? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	Yes.	Noted, thank you.
Utilita Energy Limited (Energy Supplier)	Yes, agreed.	Noted, thank you.
National Grid Electricity Distribution (Distribution Network Operator)	We agree with the proposed date & approach.	Noted, thank you.
SSE Energy Supply Ltd (Energy Supplier)	Yes.	Noted, thank you.
Scottish Power Energy Networks (Distribution Network Operator)	We are in agreement with the implementation data and techniques.	Noted, thank you.

Question 4:	Do you support that this change should be implemented, despite the risk that the lifted restriction may not be continued post MHHS go-live?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	Yes.	Noted, thank you.
Utilita Energy Limited (Energy Supplier)	Utilita oppose plans to revert to the previous process post MHHS go-live as there is a risk of confusion which may result in errors being made.	Noted, thank you. A Change Request has been raised to the MHHS Programme to keep this process as part of the enduring solution.
National Grid Electricity Distribution (Distribution Network Operator)	We support this implementation – this will allow for corrective activities (should they be necessitated) The implications of termination of creation of a new RMP have been outlined in previous responses to Impact Assessments – as such the MHHS Programme should allow for a CR to amend the legal texts and for this to be enduring under the MHHS design.	Noted, thank you. A Change Request has been raised to the MHHS Programme to keep this process as part of the enduring solution.
SSE Energy Supply Ltd (Energy Supplier)	Yes. Whilst we believe that the ability to change Metering Point Energy Flow more than once should exist after MHHS, we believe even a short-term change will assist with clearing errors which could occur during the creation of Smart Export MPANs required for MHHS.	Noted, thank you. A Change Request has been raised to the MHHS Programme to keep this process as part of the enduring solution.
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we believe that this is critical to the accuracy of Settlement and the customer experience.	Noted, thank you.

Question 5:	Do you support that an MHHS Programme Change Request should be submitted to enable the lifting of the restriction to be maintained post MHHS go-live?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	Yes.	Noted, thank you.
Utilita Energy Limited (Energy Supplier)	Yes, Utilita supports an MHHS Programme Change Request submission to maintain the lifting of restriction post MHHS go-live.	Noted, thank you.
National Grid Electricity Distribution (Distribution Network Operator)	Yes – as above and outlined in the Preliminary Change Report there are risks relating to settlement error. This change will minimise this risk and as such a Programme CP should be raised.	Noted, thank you.
SSE Energy Supply Ltd (Energy Supplier)	Yes. SSE believe the benefit of changing Metering Point Energy Flow more than once will still exist after MHHS and so there is value in raising the MHHS Programme Change Request. This should allow the MHHS Programme to develop any processes necessary to resolve the Settlement issues which may be caused by the data item change. Failure to implement this change after MHHS will mean Settlement issues caused by raising a new RMP, and disconnecting the old, will remain unaddressed.	Noted, thank you.
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we are supportive of the MHHS Programme raising a CR to lift this restriction post MHHS Go-Live.	Noted, thank you.

Question 6:	Based on the Business Case Assessment and Case for Change, do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 12 April 2024.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	Yes.	Noted, thank you.
Utilita Energy Limited (Energy Supplier)	Yes, agreed.	Noted, thank you.
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Noted, thank you.
SSE Energy Supply Ltd (Energy Supplier)	Yes.	Noted, thank you.
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we are supportive of this implementation date.	Noted, thank you.

Question 7:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	We support the proposal. The current REC drafting restricts more than one change to the EDI unnecessarily as the CSS does not validate the data item. In doing so, it creates unnecessary impacts to the customer, including the creation of a new MPAN, new rates etc or adversely if a new MPAN is not created, the customer is charged incorrectly. The creation of a new MPAN creates additional workload for DNOs and Suppliers and increases the risk of theft in conveyance where a customer does not agree a new supply contract.	Noted, thank you.
Utilita Energy Limited (Energy Supplier)	Nothing to add.	Noted, thank you.
National Grid Electricity Distribution (Distribution Network Operator)	N/A	-
SSE Energy Supply Ltd (Energy Supplier)	SSE strongly believe this process should be for exceptional use only. Any incidence of correcting the Metering Point Energy Flow beyond twice should require a detailed investigation by the DNO and relevant suppliers.	Noted, thank you. The Code Manager supports that Suppliers and DNOs should only be progressing corrections where a robust assessment has been made that the risks outweigh those of terminating the RMP. This is reflected in assumption R0062.IA.A003 in the Final Change Report. No changes have been

		made to the solution to make this a reporting requirement.
Scottish Power Energy Networks (Distribution Network Operator)	No other comments.	Noted, thank you.