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CHANGE PROPOSAL PLAN

R0064 – CREATING A METER OPERATOR AGENT AND MOCOP INSTALLER

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RESPONSIBLE COMMITTEE	CHANGE PANEL	CHANGE PATH	SELF GOVERNANCE

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	10/11/2023

LEAD CHANGE ANALYST



Jonathan Holland

Click to send an email

02038 909431

CHANGE OVERVIEW

This Change Proposal seeks to clearly differentiate the metering obligations, and the associated qualification obligations, set out in the REC for the various electricity metering service providers.

RETAIL ENERGY CODE

KEY MILESTONES

	PROPOSED DATES	
	FROM	TO
SOLUTION DEVELOPMENT	completed	completed
SERVICE PROVIDER IMPACT ASSESSMENT	completed	completed
DRAFT LEGAL TEXT CHANGES (INCLUDING LEGAL REVIEW)	14/08/2023	15/09/2023
SERVICE PROVIDER IMPACT ASSESSMENT	18/09/2023	13/10/2023
PARTY IMPACT ASSESSMENT	23/10/2023	03/11/2023
PRELIMINARY CHANGE REPORT ISSUED	10/11/2023	10/11/2023
RESPONSIBLE COMMITTEE REVIEW	21/11/2023	21/11/2023
CONSULTATION	24/11/2023	15/12/2023
FINAL CHANGE REPORT ISSUED	12/01/2024	12/01/2024
RESPONSIBLE COMMITTEE DECISION	23/01/2024	23/01/2024
APPEAL WINDOW CLOSURE	23/01/2024	06/02/2024

RETAIL ENERGY CODE

1 RE-BASELINE ACTIVITY

This Change Proposal Plan requires re-baselining to enable comments received from Service Provider Impact Assessment activity to be addressed and where needed, amendments to be made to the draft legal text. Amendments made to the draft legal text will then be subject to a legal review.

It had been assumed previously that introducing two new categories of electricity MEM would provide sufficient clarity to address the problem statement. This would see the introduction of two new roles to the REC:

- Meter Operator Agent (MOA) – the Appointed MEM that is ultimately accountable for the on-site metering activity and the sending of Market Messages.

- Electricity Metering Operative (EMO) – is the qualified MEM responsible for the on-site metering activity.

However, through the solution development phase and a full review of the roles and responsibilities of MEMs for both Gas and Electricity, it has become clear that additional time is needed to ensure that we have fully addressed the problem statemen and to provide sufficient clarity for the four new REC roles:

MEM – Metering Equipment Manager (collective term for Appointed MAM and MOA) - means, as applicable, either: (a) for electricity, a Meter Operator Agent (MOA); or (b) for gas, a Meter Asset Manager (MAM).

> **Meter Asset Manager (MAM)** - means an entity which has Qualified in that role under the Qualification and Maintenance Schedule. Where used in respect of a particular Supply Meter Point, it means the MAM Appointed by a Gas Supplier in accordance with the Metering Operations Schedule. The MAM is accountable for the installation, replacement, repair and maintenance of gas Metering Equipment by a Qualified AMI.
>
> **Meter Operator Agent (MOA)** – means an entity which has Qualified in that role under the Qualification and Maintenance Schedule. Where used in respect of a particular Metering Point, it means the MOA Appointed by an Electricity Supplier in accordance with the Metering Operations Schedule. The MOA is accountable for the installation, replacement, repair and maintenance of electricity Metering Equipment by a Qualified EMO.

Approved Meter Installer (AMI) - an entity which is approved (or which is seeking approval) as such under the Metering Accreditation Schedule, being the entity, which undertakes the installation, replacement, repair and maintenance of gas Metering Equipment.

Electricity Metering Operative (EMO) – an entity which is approved (or which is seeking approval) as such under the Metering Accreditation Schedule, being the entity, which undertakes the installation, replacement, repair and maintenance of electricity Metering Equipment.

Further time has been incorporated to enable development and assessment of the required changes and carry out the necessary legal review. When possible, activity will be completed ahead of the planned timelines.

	APPROVED DATES		PROPOSED DATES	
	FROM	TO	FROM	TO
SOLUTION DEVELOPMENT	19/06/2023	14/07/2023	**completed**	**completed**
SERVICE PROVIDER IMPACT ASSESSMENT	14/07/2023	11/08/2023	**completed**	**completed**
DRAFT LEGAL TEXT CHANGES (INCLUDING LEGAL REVIEW)	N/A	N/A	**14/08/2023**	**15/09/2023**
SERVICE PROVIDER IMPACT ASSESSMENT	N/A	N/A	**18/09/2023**	**13/10/2023**
PARTY IMPACT ASSESSMENT	25/08/2023	18/09/2023	**23/10/2023**	**03/11/2023**
PRELIMINARY CHANGE REPORT ISSUED	06/10/2023	06/10/2023	**10/11/2023**	**10/11/2023**
RESPONSIBLE COMMITTEE REVIEW	17/10/2023	17/10/2023	**21/11/2023**	**21/11/2023**
CONSULTATION	20/10/2023	10/11/2023	**24/11/2023**	**15/12/2023**
FINAL CHANGE REPORT ISSUED	24/11/2023	24/11/2023	**12/01/2024**	**12/01/2024**
RESPONSIBLE COMMITTEE DECISION	05/12/2023	05/12/2023	**23/01/2024**	**23/01/2024**
APPEAL WINDOW CLOSURE	05/12/2023	19/12/2023	**23/01/2024**	**06/02/2024**

2 SCOPE

2.1 IN SCOPE

This document details the plan for analysis, solution development, assessment, and the consultation plan for this Change Proposal.

2.2 OUT OF SCOPE

This Change Proposal is looking to clarify the obligations imposed on the Metering Equipment Manager (MEM), based on the metering activity being carried out. It is not looking to introduce new responsibilities or obligations for the MEMs.

3 REQUIRED ACTIVITIES AND STAKEHOLDER ENGAGEMENT

3.1.1 CROSS CODE ENGAGEMENT

No consequential impacts on other codes have been identified for this Change Proposal, however as the solution is developed the Cross Code Steering Group will be updated.

The Change Proposal supports and is of interest to the Market-wide Half Hourly Settlement (MHHS) Programme. The MHHS Programme is currently developing the requirements for how qualification and maintenance will be managed under the Retail Energy Code (REC) and

Balancing and Settlement Code (BSC) to support the MHHS operating model. This is being managed under Performance Assurance Working Group (PAWG). The Code Manager will ensure that the MHHS Programme is kept informed so that changes being made under this Change Proposal can be taken into consideration during development of the MHHS requirements under the PAWG and during the overall code drafting activity.

3.1.2 ANALYSIS AND SOLUTION DEVELOPMENT

The need for this Change Proposal has been identified during REC Performance Assurance operational activities. The solution has not been fully defined, therefore a period of further solution analysis and development will be required. During this phase, the Code Manager will define the full requirements and develop a solution that delivers the required clarity for the different electricity metering service providers.

The Code Manager will seek informal views during solution development from wider industry Subject Matter Experts and via industry forums, including the Association of Meter Operators and the Electricity Operational Metering Forum.

3.1.3 IMPACT ASSESSMENT

This plan allows for a standard 25 Working Day Service Provider impact assessment by the REC Code Manager, due to the likely impacts on products and processes for market entry, Performance Assurance and stakeholder engagement.

As part of the analysis phase, access to data in the Electricity Enquiry Service (EES) will be assessed to ensure permissions are appropriate. If the conclusion of this assessment is that an update to the EES User Categories in the EES system is required, this will be managed as part of the release activity. No cost will be expected from the EES Provider for such changes following the phased implementation of R0022 – Amendments to the Data Access Matrix. The technical changes under R0022 will deliver new configuration for management of EES User Categories in the EES system which mean this type of change will become part of standard operational delivery. Implementation of the EES system changes is planned for April 2023.

We will validate and assess the proposed solution(s) through Party impact assessments, targeted at MEMs. The plan also allows for a standard 15 Working Day period. Time has been allowed in the Change Proposal Plan for solution refinement following REC Service Provider and REC Party impact assessments of the proposed solution(s).

3.1.4 PRELIMINARY CHANGE REPORT DEVELOPMENT AND CONSULTATION

A preliminary assessment will be carried out following the impact assessments. This will propose a solution developed by the Code Manager, using the impact assessment responses as well as presenting the case for change and Code Manager's recommendation. At this stage we expect that a standard 15 Working Day period for industry consultation will be sufficient. This will be validated once the solution has been assessed and developed.

3.1.5 FINAL CHANGE REPORT

Time has been included in the plan to complete a final assessment, prior to publishing the Final Change Report for decision. The assessment will include reviewing consultation responses and assessing any impacts that may affect the Final Change Report and Code Manager's recommendation.

3.2 RAID

3.2.1 RISKS AND ISSUES

No risks or issues have been identified that impact this plan.

3.2.2 ASSUMPTIONS AND DEPENDENCIES

REF.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
R0064.CPP.A001	There will be no changes to the data specification. The use of MEM will be maintained.		To be validated as part of the solution development phase
R0064.CPP.A002	An EES system change to reflect a change in EES User Categories and associated data access will not incur cost.		To be validated as part of the solution development phase
R0064.CPP.A003	No new obligations will be introduced under this CP		To be validated as part of the solution development phase

REF.	DEPENDENCY	NOTES	STATUS
R0064.CPP.D001	The changes made under this Change Proposal will need to be taken into consideration by the REC drafting activity under the MHHS Programme.	The MHHS Programme will be kept informed of developments under R0064 via the Cross Code Advisory Group (CCAG) Horizon Scanning log and Code Drafting Working Group	Open
R0064.CPP.D002	MHHS Qualification and Maintenance	The MHHS Programme will be kept informed of developments under R0064 via the CCAG Horizon Scanning log and PAWG	Open

R0064.CPP.D003	Implementation is required ahead of MHHS go live	The MHHS programme plan is currently being revised, with the new plan to be issued for consultation in December 2022. It is therefore not possible to specify a date by which this change is required at this time.	Open