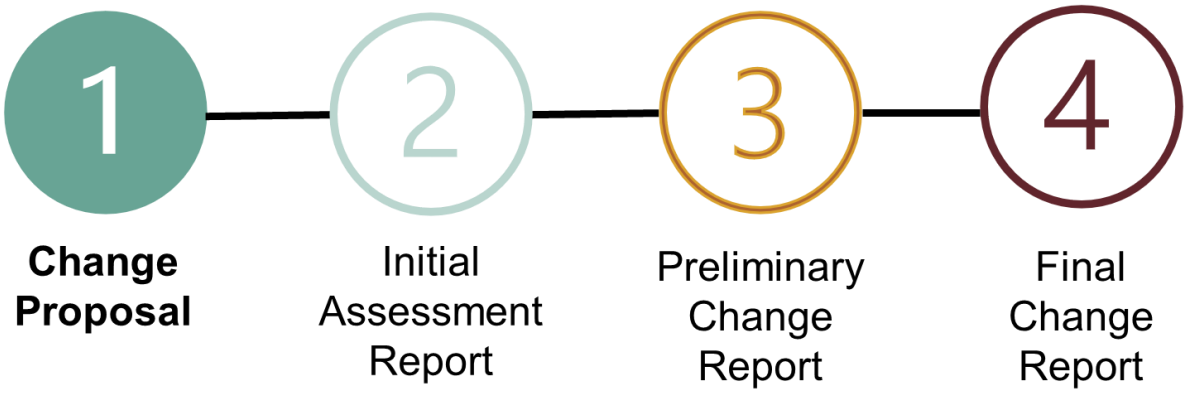
RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

CHANGE PROPOSAL FORM (COPY)

PLEASE NOTE: THIS IS A COPY FOR INFORMATION ONLY. TO SUBMIT A CHANGE PROPOSAL PLEASE USE THE ONLINE FORM ON THE REC PORTAL.



PURPOSE:	This is a copy of the Change Proposal Form submitted by the Proposer on the REC Portal.
NOTES:	The information in this form is subjective to the views of the Proposer at the time of submitting the form, and prior to formal assessment by the Code Manager. The solution will not be finalised until the publication of the Preliminary Change Report.
NEXT STEPS:	The Code Manager will complete an initial assessment of the Change Proposal and determine if additional development or assessments is required. The Initial Assessment Report will be published with the Change Proposal Plan and reviewed by the Change Panel.

RETAIL ENERGY CODE

1 PERSONAL DETAILS

PROPOSER NAME *(Mandatory)*	COLETTE BALDWIN
COMPANY *(Optional)*	REC CODE MANAGER
COMPANY TYPE *(Optional)*	CODE MANAGER
TELEPHONE NUMBER *(Optional)*	0207 770 6785
EMAIL ADDRESS *(Mandatory)*	LINK

2 CHANGE PROPOSAL SUMMARY

CHANGE PROPOSAL TITLE *(Mandatory)*	Registration of Smart Export Guarantee (SEG) Sites
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	The Smart Export Guarantee (SEG) is an obligation set by the Department for Business, Energy and Industrial Strategy (BEIS) for licensed electricity Suppliers to offer a tariff to small-scale low-carbon Generators and make payments directly for exported electricity. The SEG came into force on 1 January 2020 and introduced the need to register and settle Export Meter Point Administration Numbers (MPANs), in accordance with the Balancing and Settlement Code (BSC) arrangements, for generators with capacity up to 5 Megawatts (MW). There are a number of scenarios arising which question whether these existing processes established for the import market are fit for purpose for the export market and for the use of shared smart Meters. The REC should allow for registration of export at smaller scale generation (i.e. below 30kW) to ensure that the SEG scheme is workable and therefore the issue with MEM appointment for SEG sites needs to be investigated. This market is only going to increase following the introduction of the SEG, the continued roll out of Smart Meters capable of recording export, and as we move towards mandatory half-hourly settlement of all consumer energy.

WHAT IMPACT IS THIS HAVING? *(Mandatory)*	The existence of the export MPAN and the associated Meter will be notified by the Supplier to the MOA, which is not usual practice. It is not evident that processes such as the New Connections and Switching processes, are fit for purpose to support SEG MPANs. This creates a risk that export energy for these MPANs will be registered incorrectly, or not at all, which may impact the Supplier's ability to correctly settle the Export MPANs. A further relates to the Suppliers having to appoint the same MEM for both import and export MPANs where there is shared Metering Equipment. This was introduced to avoid the complication and potential duplication that could arise from having separate MEMs serving one shared import/export Meter. However, these requirements were introduced when there was little or no domestic export market, and before the installation of smart Meters. Where the Supplier is not the import Supplier and as a result is unlikely to have an ongoing commercial contract with the existing import MEM, appointment of the export MEM is proving time consuming and in some cases is not happening for a number of months. The REC does not require the existing import MEM to either engage with the Supplier or to accept the request for appointment. MEMs are therefore rejecting appointments for export Meters. Without an appointed MEM, data relating to export energy cannot be processed into the Settlements process. Elexon estimated in their Issue 91 Report, that at MPAN level, risk is nominal, with circa 1 million FiT customers plus new EVs the risk is significantly increased
WHAT OUTCOMES DO YOU CONSIDER ARE NEEDED TO ACHIEVE AN EFFECTIVE SOLUTION? *(Mandatory)*	Amendments to the REC need to be made for Export Metering Systems to be registered. Notification of the Export MPAN to the Export Supplier's MEM needs to be progressed. A change to Market Message - MM00065 (Data Transfer Catalogue Data Flow D0155 'Notification of Meter Operator or Data Collector Appointment and Terms') is required to notify the Non Half-Hourly Meter Equipment Manager (NHH MEM) that they are being appointed to an Export MPAN;

IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE CHANGE PROPOSAL THAT WOULD BE USEFUL? *(Optional)*	BSC Issue 91 Working Group examined these issues in December 2020, and their workgroup papers and Issue Report published by Elexon would be helpful to understand the issues and suggested solutions. The Issue Workgroup looked at the BSC Procedures related to this activity - BSCP504 and BSCP514. Arrangements in BSCP514 have now transitioned to the Retail Energy Code (REC). This market is only going to increase following the introduction of the SEG, the continued roll out of smart Meters capable of recording export, and as we move toward potential mandatory settlement of half hourly data for all consumers.

3 CONSUMER IMPACTS

WHICH CONSUMER TYPES WILL BE IMPACTED BY THIS CHANGE PROPOSAL? *(Mandatory)*	☒ Electricity ☒ Gas ☒ Domestic Prepayment ☒ Domestic Credit ☒ Microbusiness ☒ Small and Medium Enterprise (SME) ☐ Industrial and Commercial (I&C) ☐ Other (please specify in the Additional information box below)
WHAT IMPACT WILL THIS CHANGE PROPOSAL HAVE FOR THESE CONSUMERS? *(Mandatory)*	☒ Switching experience ☒ Billing accuracy ☐ Trust and confidence ☐ Safety ☐ Security of supply ☐ Ability to pay ☐ On site experience ☐ Other (please provide details in the Additional information box below)
ADDITIONAL INFORMATION *(Optional)*	

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4 CODE IMPACTS

Does this Issue relate to or impact:

THE REC OR REC SCHEDULES? *(Optional)*	☐ Main Body ☐ Interpretations and Definitions Schedule ☐ Transition Schedule ☐ Accession Agreement ☐ Company Governance Schedule ☐ Change Management Schedule ☐ Performance Assurance Schedule ☐ Qualification and Maintenance Schedule ☐ Market Exit Schedule ☐ Charging Methodology Schedule ☐ Prepayment Arrangements Schedule ☒ Central Switching Service Schedule ☐ Data Access Schedule ☐ Energy Theft Reduction Schedule ☒ Transfer of Consumer Data Schedule ☒ Metering Operations Schedule ☐ Metering Accreditation Schedule ☐ Smart Meter Installation Schedule ☐ Secure Data Exchange Schedule ☐ Green Deal Arrangements Schedule ☒ Registration Services Schedule ☐ Related Metering Points Schedule ☐ Address Management Schedule ☐ Switching Data Management Schedule ☐ RMP Lifecycle Schedule ☐ Switching Service Management Schedule ☐ Resolution of Consumer Facing Switching and Billing Issues Schedule ☐ SPAA Transition Schedule ☐ MRA Transition Schedule ☐ Unbilled Energy Code of Practice ☐ Gas Metering Code of Practice ☒ MOCoPA ☐ ASPCoP ☐ Change Panel Terms of Reference ☐ Performance Assurance Board Terms of Reference

ADDITIONAL INFORMATION *(Optional)*	

THE DATA SPECIFICATION? *(Optional)*	☒ Data Item Catalogue ☒ Market Message Catalogue ☐ Data Access Matrix ☐ Standards Definition
ADDITIONAL INFORMATION *(Optional)*	

CENTRAL SYSTEMS OR REC SERVICES? *(Optional)*	☐ Electricity Enquiry Service ☐ Central Data Service Provider Further Services ☐ Secure Data Exchange Service ☐ Green Deal Central Charging Database ☒ Central Switching Service (CSS) ☐ CSS Certificate Authority ☒ Switching Operator ☐ Gas Retail Data Service ☐ Electricity Retail Data Service ☐ Gas Enquiry Service ☐ Energy Theft Tip Off Service (ETTOS)
ADDITIONAL INFORMATION *(Optional)*	

REC PARTIES AND/OR MARKET PARTICIPANTS? *(Optional)*	☒ Energy Suppliers ☒ Distribution Network Operators ☐ Gas Transporters ☒ Metering Equipment Managers ☒ DCC ☐ Shippers ☒ Data Collectors ☒ Data Aggregators ☐ Green Deal Providers ☐ Green Deal Finance Parties

	☐ Meter Asset Providers ☐ AMR Service Providers ☐ EES Users ☐ GES Users ☐ GDCC Users ☐ Other (please provide details in the Additional Information box)
ADDITIONAL INFORMATION *(Optional)*	

OTHER INDUSTRY CODES? *(Optional)*	☒ BSC ☐ DCUSA ☐ SEC ☐ UNC ☐ IGT UNC
ADDITIONAL INFORMATION *(Optional)*	There will need to be processes in place to enable Export Registration, and this will need to be in place ready for the Market-Wide Half-Hourly Settlement arrangements.

DOES THIS CHANGE PROPOSAL IMPACT A SIGNIFICANT CODE REVIEW? *(Optional)*	No
ADDITIONAL INFORMATION *(Optional)*	There may already be sandbox trials looking at this issue.

5 CHANGE PROGRESSION

DO YOU BELIEVE THIS CHANGE PROPOSAL MEETS THE CRITERIA FOR 'URGENCY' AND SHOULD BE PROGRESSED	No

UNDER AN URGENT TIMETABLE? **IF SO, PLEASE PROVIDE JUSTIFICATION?** *(Optional)*	
ARE THERE ANY REQUIRED TIMESCALES FOR THE DEVELOPMENT OR IMPLEMENTATION OF THIS CHANGE PROPOSAL? *(Optional)*	None
ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THE CHANGE PROPOSAL WHICH MAY IMPACT ITS PRIORITY OR PROGRESSION TIMETABLE? *(Optional)*	A potential change may be required to related BSC processes impacted by this change
DOES THIS CHANGE PROPOSAL RELATE TO AN EXISTING OR PREVIOUS CHANGE PROPOSAL? *(Optional)*	BSC Issue 91

6 ATTACHMENTS

ATTACH/PROVIDE ANY SUPPORTING DOCUMENTS TO BE SUBMITTED WITH THE FORM	Issue 91 Report