RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0067 – INTRODUCTION OF CSS REFRESH FUNCTIONALITY

On 14 April 2023 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0067.

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
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RESPONSIBLE COMMITTEE	TECHNICAL EXPERT PANEL
LEAD ANALYST	ELISE HANDY

DATE CONSULTATION ISSUED	14/04/2023
RESPONSE DEADLINE	28/04/2023

Question 1:	Do you agree that the proposed solution addresses the problem statement? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Wales and West Utilities (Gas Transporter)	The solution addresses the problem statement as it enables a way to retrieve missing messages, however we believe it does reflect the intended solution in a clear way. The REC change does not align to the UNC modification 0836S - Resolution of Missing Messages following Central Switching Service implementation and integration with REC Change R0067 and this may result in the solution being developed in error.	Thank you for your comments. This REC Change and the associated legal text now recognises “refresh” and “resend” as two distinct message types as in UNC modification 0836S.
National Grid Electricity Distribution (Distribution Network Operator)	Whilst we appreciate the proposed solution addresses the problem statement, we have concerns with the legal text.	Thanks for your comments, please see the Code Manager’s response to question 2.

Question 2:	Do you have any comments on the proposed legal text which sets out the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**

Wales and West Utilities (Gas Transporter)	The UNC mod recognises REFRESH and RESEND as two distinct pieces of functionality; however, the REC legal text blends the two definitions together and we believe this should be split out. The Resend / Refresh need to be defined separately to ensure the solution requirements are clear. Though we support faster switching, we cannot support this change until the legal text reflects the intended solution recognising the two distinct operations.	See response to Question 1.
National Grid Electricity Distribution (Distribution Network Operator)	The Legal Text is incorrect as this does not reflect the requirements of R0067 which is to provide CSS Refresh functionality for GRDA's only. The new version of Schedule 27 stated Version 1.0 includes references to the ERDA being able to receive a Refresh from CSS. Our understanding is the Change Proposal should only reference GRDA's ability to receive a Refresh, and therefore all references to any other party apart from GRDA's should not be included in the redlined text. We believe this was highlighted at the ex-committee meeting and as a result of the comments the redlining was amended under the previous V1.0 Change Proposal, to remove those recipients.	These concerns were highlighted previously however, the removal of references to other Service Providers within the legal text was done so in error. The GRDA was used to test the solution for R0067, but it will be available for use by other Service Providers if they wished to connect their systems. This however does not put any obligations on these Service Providers to utilise the solution, it is purely making it available if desired.

Question 3:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the Technical Expert Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Wales and West Utilities (Gas Transporter)	-	-
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree.	Noted.

Question 4:	Do you agree with the proposed implementation date of 18 December 2023 as an extraordinary REC release? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Wales and West Utilities (Gas Transporter)	-	-
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree.	Noted.

Question 5:	Given the information available to analyse this Change Proposal, do you agree the assumptions presented are reasonable? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Wales and West Utilities (Gas Transporter)	-	-
National Grid Electricity Distribution (Distribution Network Operator)	Please see our response in Q2.	Noted and addressed within Code Manager's response to question 2.

Question 6:	Do you agree that the level of risk associated with missing messages and delayed registrations outweighs the cost of the proposed solution? If not, please explain	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Wales and West Utilities (Gas Transporter)	-	-
National Grid Electricity Distribution (Distribution Network Operator)	-	-

Question 7:	Based on the Business Case Assessment and Case for Change, do you agree with the Code Manager's recommendation for this Change Proposal to be approved? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Wales and West Utilities (Gas Transporter)	Though we support faster switching, we cannot support this change until the legal text reflects the intended solution recognising the two distinct operations of RESEND and REFRESH.	
National Grid Electricity Distribution (Distribution Network Operator)	Please see our response in Q2.	

Question 8:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Wales and West Utilities (Gas Transporter)	-	-
National Grid Electricity Distribution (Distribution Network Operator)	-	-