RETAIL ENERGY CODE

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01	Initial Assessment Report
02	Preliminary Change Report
03	Final Change Report

INITIAL ASSESSMENT REPORT

R0084 - HOUSEKEEPING CHANGES TO THE APPROVED LEGAL TEXT FOR R0047

DOCUMENT VERSION	V1.0
DATE ISSUED	23/02/2023
DOCUMENT APPROVAL STATUS	APPROVED

RESPONSIBLE COMMITTEE	CHANGE PANEL	CHANGE PATH	SELF GOVERNANCE
PRIORITY STATUS	LOW	URGENCY	STANDARD

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	24/02/2023

LEAD CHANGE ANALYST



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CHANGE OVERVIEW

Since the approval of Change Proposal R0047 - Metering Code of Practice Consolidation Review, the Code Manager has identified a number of typographical errors and housekeeping changes needed to the approved legal text. This Change Proposal has been raised to make the necessary changes to the legal text of R0047, which will be implemented on 01 April 2023.

	High Impact: N/A
	Medium Impact: N/A
	Low Impact: Meter Equipment Managers (MEMs), Energy Suppliers, Approved Meter Installers (AMI), Meter Installers (MIs), Distribution Network Operators (DNOs), AMR Service Providers (ASPs) and the Metering Scheme Auditor

1 BACKGROUND

Change Proposal R0047 - Metering Code of Practice Consolidation Review was raised by the Retail Energy Code Company (RECCo) to consolidate the current Metering Codes of Practice into a single set of arrangements that are simplified, proportionate and relevant, which can be monitored via a single audit scheme.

R0047 will remove the four existing Metering Codes of Practice:

- Gas Metering Code of Practice;
- Electricity Metering Code of Practice;
- Automated Meter Reading Service Provider Code of Practice; and
- Smart Metering Installation Schedule.

These will be replaced with the new Consolidated Metering Code of Practice (CoMCoP). R0047 was approved by the Change Panel at their meeting on 15 November 2022, for implementation on 01 April 2023.

Following the approval of the R0047, a number of errors have been identified within the approved legal text. To ensure accuracy of the legal text, and that it reflects the intent of R0047, these errors should be addressed ahead of R0047 being implemented.

The correction of these errors will have no material impact on REC Parties; therefore, the Code Manager considers that this Change Proposal will only progress housekeeping changes, ensuring the CoMCoP reflects the intent of R0047 when it is implemented on 01 April 2023.

2 PROBLEM STATEMENT

To enable REC Parties to successfully meet the obligations of the CoMCoP, when it is implemented via Change Proposal R0047 on 01 April 2023, the CoMCoP needs to accurately reflect the intention of R0047 and current processes.

3 USER STORIES

REF.	USER STORIES
MARKET PARTICIPANT USER STORIES	
M1	As a DNO, MEM, AMI, ASP or MI, I want all Code of Practice 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 an Energy Supplier, I want to be confident that my Appointed agents are compliant with all relevant CoP obligations to ensure the safety of my Consumers.
M3	As RECCo, I want the Metering Scheme obligations to be clear and transparent, to ensure the arrangements deliver against the RECCo strategic aims.
M4	As the Metering Scheme Auditor, I want the Metering Scheme obligations to be clear and transparent, to ensure the arrangements deliver against the RECCo strategic aims.

4 IMPACTS

CONSUMERS
N/A

REC SERVICE PROVIDERS
Metering Scheme Auditor

RECCO / REC CODE MANAGER
N/A

REC PARTIES AND SERVICE USERS
Metering Equipment Managers
Distribution Network Operators
Approved Meter Installers
Meter Installers
Energy Suppliers
AMR Service Providers

REC DOCUMENTS / PRODUCTS
Consolidated Metering Code of Practice

The changes to the CoMCoP will address the following issues:

- **Meter Operative / Meter Installer references** - R0047 proposed changing Meter Operative references to Meter Installer. These terms are not interchangeable, Meter Operatives is the correct term to be used, as reflected in the current Metering Codes of Practice. This change will ensure there are no impacts on Parties through the introduction of unintended obligations resulting from the use of an incorrect term.
- The design principles for R0047[1], set out by RECCo, was to not introduce any new or additional obligations. Reverting to the use of Meter Operative supports this principle.
    - **Meter Operative** - means an employee, agent or subcontractor appointed by the MEM.[2]
    - **Meter Installer** - in relation to any Gas Meter, means a person a class or description of persons:
        - (a) possessing the expertise to connect that meter satisfactorily so that the gas supplied through it is duly registered, or a person whose staff have such expertise; and
        - approved in accordance with the Retail Energy Code[3]

[1] The design principles can be found within RECCo's CoP Project - Guiding Principles, developed as part of its review and working documents, which can be found here
[2] As defined in REC Schedule 1 - Interpretations and Definitions
[3] As defined within Gas Supplier Standard Licence Conditions (SLC 12)

- **Grammatical and Typographical errors** – such as spelling mistakes, incorrect terms, and defined terms not being capitalised.
- **Removing reference to a Crowded Meter Room Co-Ordinator (CMRC)** – the introduction of a CMRC is being proposed under Change Proposal R0043 - Commissioning of Works by the Crowded Meter Room Coordinator (CMRC) to Resolve Issues In Crowded Meter Rooms. R0043 has not yet been approved for implementation, therefore, the reference to the CMRC should not be used until R0043 has been approved. R0043 will identify and progress any necessary changes to the CoMCoP resulting from the proposed introduction of a CMRC.

The proposed changes to the CoMCoP can be found here. These will be finalised ahead of the Preliminary Change Report being published on 24 February 2023.

5 CROSS CODE IMPACTS

No cross-code impacts have been identified as part of this Change Proposal.

6 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	SELF-GOVERNANCE	RESPONSIBLE COMMITTEE	CHANGE PANEL

The legal text for Change Proposal R0047 was approved by the REC Change Panel, therefore it is appropriate for the Responsible Committee for this change to be the Change Panel.

7 PRIORITY STATUS AND URGENCY

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact		0	27	0
	Retail Markets Impact		1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	0	7	0
		Legal and Regulatory Compliance	1	14	14
Resource	Complexity / Effort / Duration		1	9	9
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		2		17
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	3	10	30
				Overall Priority Score (rounded)	95

Priority Status	LOW
Change Proposal Type	STANDARD

The Priority Status of this Change Proposal is low based on a priority score of 95.

Retail Markets Impact - a score of 1 as this change supports the introduction of transparent and accurate obligations on REC Parties, which contributes to the mitigation of risk driver 1.3 of the Performance Assurance Retail Risk Register.

Legal and Regulatory Compliance – a score of 1 as the proposed changes address areas of ambiguity and will ensure REC Parties are clear on the obligations they need to meet to be compliant.

Alignment with the Objectives of the REC – A score of 1 as while this change only clarifies existing obligations, it supports the consolidation of the Metering Scheme arrangements to drive improvements and efficiencies in the operation of the REC.

Alignment with RECCo's Forward Work Plan - a score of 2 as the implementation of this Change Proposal impacts the delivery of the RECCo strategic aim to consolidate, simplify and maintain retail governance arrangements.

Urgency - a score of 3 as this Change Proposal aligns with the implementation of R0047 and the start of the Metering Scheme year on 01 April 2023. This change should be progressed immediately to meet this date.

8 SUMMARY OF CHANGE PROPOSAL PLAN

The Code Manager has assessed the impacts of this Change Proposal and identified the necessary legal text changes; therefore, solution development activity is not required. The legal text changes will be finalised ahead of the Preliminary Change Report being issued.

As the Change Proposal is addressing typographical and other housekeeping changes, further impact assessment is not required.

The Preliminary Change Report will be issued for a 10 Working Day consultation on 24 February 2023, without first being presented to the REC Change Panel for their review.

To enable approval of the change in line with the implementation of R0047, an ex-Committee decision will be required.

	FROM	TO
PRELIMINARY CHANGE REPORT AND CONSULTATION ISSUED	24/02/2023	24/02/2023
CONSULTATION	24/02/2023	10/03/2023
FINAL CHANGE REPORT ISSUED	21/03/2023	21/03/2023
RESPONSIBLE COMMITTEE DECISION (EX-COMMITTEE)	21/03/2023	24/03/2023
APPEAL WINDOW CLOSURE	07/04/2023	07/04/2023

RETAIL ENERGY CODE

9 GLOSSARY

TERM	DEFINITION
AMR Service Provider (ASP)	means a business or organisation that offers provision of consumption data from a utility meter collected through an AMR system to a number of parties including Consumers, Shippers, Energy Suppliers, Gas Transporters, DNOs, energy brokers and energy management companies.
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.
Consolidated Metering Code of Practice (CoMCoP)	*As defined within the approved legal text for R0047* means the code of practice against which relevant ASPs, MEMs and MIs are assessed pursuant to the Metering Accreditation Schedule.
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier
Meter Installer	means a Metering Equipment Manager that is approved (or which is seeking approval) as a Meter Installer under the Metering Accreditation Schedule. “Approved Meter Installer” and “AMI” shall be construed accordingly.
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.
Metering Scheme	*As defined within the approved legal text for R0047* means the procedure for approving a person as a Metering Equipment Manager, Meter Installer or Automated Meter Reading Service Provider, including the auditing of such persons and suspension or withdrawal of approval, in each case based on such persons compliance (or non-compliance) with the CoMCoP and as further described in Paragraph 3 of the Metering Accreditation Schedule.

TERM	DEFINITION
Metering Scheme Auditor	*As defined within the approved legal text for R0047* means a person appointed by RECCo to audit compliance with the CoMCoP.
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