RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0094 - CLARIFY OBLIGATIONS ON GAS METER EXCHANGES THAT OCCUR CLOSE TO COS

On 9th May 2024 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0094 - Clarify obligations on gas meter exchanges that occur close to CoS.

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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RESPONSIBLE COMMITTEE	Metering Expert Panel
LEAD ANALYST	Lydia Bentley

DATE CONSULTATION ISSUED	09/05/2024
RESPONSE DEADLINE	31/05/2024

Question 1:	Do you agree the proposed solution resolves the problem statement? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Siemens (Metering Equipment Manager)	Agree	Thank you.
Ovo (Supplier)	Yes, our suggested legal text amendments were considered as part of the IA stage.	Thank you.
ENGIE (Supplier)	Yes.	Thank you.
SSE (Supplier)	SSE agree that the proposed solution resolves the problem statement.	Thank you.
Anonymous (Energy Supplier)	We agree with this change in principle; however, we recommend that the legal text is amended further to ensure any duplications and ambiguity are removed. **1. The Gaining MEM appointment where the Meter Exchange Close to CoS** - The proposed legal text states that in a scenario where a meter exchange is close to CoS, the Losing MEM should send the ONDET without waiting for the Gaining MEM to request this information. Then, the process follows on, stating that once the ONDET information is received by the Gaining MEM (9.5.13) and the Gaining MEM is appointed (9.5.18), then the Gaining MEM (9.5.20) should send the request for meter technical details to the Losing MEM who then response with an ONDET (9.5.21). The proposal as-is can result in duplications, failure points and unnecessary complexity in the MEM systems because 1) the Gaining MEM still requests the metering information following their appointment (9.5.20) even though they have received the latest ONDET already	The Code Manager is appreciative of this feedback including such a detailed and considered response. The Code Manager has reviewed the response, and has the following comments. The respondent has identified a potential duplication between the proposed new process steps, and existing process steps 9.5.14 and 9.5.15. Whilst the Code Manager does appreciate that there is a risk of process duplication, our reasoning behind the new process steps is that if the existing ONDET/ORDET mechanism were sufficient to resolve this issue, then additional process steps would not be required.

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	(9.5.13), and 2) it is likely that the Losing MEM will not know who the Gaining MEM is/ who to send the metering details if they don't receive the Gaining MEM's request ORDET for metering data. **RECOMMENDATION:** We recommend that the legal text is aligned with the current RGMA process: The current RGMA process states that the Gaining MEM upon their appointment by the Gaining Supplier (current legal text 9.5.12 & 9.5.13), sends ORDET request to the Losing MEM to request the meter technical details which are shared by the Losing MEM via ONDET (the current legal text 9.5.14 & 9.5.15). As a result, we propose that: 1. The MEM appointed and de-appointed processes are completed before the losing MEM shares the ONDET information with the Gaining MEM. 2. The Losing MEM waits for the Gaining MEM's ORDET request before they share the ONDET with them. 3. The Losing MEM validates their systems for recent meter exchange that occurred close to CoS before they share the meter technical details with the Gaining MEM via ONDET 4. Following this, the existing process RGMA continues. This way, the Gaining MEM sends the request, which is as per BAU, and the Losing MEM is likely to provide the latest information to the Gaining MEM following the required validation in their systems.	Furthermore, whilst the Code Manager appreciates an alternative solution, the Code Manager will not move forward with it over the existing solution. This is because we would expect the alternative solution that has been proposed is likely to result in additional complexity, and could result in a greater risk of delay in resolving R0094 incidents, relative to the original solution. Additionally, consider that this alternative solution may lead to greater operational complexity relative to the Code Manager's initial proposed solution.

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	2. Step 9.5.12 – the validation in the Losing MEM's systems – this step seeks to identify if the osing MEM was de-appointed and if meter exchange occurred close to CoS date following the de-appointment. The current proposal states that the MEM should check if the Effective To Date is in the Past and the Transaction Type Reason Code is CoS. The EFFECTIVE_TO_DATE validation - as it is - may not address the problem area because currently MEMs don't accept retrospective updates which means this date when they receive the ONAGE request is likely to be in future. This may lead to this step being omitted when the Losing MEM is de-appointed. This validation may require amending to ensure the CoS loss scenario is covered.	
Xoserve (CDSP)	We consider that the proposed solution should reduce instances of exceptions. We support the proposed changes that: - Clarify that MEMs should only conduct work for a period that they are appointed; - MEMs, having conducted any work, should provide the relevant notification (noting that this should already be clear to parties under the Connection and Disconnection Regulations that this obligation exists). The above clarifications should reduce the circumstances where data is not provided to Central Systems following metering works provided that parties promptly generate and pass these notifications.	The Code Manager will address the points raised below: **"Clarify that MEMs should only conduct work for a period that they are appointed"** The Code Manager has updated the proposed solution with an amendment to the draft legal text. This amendment reads as follows: "Meter Asset Managers shall only proceed with the Metering Asset Exchange if they

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	We note that Suppliers (and Shippers who are not governed under the REC) should also ensure that they are promptly passing on this information, and that this should be passed even where the Registration has ended [where the Metering Works was within their ownership or requested by them]. We also advocate that Suppliers should assess their processes to seek to reduce the risk of Metering Works instigated by them being carried out after they are no longer the Registered Supplier, or that they don't initiate Metering Work until they have a secured Registration.	reasonably believe they will have a valid appointment status on the date of the Metering Asset Exchange." **"MEMs, having conducted any work, should provide the relevant notification (noting that this should already be clear to parties under the Connection and Disconnection Regulations that this obligation exists)."** The Code Manager has amended the draft legal text to include the following wording, which can be found in Sections 6, 7 and 8. "Where a MAM conducts a Metering Asset [Exchange/Removal/Installation] following instruction by a Supplier, the MAM should take all reasonable steps to report the details of the Metering Asset [Exchange/Removal/Installation] onward as per their obligations in Paragraph [6/7/8], regardless of their appointment status upon completion of the Metering Asset [Exchange/Removal/Installation]."

Question 2:	Do you agree that the proposed changes to Schedule 14 – Metering Operations would resolve the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Siemens (MEM)	Agree	Thank you.
Ovo (Supplier)	Yes, the vast majority of scenarios in the problem statement will be covered by the legal text changes. We did suggest changed wording in the IA to definitively broaden the scope. However, we have no backing data to prove volumes of edge cases, and on this basis, and following bilaterals with the REC team, we are fine with the suggested legal text.	Thank you – The Code Manager has valued your engagement through the Change process. In the absence of quantitative data to support your position, the Code Manager intends to retain the legal text as it currently is.
ENGIE (Supplier)	Yes.	Thank you.
SSE (Supplier)	SSE are happy that the proposed changes resolve the issues where the meter work is carried out prior to the switch date. SSE would like to ensure that meter work is not carried out after the mem de-appointment or change of supplier.	Thank you – The Code Manager expects that the proposed solution will address the concerns raised about work being conducted on a Metering Asset following de-appointment.
Anonymous (Energy Supplier)	Please see our comments to Question 1.	Please refer to response to Question 1.
Xoserve (CDSP)	As above, the above changes should reduce exceptions provided that the following is explicit and acted upon: - that MEMs should only conduct work for a period that they are appointed; - that MEMs, having conducted any work, should provide the relevant notification (noting that this should already be clear to parties under the Connection and Disconnection Regulations that this obligation exists). The extent to which exceptions will be resolved will remain to be seen.	Please refer to response to Question 1.

Question 3:	On paragraph 9.5.12 in Schedule 14 – Metering Operations the proposed wording is intended to ensure that this new obligation only applies to the R0094 scenarios. Do you agree that it achieves this? If not, please provide a rationale, and any alternative suggestions.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Siemens (Metering Equipment Manager)	Agree	Thank you.
Ovo (Supplier)	Yes, we believe that the wording of 9.5.12 is sufficiently specific to only apply to the intended scenarios. We did suggest that this was changed to "following deappointment" to capture instances where ONAGE flows may have failed to be issued, however, we have no backing data on the volume of instances this would apply to.	Please refer to response to Question 2.
ENGIE (Supplier)	Yes.	Thank you.
SSE (Supplier)	Yes although we would expect the wording to be explicit that MEM's should not be carrying out any work after the de-appointment date. The current drafting should be moved to column 'Action' as this follows other processes within the schedule. E.g. Clause 8.9.10. The 'When' column should refer to the previous clause. When: Following 9.5.11 Action: Confirm if Metering Asset Exchange/Reposition/Reconfigure has been conducted and/or not recorded following effective de-appointment date found within the ONAGE If ONAGE DI40174 Transaction Type Reason Code = COS, and where ONAGE DI40088 Effective To Date is in the past. Otherwise, move to 9.5.18	Thank you for your feedback. The Code Manager expects that the proposed legal text amendments to Sections 6, 7 and 8 of Schedule 14 – Metering Operations will address these concerns. Regarding the placement of the conditionality within the "Action" column rather than the "When" column, the Code Manager did initially consider this. However, the Code Manager felt that by placing the "trigger" for these proposed new process steps in the "When" column, we make it clear that we want to specifically target only the scenarios that lead to the R0094 issue. Further, having this within the "When" section is consistent

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		with other comparable conditionality clauses within the REC.
Anonymous (Energy Supplier)	Please see our comments to Question 1.	Please refer to response to Question 1.
Xoserve (CDSP)	We do have reservations about the use of ONJOB flows by the party that has not undertaken the work as both the Gaining and Losing MAM are instructed to initiate these flows in the event of exceptions. Assessment of this against C&D Regs is advised. This approach risks greater volume rejections by the CDSP where received from Shippers where they are not the Registered User, or they do not meet the other timing criteria provided by the CDSP in support of the analysis of this Change Proposal. We would advocate that parties responsible for the Metering Works issue the relevant Notifications is a timely manner to reduce exceptions on their industry counterpart.	The Code Manager expects that the legal text amendments referred to in the response to Question 1 would address these concerns.

Question 4:	The Code Manager expects that the proposed solution can be applied equally to Domestic and Non-Domestic (where relevant) gas metering scenarios. Do you agree with the Code Manager's assessment? If not, please provide a rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Siemens (Metering Equipment Manager)	Agree	Thank you.
Ovo (Supplier)	Yes, we agree.	Thank you.
ENGIE (Supplier)	Yes.	Thank you.
SSE (Supplier)	As a non domestic only supplier SSE agree this solution should also apply to non domestic scenarios.	Thank you.
Anonymous (Energy Supplier)	Please see our comments to Question 1.	Please refer to response to Question 1.
Xoserve (CDSP)	We tend to agree with the conclusion drawn by the Code Manager that this would apply equally to dom and non dom Supply Meter Points. We do note that under non dom Switch scenarios there may be a greater opportunity for the Losing Supplier to cancel Metering Work with the extended (2 Working Day) Objection Period, potentially reducing the risk of Metering Work initiated by the Losing Supplier taking place in the Gaining Supplier ownership.	Thank you.

Question 5:	Do you have any other comments on the proposed solution or legal text changes?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Siemens (Metering Equipment Manager)	None.	Thank you.
Ovo (Supplier)	As the modification proposer, we would like to thank the REC team and CDSP for their support in the mod's development.	Thank you – We have enjoyed working with you on this Change also.
ENGIE (Supplier)	No.	Thank you.
SSE (Supplier)	As mentioned above MEM's should not be carrying out metering work after de-appointment	Thank you – The Code Manager expects
Anonymous (Energy Supplier)	Please see our comments to Question 1.	Please refer to response to Question 1.
Xoserve (CDSP)	We are concerned about the use of the ONJOBs in Section 9 by parties not responsible for the Connection and / or Disconnection.. If this is acceptable to MEMs and Suppliers then this will need to be assessed after implementation as to the solution efficacy, and the extent to which Suppliers are acting on notifications provided by the UK Link system in the event of Central System exceptions.	Thank you – The Code Manager will explore options on how to monitor the efficacy of the proposed solution should it be approved by the Responsible Committee.

Question 6:	Do you agree with the Code Manager's preliminary assessment that the proposed solution would constitute a positive case for change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Siemens (Metering Equipment Manager)	Agree	Thank you.
Ovo (Supplier)	Yes, first and foremost, we see this as a clear benefit for consumers as well as the health of metering data and the consequential impacts that clean metering data deliver, such as better billing, settlements, MAP validation, and so on.	Thank you.
ENGIE (Supplier)	Yes.	Thank you.
SSE (Supplier)	SSE are in favour of the losing MEM sending meter exchange details that are carried out prior to COS to their appointed MEM and the appointed MEM forwarding these details to the gaining supplier.	Thank you – The Code Manager expects that this is captured within the proposed solution.
Anonymous (Energy Supplier)	Please see our comments to Question 1.	Please refer to response to Question 1.
Xoserve (CDSP)	Reduction of exceptions and ensuring parties understand their obligations is positive.	Thank you.

Question 7:	The Code Manager has proposed a February 25 release as it allows for a six-month implementation lead time (noting the proximity of this release to Market-wide Half Hourly Settlement go-live, currently targeting March 2025). However, we have also considered whether November 24 would be appropriate. Which release date would you prefer? Please justify your response and provide a rationale.	
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Siemens (Metering Equipment Manager)	We could implement R0094 quickly, so we don't have a strong opinion on release dates. R0094 is not urgent, so recommend you choose a date that has least chance of impacting MHHS plans.	Thank you – The Code Manager will now pursue a November 2024 release.
Ovo (Supplier)	We believe that this is not a complicated modification and therefore support implementation in Nov 2024.	Thank you – The Code Manager will now pursue a November 2024 release.
ENGIE (Supplier)	A November 2024 release would be better to avoid the MHHS go-live period.	Thank you – The Code Manager will now pursue a November 2024 release.
SSE (Supplier)	This should have minimal impact on our system and should be a process change to pick up different meter details post COS. Therefore we are supportive of either implementation date.	Thank you – The Code Manager will now pursue a November 2024 release.
Anonymous (Energy Supplier)	We will require 6-9 months lead time; therefore, the February 2025 Release is preferred	As all other respondents have indicated that they are receptive to a November 2024 release, we will not be able to accommodate a February release on this basis.
Xoserve (CDSP)	We do not consider that there are any changes required to CDSP Systems. We offer no preference regarding the implementation of this change as a consequence. Note: we have not consulted with our DSC Customers who may have a preference should they need to make changes to their systems.	Thank you.

Question 8:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Siemens (Metering Equipment Manager)	None	Thank you.
Ovo (Supplier)	None	Thank you.
ENGIE (Supplier)	No.	Thank you.
SSE (Supplier)	No.	Thank you.
Anonymous (Energy Supplier)	No comments.	Thank you.
Xoserve (CDSP)	We do not consider that any changes are required to the UK Link system from this change. Should the Code Manager amend the Legal Text / Solution following the consultation we will need to further assess this.	Thank you.