RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED PARTY IMPACT ASSESSMENNT RESPONSES

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

On 27 March 2024 the Code Manager issued a Party Impact Assessment to industry to seek feedback on the draft proposed solution for R0094.

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
DATE ISSUED	25 April 2024
RESPONSIBLE COMMITTEE	REC Metering Expert Panel
LEAD ANALYST	Lydia Bentley

DATE CONSULTATION ISSUED	27 March 2024
RESPONSE DEADLINE	19 April 2024

Question 1:	Do you have any comments on the proposed solution or legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO (Energy Supplier) Non-Confidential	We believe that 9.5.12 should be updated so that the box in the “when” column reads “Following deappointment” only. Our rationale for removing the detail from this box is that meter exchange may occur when ONAGE flows have not been issued correctly. We would not want the unintended consequence of specifying the requirement to be in receipt of the ONAGE to be the prevention of the losing supplier's MEM from following step 9.5.12. If we used "Following deappointment" it would remove the prescription. We have no detail on the materiality that I can provide for this scenario, but is worthy to capture within this IA in the event that data becomes available. 9.5.15 might need to updated to include “where possible” - a subsequent MEX after CoS but before receipt of the unsolicited ONDET might mean that the MEX details will not be accepted by CDSP. Footnote 34: This footnote needs to be phrased so that the MEM is “authorised” to perform the exchange by the incumbent supplier. i.e. should only apply when it is known that the supplier’s CoS is at a point at which it cannot be prevented from completing. 9.5.17 we understand the gist of this step. However, like 8.5, it would be useful and clearer to have each step broken down. We also would like the MAP step to be included.	The Code Manager accepts that there are multiple approached to the wording of 9.5.12, and will open this up for discussion during Consultation. The Code Manager has discussed the concerns raised around Footnote 36 with the respondent, and the respondent has confirmed that these have been addressed by amendments made in response to comments from SEFE (see below). Regarding the comments on 9.5.15, the Code Manager has discussed these with the respondent, and they have confirmed that they are addressed by Footnote 47. Regarding the comments on the wording of 9.5.17, the Code Manager acknowledges the concerns raised, but will not make changes as there is precedent for this formatting elsewhere within the REC. Footnote 34/36 – Concerns captured under SEFE amendment.

Question 1:	Do you have any comments on the proposed solution or legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
ENGIE (Energy Supplier) Non-Confidential	We are in agreement with the proposed solution and believe it will help reduce the number of instances of missing Meter Technical Details (MTDs) in the gas sector.	Thank you.
SMS (Metering Equipment Manager) Non-Confidential	I definitely agree that a change is required to ensure that all members of industry are updated efficiently and accurately.	Thank you.
EDF (Energy Supplier) Non-Confidential	Through our assessment of R0094 we identified that the proposed solution doesn't include the MEM-to-MEM communications, namely: • On gas CoS process, it is possible that an old MEM is being replaced by a new MEM, although not in ever CoS event. In this case old MEM sends new MEM an ORDET and new MEM sends metering information over on a ONDET. • In the scenario of meter exchange prior to CoS, if ONDET has already been sent by the old MEM to the new MEM with the details of the old meter, a new ONDET will also need to be issued when the MEM(s) identify that the old meter was replaced to avoid discrepancy between the new MEM information, the incoming Supplier and CDSP. • This means that upon the meter exchange, the old MEM will not only be required to send a ONJOB update to the incoming Supplier and CDSP, but also update the incoming MEM again with the latest metering details to ensure industry data integrity. • Moreover, in these cases MEM needs to be able to not only send out ONJOB but possibly - if they are the new MEM - deal with two ONDETs as part of being appointed by incoming Supplier on CoS. Lastly, that new MEM would also need to send ONUPDs with new meter data from second ONDET to their Supplier and to CDSP.	The Code Manager has met with the respondent to discuss their feedback. Following a review of the latest iteration of the proposed solution, and a discussion about how the draft legal text is expected to work in practice, the respondent has confirmed that their concerns raised in the impact assessment have been resolved.

Question 1:	Do you have any comments on the proposed solution or legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
	• Not updating the incoming MEM may lead to introduction of data mismatches which may future impact on consumer billing.	
SSE (Energy Supplier) Non-Confidential	SSE view this as a positive change and have no comments on the proposed legal text	Thank you.
SEFE (Energy Supplier) Non-Confidential	We do not believe that the current approach is appropriate for larger nondomestic scenarios were longer lead times for the provision of metering may put the MEM in breach of the proposed wording if they proceed with the works. This also applies if new mains and services are being laid in to site and are subject to operational changes. 8 - MEMs should only proceed with the Metering Asset Installation if they have a valid appointment status on the date of the Metering Asset Installation. For larger metering installations orders may be placed months in advance of the works being undertaken and MEM's can be de-appointed with one working days' notice therefore the MEM needs a degree of operational flexibility and we suggest that perhaps the text should read: "MEMs should only proceed with the Metering Asset Installation if they reasonably believe they will have a valid appointment status on the date of the Metering Asset Installation". We also wanted to check that any changes proposed would not create any unintended consequences for scenarios were the Customer is the	The Code Manager agrees with your assessment and accepts that our initial legal text drafting did not adequately address the scenario that you have identified. As a result, the Code Manager has updated the proposed legal text to include the "reasonably believe" wording.

Question 1:	Do you have any comments on the proposed solution or legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
	Gas Act Owner. In such circumstances the Customer will have arrangements directly with the MEM and will therefore be agnostic to the appointment status.	
BUUK (Metering Equipment Manager) Non-Confidential	We support this change and believe that it is a beneficial Modification to impacted parties.	Thank you.

Question 2:	What impact to your systems and operational processes do you expect as a result of implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO (Energy Supplier) Non-Confidential	We see minimal impact to our systems and processes to allow for the routing of flows in this scenario. There may be impact to the billing system. However, we have not been able to fully impact assess this element.	The Code Manager will ensure that there is sufficient time between approval and implementation to ensure that REC Parties can properly update their operational processes and systems.
ENGIE (Energy Supplier) Non-Confidential	Positive impact. Obliging the MEM to provide MTDs even if they have been de-appointed during a coincident COS and meter exchange event will reduce the number of instances where MTDs fail to be provided to the new supplier. This in turn will prevent problems with billing the customer in a timely and accurate manner and lead to a better overall customer experience	Thank you.
SMS (Metering Equipment Manager) Non-Confidential	For my organisation, after analysis, there would be no impact as we already do issue the ONJOB etc even close to CoS and after we have been de-appointed. This is automatic in our systems, so no change would be required for us.	Thank you.
EDF (Energy Supplier) Non-Confidential	Impact on switching journey and business processes.	The Code Manager will ensure that there is sufficient time between approval and implementation to ensure that REC Parties can properly update their operational processes and systems.
SSE (Energy Supplier) Non-Confidential	This change will have a minor impact on our system and will require minimal changes to our operational processes.	Thank you.

Question 2:	What impact to your systems and operational processes do you expect as a result of implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SEFE (Energy Supplier) Non-Confidential	No analysis undertaken	Thank you.
BUUK (Metering Equipment Manager) Non-Confidential	-	-

Question 3:	If possible, please provide delivery costs that you might incur as a result of system changes needed to accommodate the proposed solution? Where possible, please provide a breakdown of design, build, test and phases, and ongoing operational costs.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO (Energy Supplier) Non-Confidential	It is difficult at this stage to provide an accurate breakdown. However, the costs would be low.	Thank you.
ENGIE (Energy Supplier) Non-Confidential	We do not foresee any costs as there are no changes to processes or flows, the change merely seeks to make an existing obligation more explicit in code.	Thank you.
SMS (Metering Equipment Manager) Non-Confidential	N/A	-
EDF (Energy Supplier) Non-Confidential	We have at this time been unable to complete a full assessment of this change as we believe it is currently incomplete and so cannot accurately assess all impacted areas.	Please refer to response to Question 1.
SSE (Energy Supplier) Non-Confidential	SSE cannot provide the system change costs at this stage but expect them to be low. The benefits of this change will outweigh any expected costs.	Thank you.
SEFE (Energy Supplier) Non-Confidential	No analysis undertaken	Thank you.
BUUK (Metering Equipment Manager) Non-Confidential	-	-

Question 4:	If possible, please confirm what your expected lead time would be to the deliver system changes for this solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO (Energy Supplier) Non-Confidential	A 3 month lead time would be sufficient to implement this modification	The Code Manager will ensure that there is sufficient time between approval and implementation to ensure that REC Parties can properly update their operational processes and systems.
ENGIE (Energy Supplier) Non-Confidential	We do not foresee any lead time as there are not associated system changes.	Thank you.
SMS (Metering Equipment Manager) Non-Confidential	N/A	-
EDF (Energy Supplier) Non-Confidential	Based on initial review and depending on if any other changes are made to solution than a lead time of between 6 to 9 months could be required.	The Code Manager will ensure that there is sufficient time between approval and implementation to ensure that REC Parties can properly update their operational processes and systems.
SSE (Energy Supplier) Non-Confidential	As with any system changes SSE would require at least 6 months lead time from approval.	The Code Manager will ensure that there is sufficient time between approval and implementation to ensure that REC Parties can properly update their operational processes and systems.
SEFE (Energy Supplier) Non-Confidential	No analysis undertaken	Thank you.

BUUK (Metering Equipment Manager) Non-Confidential	-	-

Question 5:	Do you believe there to be any additional consequences or impacts, to implementing this solution that should be considered, that the Code Manager has not already identified or addressed?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO (Energy Supplier) Non-Confidential	None, as proposer of this modification we have had an (sic) comprehensive exchange on impacts and consequences.	Thank you.
ENGIE (Energy Supplier) Non-Confidential	No.	Thank you.
SMS (Metering Equipment Manager) Non-Confidential	None.	Thank you.
EDF (Energy Supplier) Non-Confidential	Please see our response to question 1.	Please refer to response to Question 1.
SSE (Energy Supplier) Non-Confidential	SSE cannot see any additional consequences of the change at this stage.	Thank you.
SEFE (Energy Supplier) Non-Confidential	See question 1	Please refer to response to Question 1.

BUUK (Metering Equipment Manager) Non-Confidential	-	-

Question 6:	[For MEMs only] What impact, if any, do you anticipate that the proposed solution will have on your existing obligations in primary legislation to update the Connections & Disconnections store following a Change of Metering Asset?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO (Energy Supplier) Non-Confidential	-	-
ENGIE (Energy Supplier) Non-Confidential	N/A – we are a Supplier.	-
SMS (Metering Equipment Manager) Non-Confidential	None, due to our systems already implementing the proposed change.	Thank you.
EDF (Energy Supplier) Non-Confidential	Please see our response to question 1.	Please refer to response to Question 1.
SSE (Energy Supplier) Non-Confidential	N/A	-
SEFE (Energy Supplier) Non-Confidential	N/A	-

BUUK (Metering Equipment Manager) Non-Confidential	-	-

Question 7:	Do you believe there are any issues that have not been addressed through the solution or legal text? If yes, please provide details	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO (Energy Supplier) Non-Confidential	The issues are highlighted in our response to question 1.	Please refer to response to Question 1.
ENGIE (Energy Supplier) Non-Confidential	No.	Thank you.
SMS (Metering Equipment Manager) Non-Confidential	No.	Thank you.
EDF (Energy Supplier) Non-Confidential	Please see our response to question 1.	Please refer to response to Question 1.
SSE (Energy Supplier) Non-Confidential	No.	Thank you.

SEFE (Energy Supplier) Non-Confidential	No analysis undertaken	Thank you.
BUUK (Metering Equipment Manager) Non-Confidential	-	-

Question 8:	[For MEMs only] Do you expect there to be a direct link between this change and R0105?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO (Energy Supplier) Non-Confidential	-	-
ENGIE (Energy Supplier) Non-Confidential	N/A – we are a Supplier.	-
SMS (Metering Equipment Manager) Non-Confidential	No.	Thank you.
EDF (Energy Supplier) Non-Confidential	R0094 seeks to amend the routing of the metering update flow following Change of Supply, whereas the R0105 seeks to review the appointments timelines. Whist they both seek to address 2 different issues within RGMA, we would recommend that they are issued for a combined IA request.	Thank you for your feedback on this. Regrettably, the Code Manager will not be able to accommodate this request. These changes are progressing according to different plans, with the R0105 Party Impact Assessment to be published on 31 May 24.

		However, the Code Manager can look at aligning the implementation of both of these changes. Additionally, we can ensure that R0094 impacts are captured within R0105 impact assessment activities.
SSE (Energy Supplier) Non-Confidential	N/A	
SEFE (Energy Supplier) Non-Confidential	N/A	
BUUK (Metering Equipment Manager) Non-Confidential	-	

Question 9:	Do you agree with the Code Manager's assessment that the proposed solution would sufficiently resolve the problem statement of the change, and prevent this issue from occurring?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO (Energy Supplier) Non-Confidential	Yes, we agree with the code managers assessment	Thank you.
ENGIE (Energy Supplier) Non-Confidential	Yes.	Thank you.
SMS (Metering Equipment Manager) Non-Confidential	Yes – the proposed change would allow all parties in industry to be notified efficiently of correct MTD's etc.	Thank you.

EDF (Energy Supplier) Non-Confidential	Please see our comments to question 1.	Please refer to response to Question 1.
SSE (Energy Supplier) Non-Confidential	SSE agree the proposed solution meets the problem statement.	Thank you.
SEFE (Energy Supplier) Non-Confidential	See question 1	Please refer to response to Question 1.
BUUK (Metering Equipment Manager) Non-Confidential	-	-

Question 10:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO (Energy Supplier) Non-Confidential	No, we do not have any further comments.	Thank you.
ENGIE (Energy Supplier) Non-Confidential	No.	-
SMS (Metering Equipment Manager) Non-Confidential	No.	-

EDF (Energy Supplier) Non-Confidential	No.	-
SSE (Energy Supplier) Non-Confidential	No.	-
SEFE (Energy Supplier) Non-Confidential	No.	-
BUUK (Metering Equipment Manager) Non-Confidential	We are unsure as to why Change Proposal R0064 has been referenced (namely changing MEM back to MAM). Our understanding is R0064 is an Electricity only CP.	The solution for R0064 involved a change to Schedule 14 – Metering Operations, in Gas MEMs were re-named MAMs to distinguish them from Electricity MEMs.