RETAIL ENERGY CODE

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

INITIAL ASSESSMENT REPORT

R0095 – CHANGES TO ALLOW DNOS TO REINSTATE DISCONNECTED MPANS

DOCUMENT VERSION	V1.0
DATE ISSUED	20/09/2023
DOCUMENT APPROVAL STATUS	APPROVED

RESPONSIBLE COMMITTEE	CHANGE PANEL	CHANGE PATH	SELF-GOVERNANCE
PRIORITY STATUS	MEDIUM	URGENCY	STANDARD

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	02/02/2024

LEAD CHANGE ANALYST



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CHANGE OVERVIEW

When Meter Point Administration Numbers (MPANs) are erroneously disconnected, they cannot be reinstated. As a result, Consumers suffer billing issues and Registered Suppliers cannot settle against the disconnected MPAN. This change seeks to introduce a mechanism to restore erroneously disconnected MPANs.

	High Impact: Electricity Consumers
	Medium Impact: Electricity Suppliers DNOs/iDNOs Central Switching Service (CSS) Metering Point Registration Services
	Low Impact: N/A

1 BACKGROUND

Under the Master Registration Agreement (MRA), which pre-dated the creation of the REC, the MRA was the Code which covered the electricity registration activities until September 2021. Under the MRA, DNOs were allowed to reinstate MPANs that were erroneously disconnected, using the (MRA) Agreed Procedure (MAP04). However, MAP04 was not transitioned into the REC, and the new Central Switching Services (CSS) that went live in July 2022 did not include a mechanism to allow the same reinstatement of an MPAN following an erroneous disconnection.

Currently, reinstatements cannot be made where the Supplier has submitted a Registration Deactivation request to CSS (as per Schedule 27 – RMP Lifecycle - paragraph 4.1.8). Registered Suppliers initiate termination messaging to the CSS in response to an inbound notification of MPAN Disconnection from the DNO via the Electricity Retail Data Service (ERDS) (as per Schedule 27 – RMP Lifecycle paragraph 4.1.3). Consequently, the Registrable Measurement Point (RMP) is irreversibly terminated; there is no mechanism to reverse this process currently.

Due to the irreversible nature of a disconnection, a new MPAN needs to be created to rectify the issue. This has significant impacts:

- Consumers cannot be billed, cannot switch supplier, and may lose their previous tariff upon issue resolution
- Registered Suppliers cannot settle for consumption during the period where the supply is disconnected and unregistered on the system; and
- DNOs may be unable to collect DUoS revenue during any period of erroneous disconnection.

This change seeks to identify and implement a mechanism where erroneously disconnected MPANs can be restored retrospectively, with no loss of associated data. This will allow full settlement against the lost period for the Registered Supplier, and continuity for the Consumer.

2 PROBLEM STATEMENT

When MPANs are incorrectly identified and targeted for disconnection, the RMP will be erroneously terminated following receipt of Termination Market Messages by the CSS. This process is irreversible once triggered, meaning that there is no mechanism to restore the MPAN as it was previously. This results in a poor Consumer experience, and settlement misbalancing for Registered Suppliers. Currently, there is no mechanism to mitigate the negative impact on Registered Suppliers/DNO and Consumers.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As a Consumer, I do not want the erroneous disconnection of my MPAN to affect the continuity of my supply contract and billing arrangements.
MARKET PARTICIPANT USER STORIES	
M1	As a DNO, I want to be able to reverse erroneous disconnections with no lasting effect so that I don't need to create a new MPAN to resolve the issue, thereby avoiding DUoS payment collection issues.
M2	As a Supplier, I want to be able to reverse erroneous disconnections with no lasting effect so that I can correctly bill my consumers.
M3	As the CSS, I want users to be able to effectively resolve discrepancies, so that industry data for their portfolio is accurate.
M4	As MPRS, I want users to be able to effectively resolve discrepancies, so that industry data for their portfolio is accurate.

4 IMPACTS

CONSUMERS
Electricity Consumers

REC SERVICE PROVIDERS
CSS Provider
Electricity Retail Data Agent (ERDA)
Meter Point Registration Services (MPRS)

REC DOCUMENTS / PRODUCTS
Schedule 27 – RMP Lifecycle
Market Message Catalogue

REC PARTIES AND SERVICE USERS
Electricity Suppliers
DNOs/iDNOs

The CSS Provider will be impacted as any changes made to existing Market Messages that communicate Meter Point Administration Number (MPAN) registration status will require changes to the CSS systems. ERDA/MPRS will be impacted for the same reasons.

Suppliers and DNOs will be impacted because changes to MPAN registration status will need to be understood and processed by both parties.

Consumers are being impacted as billing will be interrupted, they will be unable to switch suppliers and may lose their previous tariff upon issue resolution.

5 CROSS CODE IMPACTS

There will need to be engagement with the Balancing & Settlement Code (BSC). This is because erroneously disconnected MPANs cannot be settled for by the Registered Supplier, and any solution put forward will need to keep settlement whole.

RETAIL ENERGY CODE

6 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	SELF-GOVERNANCE	RESPONSIBLE COMMITTEE	CHANGE PANEL

This change will follow a Self-Governance Change Path. This Change Proposal impacts REC Schedule 27 – RMP Lifecycle which is the responsibility of the Change Panel and therefore it will be the Responsible Committee.

7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	1	27	27
	Retail Markets Impact	Innovation and Market Arrangements	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	2	14	28
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		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	0	10	0
				Overall Priority Score (rounded)	103

Priority Score	Priority Status
171 and above	Critical
151 to 170	High
101 to 150	Medium
0 to 100	Low

Priority Status	MEDIUM
Change Proposal Type	STANDARD

Urgent Change Proposals meet the Criteria for Urgency as set out by Ofgem

This Change Proposal has a medium priority status based on a score of 103.

- Operational Effectiveness & Efficiency for REC Parties & Service Providers has been given a score of two, to indicate moderate impact. A system for retroactively reinstating terminated MPANs would lighten the operational burden for DNOs/iDNOs and Registered Suppliers, as the current workarounds for this issue is operationally complex.
- Legal and Regulatory Compliance for REC Parties & Service Providers has been given a score of two, to indicate moderate impact. Erroneous disconnections render Registered Suppliers & DNO/iDNOs unable to properly execute licence requirements. They are unable to efficiently bill Consumers, switching becomes more difficult, and it can result in the loss of Priority Services Register data.
- All other scores have been rated as one or zero, as appropriate.

8 SUMMARY OF CHANGE PROPOSAL PLAN

This Change Proposal seeks to identify a mechanism whereby erroneously disconnected MPANs can be reinstated without any loss in supply continuity for either the Registered Supplier, the DNO/iDNO, or the Consumer.

Before the Change Proposal was raised, stakeholder engagement with the Code Manager, REC Parties and Service Providers took place via the REC Technical Design Authority's Technical Change Workshop (between May, June and August), as well as through informal meetings. They reviewed the problem and considered potential solutions. We do not therefore propose to carry out a further period of Solution development and consequently have not included any further time in the Change Proposal Plan.

We intend to carry out Party Impact Assessments on the proposed Solution, and time allowed in the plan for this has been extended to 20 Working Days, to factor in the Christmas holiday periods.

Due to the complexity, size and scale of the proposed Solution, the Code Manager proposes an extended 60 Working Day Service Provider Impact Assessment period.

	FROM	TO
SERVICE PROVIDER IMPACT ASSESSMENT	18/09/2023	11/12/2023
PARTY IMPACT ASSESSMENT	12/12/2023	12/01/2024
PRELIMINARY CHANGE REPORT ISSUED	02/02/2024	02/02/2024
RESPONSIBLE COMMITTEE REVIEW	13/02/2024	13/02/2024
CONSULTATION	16/02/2024	08/03/2024
FINAL CHANGE REPORT ISSUED	29/03/2024	29/03/2024
RESPONSIBLE COMMITTEE DECISION	09/04/2024	09/04/2024
APPEAL WINDOW CLOSURE	23/04/2024	23/04/2024

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9 GLOSSARY

TERM	DEFINITION
BSC	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
CSS	means the Systems and processes provided or procured by the CSS Provider for the purpose of providing the Address Management Service and the Registration Service.
CSS Provider	means the DCC when performing functions under or in relation to this Code (but always excluding its functions under the Smart Energy Code and its roles as CSS Systems Integrator, SI Provider and Switching Operator), including in respect of the Central Switching Service and including in effecting the design, build and testing of any System that will allow it to perform functions under Interpretations and Definitions 22 Copyright 2023 Retail Energy Code Company this Code after the CSS Go-Live Date. This role is the CSS Procurer and Manager function as described in the E2E Data Migration Plan, E2E Integration Plan, E2E Post Implementation Plan, E2E Testing Plan, E2E Transition Plan: Implementation Approach and E2E Transition Plan: In-Flight Switches Approach.
DNO	means a person holding an Electricity Distribution Licence.
DUoS	means a DNO's distribution use of system charges as defined within DCUSA.
ERDS	means the electricity registration services provided under this Code to support the provision of electricity retail data to the CSS and other services.
Market Message	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
MPAN	means the unique reference number used to identify electricity Metering Points.
MPRS	means the System used or procured by each DNO in order to provide the Electricity Retail Data Service in accordance with the REC and / or the Supplier Meter Registration Service in accordance with the BSC.
MRA	means the Master Registration Agreement referred to in the Electricity Supply Licences.
Registered Supplier	means, in respect of an RMP and at any time, the Energy Supplier recorded against that RMP in the Central Switching Service at that time with an Active or Secured Inactive Registration Status (or, in respect of a period of time, the Energy Supplier that had, has or will have an Active or Secured Inactive Registration Status in respect of that RMP during that period).
RMP	means a Supply Meter Point or Metering Point identified in the Central Switching Service.
Terminated	means the RMP Status indicating that an RMP is: (a) in the case of gas RMPs, no longer capable of offtaking gas; or (b) in the case of electricity RMPs, disconnected.