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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0101- REVISION OF THE IMPLEMENTATION DATE AND APPROVED SOLUTION FOR R0021

On 28 April 2023 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0101.

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	COLETTE BALDWIN

DATE CONSULTATION ISSUED	28 APRIL 2023
RESPONSE DEADLINE	16 MAY 2023

Question 1:	Do you agree with the Code Manager's Recommendation to phase the implementation for R0021 and R0101 to between 30 June and 03 November 2023? If not, please explain.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
NGED (DNO)	Yes – we agree with the phased implementation. With testing upon June release, we will know if we can send/receive the 'Y' coded MMs. The area of concern surrounds the approval/implantation of DCUSA CP419 – with the DNO forgoing the pre-notification until the release of this change.	Thank you for your comments, there is no dependency between DCP419 and R0101. The requirement to pre-notify the DNO of planned work by the SIP is conditional upon their being a mechanism in place. DCP419 is only just at the start of its progression through the change process. It's also a solution for more than SIP pre-notifications.
Centrica (Energy Supplier)	We agree with the recommendation to phase the implementation for R0021 and R0101 between 30th June and 3rd November 2023. The original change proposal to facilitate the de-energisation of installations by non-appointed MEMS was raised in September 2021 and to delay the benefits of this change would be unreasonable given required amendments to the original solution suggested by R0101.	Noted
SSE Energy Supply Ltd (Energy Supplier)	Adding the phased approach between June and November adds a layer of complexity, with SIPs having to check which suppliers are compliant before choosing the method of communication. We would have preferred a big bang approach in November, either with the interim solution from June or just the enduring solution.	Noted, however, there are compelling reasons why we decided not to defer implementation to November.

Npower Commercial Gas Limited (Energy Supplier)	Yes, however we are of the opinion that this approach is the only viable way to move forward given the timing of discovering the issues with implementing R0021 original solution combined with the fact that applications for DCUSA accession to become Safe Installation Providers (SIPs) shortly before this change was raised, resulting in SIP's commencing the preparatory work within codes to commence it's service offerings to the public from the intended June 23 release	Noted
Northern Powergrid (DNO)	No. Having a work around to manage service termination equipment defect Market Messages is messy. If many parties aren't yet ready for the change due to issues identified during the webinar, then it would be much cleaner to delay the implementation to November. That said, if we have to, we could facilitate a work around to accept service termination issue reports for a short period of time.	Noted, ideally it would be best to implement in a big bang approach, however, there are more compelling reasons to implement in June than to delay it to November. We have tried to find a solution that is pragmatic. We recognise the importance of these instances being reported so that they can be remedied, however, we don't believe it will be a significant burden on either the DNOs or the SIPs, and removal of the process can be earlier under a phased implementation if you are able to update your systems to accept the new variants of the flows from the SIPs.
EDF (Energy Supplier)	No, we do not agree with the recommendation to phase the implementation for R0021 and R0101. This approach requires significant manual intervention by us as a supplier, and with this comes high risk of error. Postponing implementation until November would give sufficient time for suppliers (including ourselves) to set up our systems to receive SIP sent flows without the need for manual intervention. By implementing in June, it	Noted. We appreciate your comments, however, we have tried to find a pragmatic approach that allows the work to begin when the change is implemented. There will be an enduring requirement to provide a telephone number to deal with emergency metering work, and on balance it was felt better to use

	means the process to set up receipt of the flows will be rushed leaving it vulnerable to mistake. It will also increase the burden on SIPs who will need to take different approaches to sending information depending on which Supplier or SNO they are interacting with.	a phone call to deal with the infrequent reports that will come from the SIP (to report metering faults or possible interference, and the rare Energisation status change) during the interim period, rather than having multiple workarounds.

Question 2:	Do you agree with the suggested workaround proposed for use during the phased implementation period? If not, please explain.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
NGED (DNO)	We agree with the workaround – we have a designated fault line. This is reliant though on a Supplier establishing unique contacts for SIPs to bypass call centre wait times.	Noted, Suppliers are being contacted to provide dedicated telephone numbers as required.
Centrica (Energy Supplier)	We agree that those SIPS that are ready to enter the market on 30th June should be allowed to.	I appreciate that Parties are looking for this information, but it is never made available until the change is approved. It is being

	It is frustrating however that the REC has still not specified the full details of the new Market Message and does not appear to be willing to do this until the June pre-release is issued.	made available the first working day following approval of the Change Proposal.
SSE Energy Supply Ltd (Energy Supplier)	The suggested work around requires a supplier to have a contact available for the SIP to call if there is an issue on site. There is no mention of the hours the contact would be required for and the process if the contact is unable to be reached by the SIP.	Noted, we would expect the Supplier to be available during the normal business hours. Until Change Proposal R0053 provides a solution for a 24/7 metering support, the SIP will have to make the site safe and report the matter to the Supplier at the earliest opportunity.
Npower Commercial Gas Limited (Energy Supplier)	Whilst we are uncomfortable with the position that suppliers will now have to provide additional resource & training requirement to staff to cover the interim process through a combination of phone calls and work references provided by response, which are themselves unlikely to materialise because the SIP is only communicating where an exception has been found we are accepting of the workaround albeit reluctantly.	Noted
Northern Powergrid (DNO)	Notwithstanding our response to Q1, If a work around is accepted then, yes. However, it should be noted that in the phased implementation approach document (SIP work completion market message section), it references that the DNO requires the SIP to pre-notify them of planned SIP work. Whilst a DCUSA change proposal is being worked up for this enduring requirement to create/amend a data flow (DCP419), it is not necessary for the SIP to notify NPg as a workaround during the phased implementation period as the data flow for this purpose is not available yet.	Noted

EDF (Energy Supplier)	No. As stated in our answer to Q1, by implementing early we will be having to introduce a manual intervention process as now our systems do not recognise the SIP Dataflows. Again, by implementing this way it leaves a huge margin for error and potential risk to both the supplier and consumer. We disagree that all communication between the SIP and the supplier/DNO should be by telephone. This mechanism should only be used in emergency situations, such as Category A incidents or immediately dangerous meter faults. All other communication (for example regarding energisation status or consumer vulnerability) should be by e-mail as this will be more robust, more auditable, and avoid the need for suppliers to set up dedicated phone lines for what may be small volume of contacts, or to train all of their customer service agents to handle such calls.	The SIP reporting to the Supplier incidents of danger, damage or interference should be much more of an exception process and therefore a proportionate approach to the workaround needs to be provided during the interim period. Suppliers need to provide an enduring telephone number to receive reports of danger – as these will never be sent by flows, so, rather than put multiple approaches in place, a phone report seemed the most appropriate. We ask that you recognise that this is a short-term solution that allows Consumers to benefit from a new service provided by the SIPs.

Question 3:	Do you have any questions or concerns related to implementing any of the Market Messages required by the solution? Please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
NGED (DNO)	We are supportive of this release – only concerned with the speed at which DCUSA 419 can be implemented to match.	Noted, however, there is no dependency between this change and DCP419, as stated above.
Centrica (Energy Supplier)	We question the value of sending the new Market Message notifying the registered electricity Supplier that SIP work has been carried out prior to November 2023. SIPS will need to manage/suppress these messages for those parties that are not ready to receive the message during the phasing period. This will mean additional complexity and cost. Given that the seals on the installation will provide an audit trail of this work we suggest that the new market message should be introduced from Nov 2023 for all parties.	Noted, we agree that this is a pragmatic approach for the interim period, and that the risk is very low.
SSE Energy Supply Ltd (Energy Supplier)	As a supplier we still do not have any details on the market message / dataflow number. We need to make changes to our system to accept the new dataflow and the new agent role of SIP. The longer the delay in providing this information the more likely we will be reporting that we will need the whole of the implementation window to be compliant, with any problems from the interim workaround highlighted previously.	We have provided details of the Market Messages in the Solution Overview document with R0101 and in the legal text. Actual scenario variant numbers will be shared on the 30 May, along with the contents of the new Market Message when the Pre-Release information is shared. This

		cannot be provided until the Change is approved.
Npower Commercial Gas Limited (Energy Supplier)	Not at this stage.	Noted
Northern Powergrid (DNO)	During the work around period the SIP will not receive a D0126 for job outcome as processes and system changes will not be adequately in place. Therefore, the SIP will have to develop their own process to determine when to return to site.	We expect the DNO and the Supplier to notify the SIP by telephone during the phased implementation period, if the SIP advises they have not completed the Safe Isolation Work. If the SIP has been able to do the complete their activities, there will be no need for the DNO or the Supplier to contact the SIP.
EDF (Energy Supplier)	Yes – Our main concern is over the need for the new SIP outcome data flow. Is this really required if it is an information only flow?	Suppliers required this during the solution development, to give them an audit trail of work undertaken at their meter which wasn't initiated by them or the DNO.

Question 4:	Regarding the workaround – we have proposed the SIP contacts the Supplier or the DNO to report danger, damage, or interference, and to notify the supplier of De-energisation and re-energisations where this occurs beyond the end of the working day. The method suggested is by telephone for organisations utilising the extension period to implement the Market Messages. Do you agree with the method chosen? If not, why not?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
NGED (DNO)	The workaround works in theory – but is reliant on a robust directory of industry standings – so that a Sip knows whether to call or send a message.	Noted, we are in the process of preparing to collect all the necessary contact information.
Centrica (Energy Supplier)	Given that these notifications will be by exception and not high in volume we agree that these can be reported by telephone during the extension period.	Noted
SSE Energy Supply Ltd (Energy Supplier)	We would prefer an email to contact suppliers for when the supplier contact may not be available at night. An email will be available first thing in the morning for a supplier to take the necessary steps. Any delay in the SIP phoning the customer the next day might result in the supplier arranging unnecessary site visits.	Noted
Npower Commercial Gas Limited (Energy Supplier)	Supplier's ability to manage inbound calls from SIPs are generally limited to office hours which is a gap in the proposed workaround wherever out of hours work is to be conducted by the SIP, for which we perceive is quite likely from the opening of R0021/DCP394 in June wherever non-domestic customers procure SIP services, primarily this enables the customer to avoid an impact on their daily business operations.	Noted

	As such we feel that it should also require suppliers to provide email addresses within the workaround period with a SLA (EG 1 working day) to return back to the SIP the required reference number, this can be managed through agreed password protection file exchanges & email encryption in order to ensure that data is appropriately protected in the interim.	
Northern Powergrid (DNO)	Yes, though as mentioned in previous question, the SIP will not receive confirmation of job outcome from DNO.	Response as above to question 3.
EDF (Energy Supplier)	No. – As noted above, we do not agree with implementing the market messages in June. Also, where parties are not able to use market messages, the use of phone calls for non-Category A emergencies is not easily managed or resourced. Instead, we would encourage the use of an email service to provide updates on outcomes where the issue is not time critical. This is easier for suppliers to manage, and less resource or training will be required.	Response as above to question 3.

Question 5:	The mechanism to advise the Supplier that communications on the smart meter could not be re-established. We have proposed that the SIP should telephone the Supplier, however, a D0002 could be used instead. Please indicate which option you prefer, and why	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
NGED (DNO)	If a D0002 can be sent – this would be preferable, as we recognise that a Supplier cannot always dedicate a phone line to this.	Noted
Centrica (Energy Supplier)	A Market Message would seem a better solution in the longer term to minimise call handling costs and ensure consistency of provision of data.	Noted
SSE Energy Supply Ltd (Energy Supplier)	As a supplier we receive many D0002 flows on a daily basis. Any D0002 sent indicating issues with Smart meter comms will not be able to be prioritised amongst all the D0002 flows received for other reasons. As mentioned above an email to a specific mail basket is more like to be picked up sooner than a dataflow or telephone call.	Please note, while the requirements for a telephone number for the workarounds is a temporary solution, this is the enduring solution.
Npower Commercial Gas Limited (Energy Supplier)	As above we do not see why a controlled email could be used in conjunction with phone calls, as it may be likely that some suppliers may not be ready to accept the D0002 dataflows from the SIP, however the use of D0002 proposed appears to be consistent with that approved under R0021 so where suppliers are ready to accept an inbound D0002 from the SIP this should also be suitable.	There needs to be an enduring mechanism for SIPs to contact Suppliers to alert them to instances of dangerous metering situations found on the SIP Visit. This requires immediate attention and can't be sent by flow or email. On this basis as at least one telephone number is an enduring requirement, so rather than putting in place

		telephone and email contacts, and then removing the email contacts from November, it seemed more sensible to make any contact by phone in the interim.
Northern Powergrid (DNO)	This communication is between SIP and Supplier so, as a DNO, we have no opinion	Noted
EDF (Energy Supplier)	We would prefer the D0002 flow as this will provide an audit trail. This avoids the need for suppliers to provide and staff telephone lines for an issue that is not generally urgent, can't be resolved immediately, and in some cases will resolve itself if the comms issue is a temporary one. Instead, we again suggest, that an email option is explored or ultimately the implementation is pushed back to November to allow additional time to improve process' and reduce manual intervention.	Noted

Question 6:	We have recommended not sending the SIP Work Completion information during the phased implementation to those using the workaround, do you agree with this approach? If not, please provide your rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
NGED (DNO)	Assuming that works are completed (as stated) within the working day window – this information would not be needed.	There is no expectation that the Work Complete flow will be sent to the DNO. Should this be required (after DCP419 is

		introduced), it will require a separate REC change.
Centrica (Energy Supplier)	We question the value of sending the new Market Message notifying the registered electricity Supplier that SIP work has been carried out prior to November 2023. SIPS will need to manage/suppress these messages for those parties that are not ready to receive the message during the phasing period. This will mean additional complexity and cost. Given that the seals on the installation will provide an audit trail of this work we suggest that the new market message should be introduced from Nov 2023 for all parties.	Noted
SSE Energy Supply Ltd (Energy Supplier)	The work around for suppliers to contact the DNO for information that the SIP has been on site will require DNOs to provide contact details for the responsible party that will keep a record of this information. This will potentially create additional work for suppliers and DNOs and will not produce the answers in a timely manner. This could result in additional site visits to establish what has happened on site. If a dedicated email was used, then we believe the SIPs would be able to inform Suppliers of the work completion information.	Noted, however, this applies only to the interim period between June and November, post November, the information will be sent in a Market Message.
Npower Commercial Gas Limited (Energy Supplier)	We do not agree with this approach – we feel that a SIP can provision this information via wither password protected email communications, or given they are also existing MEM's via SDEP if there is feasible existing SDEP message that could be used.	Noted. MEMs do not have access to SDEP and there are no plans to make SDEP available as a solution to the MEMs in the foreseeable future.

	Whilst we understand the suggestion for interim processes, we are concerned that the DCUSA liabilities regarding safe working on the distribution connection point provisioned via DCP394 would automatically default the lichened supplier in the event a safety issue resulted in damage (E.G building caught fire) to a building as consequence of unsafe working practices conducted by the SIP. Whilst we hope this situation would not arise and acknowledge SIP's have to be MEM qualified, supplier appointed MEM's do not carry these liabilities and are passed through to the supplier for whom appoints the MEM to do such work under the current arrangements, so in the unlikely event suppliers are not informed that SIP work has been conducted and was the last party to work on the connection point we would not have any way to evidence that was the case, so consequently means the interim process as proposed in this regards places the SIP's liabilities on suppliers despite the DCP394 solution provisions (as per section H clause 52Z.11) the transfer of such public liabilities to the SIP.	In terms of the visibility of the SIP being on site. The SIP will use their own sealing pliers which will help with identification in the short term. Recognising that the circumstances you've outlined are a risk, we do not consider them to be a material risk, and therefore we have suggested a pragmatic approach for a short interval.
Northern Powergrid (DNO)	This communication is between SIP and Supplier so, as a DNO, we have no opinion.	Noted
EDF (Energy Supplier)	Yes. However, this does raise the question – if the information is not needed now, why will it be needed in November? If it is for information only and	Noted. See our response to Q3 comment.

	there are no issues with the meter then this information has no use. As a supplier we only need to be made aware where an issue has arisen which, suggested in the solution outcome document, will be done via additional flows.	

Question 7:	Do you have any further questions or comments on this solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
NGED (DNO)	Although we as a DNO need the release from DCUSA, we support this change, and the proposed workaround in the interim	Noted
Centrica (Energy Supplier)	<u>Phased Implementation Approach</u> Page 1 – Party Register – to reduce the burden on all parties we think the revised list should only be published say once a week/fortnight ready for Monday otherwise it would require parties to check every day. <u>Solution Overview</u> General – SIP is defined but not SIF. Page 3 – last row – it does not say it explicitly but implies the Supplier will need to notify the SIP once the issue has been fixed. The next row says the Supplier doesn't need to notify SIP.	Page 1 – We agree that daily updates are not appropriate. The Plan is to publish updates and remind parties of the updates in the Weekly Bulletin as they change. Thanks for identifying this. Page 3 – There are two suggested actions for the SIP, one where the SIP completes the SIP work, and doesn't need to have the report of remedy sent to them, and one

	Page 4 – 3 paras after table – no mention is made of gas first where the SIP may need to advise the gas supplier that the comms hub is not working post SIP work. Page 8 – The process needs to show the final steps which includes the SIP being added to MDD because until that occurs the MPID/Role Code will not be a valid combination. Page 11 – needs to include gas supplier to cater for gas first. Page 12 – New MM – in line with previous the MRA change process this should be shown as MMnnnnn – D039n – 'name of flow'. his method also caters for changes that may introduce more than one new message. <u>Redlined</u> 21.6 – this needs to be amended to cater for gas first installations where the SIP will need to notify the gas supplier.	where the SIP can't complete the work until the Supplier remedies the fault, and therefore needs to be advised when it is resolved. We will add the inclusion of the requirement to state which in the Additional Information Field. Page 4 – We identified the same after the PCR was issued, so it will be included in the FCR. Page 8 – We included the DCUSA process in our process maps because of the interactions between the REC and DCUSA to validate information before accession can be completed, however, the BSC process is a stand-alone one and has no direct interaction between REC and BSC but is something the Parties need to do themselves. We have however, made reference to it in the Solution Document. Page 11 – We have not made Supplier fuel specific, but we will include information in the Solution document to call this point out. Page 12 – I will share this feedback with the technical data architecture team.

SSE Energy Supply Ltd (Energy Supplier)	We would have preferred a big bang approach in November using the eternal solution. This would have provided all parties the time to get their systems and processes in place and not have to put in additional measures for an interim solution.	Noted, however, there are compelling reasons why we decided not to defer implementation to November.
Npower Commercial Gas Limited (Energy Supplier)	n/a	-
Northern Powergrid (DNO)	No	Noted
EDF (Energy Supplier)	We would like to reiterate the need to delay the implementation date of this change to ensure a better and more refined process for all. At this point in time the process overall feels rushed and not best for either the supplier, the SIP, or the customer. It is concerning that there appear to be a number of REC changes, like this one, where the original solution has been approved and then a further CP needs to be raised to either amend the approved solution, delay the implementation date, or both. Rather than getting changes right first time, unnecessary time and effort is being spent by REC Parties and by the REC Code Manager to fix approved changes. It appears that there is a problem in the REC change process, it would be useful to understand what the REC Code Manager is planning to do to improve the process and address these concerns.	We note your concerns, however, there are more compelling reasons to implement the solution as per the implementation date agreed by Ofgem in R0021 than to delay the implementation of this change to November. We understand your concern about the changes that have been needed to rectify changes and solutions that have been previously approved, and the Code Manager has undertaken a review and is introducing more internal assurance of the technical changes to avoid future remediation Change Proposals for all changes.