RETAIL ENERGY CODE

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

CHANGE REPORT

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

CHANGE REPORT	PRELIMINARY
DOCUMENT VERSION	2.0
ISSUED DATE	28/04/2023
DOCUMENT APPROVAL STATUS	APPROVED

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL	CHANGE PATH	SELF-GOVERNANCE
PRIORITY STATUS	HIGH	URGENCY	URGENT

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	28/04/2023

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CHANGE OVERVIEW

Change Proposal R0021 was approved for implementation on 30 June 2023. Some concerns with the Market Messages were expressed by Parties while preparing to implement the Change and so this Urgent Change Proposal progresses changes to the Market Messages and adds additional clarity to the solution, so that the June implementation date can still be achieved.

	High Impact: Metering Equipment Managers, Distribution Network Operators
	Medium Impact: Suppliers
	Low Impact: N/A

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0101 is **APPROVED** for implementation on 30 June 2023.

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BACKGROUND

1 BACKGROUND

Currently only the Registered Supplier can instruct a Metering Equipment Manager (MEM) to work on their Metering Asset. Change Proposal R0021 will allow REC Accredited MEMs, acting as Safe Isolator Providers (SIPs), to provide services directly to the premise owners, outside of the Registered Supplier to MEM relationship. This change, together with the related Distribution Connection and Use of System Agreement (DCUSA) Change (DCP394), was approved by the Authority for implementation on 30 June 2023. In readiness for the release and implementation of R0021 (Allowing REC accredited MEMs to De-energise and re-energise supply points independent of the Supplier) an industry webinar was held on 02 March 2023. Questions regarding the approved solution were raised by Parties. The Code Manager has reviewed these questions and determined changes are required to the approved solution.

2 PROBLEM STATEMENT

Following an implementation webinar for R0021 on 02 March 2023, several matters were raised by Parties regarding the solution and Market Messages that the Code Manager needs to address to ensure that the solution approved by Ofgem can be implemented successfully.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As a premise owner I want to be able to contract with a SIP, and for the SIP to be able to provide the service in a fully compliant manner.
MARKET PARTICIPANT USER STORIES	
M1	As a REC MEM who wants to operate as SIP, I need clarity on the solution and Market Message requirements when I provide Safe Isolation Works to premise owners
M2	As a Registered Supplier, I need clarity on the solution and Market Message requirements when my Consumers have Safe Isolation Works completed at their Premises by SIPs.
M3	As a Distribution Network Operator, I need clarity on the solution and Market Message requirements when my connected parties have Safe Isolation Works completed at their Premises by SIPs.

4 SUMMARY OF ANALYSIS UNDERTAKEN

Following the implementation webinar on the 02 March 2023, a full review of the solution and the Market Messages was undertaken, in the light of the questions raised by Parties. The following table sets out the findings of that analysis. (For the items not yet provided by the Code Manager – these are normally provided during the pre-release stage and not as part of the final, red-lined legal text.)

MM NO	TOPIC AREA	AS PER R0021 FCR	PROPOSED IN R0101
New Market Message	Message Number, Legacy Number, All Group ID & Scenario Variant Numbers	None of these items were provided in the FCR Legal Text	Will be included in Pre-Release information
	SIP ID	Data Item reference not created for flow	Will be included in Pre-Release information
	Flow description	This was published as: This flow confirms that the Energisation Status of a metering point has been changed, or notifies that the terminals of the meter and associated equipment have been adjusted	Amended to: This Market Message is for the SIP to confirm the outcome of work undertaken on a site visit
	Scenario Variant Name	Published as: Confirmation of change or adjustment to Meter or Terminals	Amended to: Confirmation of completed SIP work
	Address Group	Insufficient lines in group (only 2 populated, plus a line with just leader dots for subsequent implied lines)	All usual address lines in an address group are now included
	Address Lines	Data Item: address line J* Data Item reference not included in the table of Data Items in the flow in the FCR. (Address Line J Data Items are usually J0126-J1034)	The Code Manager has decided to change the use of J0136-J1044 Data Items for address – using 'meter point address' rather than 'address' (Data Items J1026-J1034)
		L4 item indicated as Mandatory, which is incorrect and should be optional	Provision of the data is O now (optional) – which is reflective of how this data is usually presented, as not all fields can be populated, depending on the address structure.

MM NO	TOPIC AREA	AS PER R0021 FCR	PROPOSED IN R0101
	Post Code	Data Item not included (for Post Code for Address Lines 1026-J0134 this should have been Data Item J0757)	Data Item J0263 has now been included as it is the Metering Point Post Code, which aligns with Meter Point Address J Data Items (J0136 – J0144)
	Read Details Group	Included in the flow, however, Range is incorrect, it should have been 0-* to allow for multiple metering, and multiple register situations	On review, it was determined that this was not actually required, as reading information is only provided when re-energisation has not occurred on the same day as De-energisation, and reading details are included in the D0139 – so this is a duplication and will be removed
	PSR Details	PSR Details Group was included which allowed for the PSR Category and the Consent to Share data Obtained flag	The information the SIP collects as part of their risk assessment, related to a medical dependency on electricity or the requirement for a third party to be present when the work is carried out, will be confirmed as "SIP Additional Needs Information" It is not a formal PSR update, and should not be considered as such.
MM00013/ D0002	Scenario Variant	Included SIP to Supplier variant, but didn't include a variant from the Supplier to the SIP for resolution reporting	New variant now included.
	Scenario Variant Reference No	Not Included	Will be included in Pre-Release information
MM00016/ D0126	Scenario Variant Reference No	Not Included	Will be included in Pre-Release information
MM00023/ D0135	Scenario Variant Reference No	Not Included	Will be included in Pre-Release information
MM00029/ D0136	Scenario Variant Reference No	Not Included	Will be included in Pre-Release information
MM00036/ D0139	Scenario Variant Reference No	Not Included	Will be included in Pre-Release information
	Recipients of the Flow	SIP to MEM was included in the red lining for the flows in R0021, but not in the solution	Confirmed as not required and updated into solution

MM NO	TOPIC AREA	AS PER R0021 FCR	PROPOSED IN R0101
Standards Definition Document	Data Service	Not Included	Now added SIP as a Data Service Provider

Pre-Release information is expected to be published immediately following approval of the Change Proposal.

In terms of questions related to the solution, the following table sets out some additional information to address questions raised during the implementation webinar.

TOPIC AREA	R0021 – FINAL CHANGE REPORT	R0101 CHANGE PROPOSAL
Process Maps	R0021 – Business Process Maps were included, but at a slightly higher level and did not include Market Message Reference Numbers relating to the different elements of the process	R0101 – Detailed Business Process Maps have been provided, which covers the interactions between REC, DCUSA, and the BSC. They include lower-level details and include flow numbers
Solution Description – Assurance	SIP activities covered by MEM audit arrangements	Clarity requested on any non-conformity or escalations. The audit process as it applies to MEMs will also apply to the SIP activities. This includes the standard audit and assurance arrangements, including escalation activities conducted by the PAB (as necessary)
Detailed Impacts Table	Additional flows were included in the Final Change Report – detailed impacts table; however, they should have been removed from the table as they were not part of the solution set out, nor were they provided in the red-lined legal text and Market Messages published: • MM00001 – D0001 Request Metering System Investigation • MM00168 – D0005 Instruction on Action • MM00257 – D0010 Meter Readings • MM00156 – D0268 Half Hourly Meter Technical Details	The use of these Market Messages **is not part** of the solution and are therefore not included in the updated Solution document, business process maps, or Market Message proposed changes, and should be disregarded

5 PROPOSED SOLUTION

Included with this report is a detailed solution document, setting out the end-to-end solution, together with detailed business process maps and proposed Market Messages. The solution document can be accessed here. Following implementation of the proposal, the contents of the solution document will be maintained as guidance, available within the REC Wiki on the REC Portal.

In R0021, the process maps were included within the change report, however details within the process maps were not included in the legal text. Interface tables are being included within the R0101 legal text to address this.

The solution proposed under R0021 provided for the introduction of the SIP role and the DCUSA Change Proposal DCP 394 defined the Safe Isolation Works permitted. This Change Proposal does not alter the intentions of the solution but does provide clarity over the Market Messages to be used in the process. Process maps have been drafted to a lower level of detail than were provided in the original R0021 proposal, to provide greater clarity on the requirements and interactions.

We would like to draw your attention to two matters that have arisen during discussions on this Change Proposal:

1. Priority Service Register (PSR) information

The SIP is not responsible for collecting and/or validating PSR information related to the Metering Point. There are licence obligations on Suppliers and DNOs to establish and maintain the PSR. The premise owner (where they are not the occupier) will confirm with their occupier that there is no medical dependency on electricity that will make it unsafe for the occupier if the SIP were to carry out the Safe Isolation Works without other arrangements being put in place to safeguard the occupier. Additionally, the premise owner will also verify if there is a need for a third party to be present before the SIP can attend the premises. The premise owner will obtain the consent of the occupier to share both of these SIP Additional Needs Information with the SIP and with the occupier's Registered Supplier, and the SIP will retain evidence of the same.

The Supplier should treat the information as 'additional information', and they should consider and determine whether they need to act on the information, and not regard it as a formal PSR update.

2. The Market Message related to the MM00036/D0139 - Confirmation or Rejection of Energisation Status Change.

During normal operation of the metering point, the Supplier's MEM or the DNO may install, remove, commission, replace, or repair a metering asset, and consequently the MM00036/D0139 is used to confirm the change of energisation status between the DNO, the Supplier and the MEM – as appropriate. During industry engagement we were asked to include a variant of this flow into the Safe Isolation Works process from the SIP to the Supplier (only where the supply was left De-energised beyond the end of the working day), so that it would

enable the Supplier to have the option to instigate any investigation into settlement issues that may occur during the period of that De-energisation.

It was expected that the use of this flow by the SIP was likely to be minimal, since the DCUSA legal text requires the SIP to complete De-energisation and re-energisation within the same day. The consideration of wider processes that might take place when the flow is utilised in the usual day-to-day MEM, Supplier and DNO activity were determined to be out of scope for this solution, therefore, no other new instances of this flow from the SIP to any other party were included in the solution. Unfortunately, there was some confusion on this point in the R0021 redlined data flow, which erroneously included a variant from the SIP to the MEM, but that was never detailed as being within the scope of the solution or the business process maps. It was an intentional decision, based on a highly unlikely theoretical scenario, and the concern around the MEM having to build exception processes to stop the processing of the SIP to MEM instance of the flow, if the MEM had already resolved the De-energisation because of other activities, before the SIP to MEM D0139 had been processed by the MEM.

In order to validate the assumptions that have been made in this respect, we are proposing that a post implementation review should be conducted to monitor the use of the D0139 flow and determine whether there is a value in introducing a scenario variant of the D0139 to be sent between the SIP and the MEM.

CROSS CODE IMPACT

There is no impact to the DCUSA Change Proposal DCP394 from implementing this Change Proposal.

6 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0101 can be found here. These are summarised as:

- Changes to **Schedule 14 – Metering Operations** that set out the processes and rules that the SIP should follow;
- The inclusion of a new item in the **Energy Market Data Specification Standards Definition** document, to include the SIP as a valid Data Service;
- An updated new Market Messages to be issued by the SIP when the Safe Isolation Works are complete; and
- Complete Scenario Variants for the following Market Messages

  MM00013/D0002

  MM00016/D0126

  MM00023/D0135

  MM00029/D0136

  MM00036/D0139

7 KEY RISKS, ASSUMPTIONS, AND DEPENDENCIES

7.1 RISKS

No.	RISK	NOTES	MITIGATION
R0101.PCR.001	Not all parties will be able to meet the implementation date of 30 June 2023	We have previously indicated we may delay the implementation of R0021, however, that decision has been reversed on further assessment.	Parties will be asked during Consultation whether they can meet the June implementation date, or a later date during a phased implementation approach.
R0101.PCR.002	A manual process will need to be introduced for instances where the phased implementation approach is adopted by Parties.	There is a low risk of instances where Suppliers may not be informed of metering faults or changes of energisation.	The risk is low, the SIP (as an Acceded MEM) is obligated to comply with Consolidated Metering Code of Practice, and therefore any non-compliance would be addressed through the normal MEM assurance activities.

7.2 ASSUMPTIONS AND DEPENDENCIES

REF.	ASSUMPTION	NOTES	WHEN TO VALIDATE
R0101.CPP.A001	BSC MDD Change will be approved	The MDD CP (M4256 was approved on 04 April 2023.	BSC approved this change on the 04 April 2023, and it went live on 19 April 2023.

REF.	DEPENDENCY	NOTES	STATUS
R0101.CPP.D001	DCP394 will be deferred for implementation to November 2023	We have asked DCUSA to defer implementation of their approved Change Proposal.	A decision to defer the implementation date has been reversed. The

			dependence is therefore removed.

8 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	30/06/2023

PROPOSED IMPLEMENTATION APPROACH	PHASED

A phased approach to implementation is proposed, this will see Parties who can achieve the 30 June implementation date make the necessary revisions to the proposed Market Messages under this Change Proposal to fully implement the Change. However, for Parties who cannot achieve implementation of the Market Message changes by the 30 June, a further period will be allowed for the delivery of the Market Messages element of the Change Proposal, and an alternative workaround to manage the communication requirements between the SIP and the other REC parties will be implemented. All Parties should be fully compliant with the Change Proposal by 03 November 2023. Information on the alternative workarounds will be shared as part of the release activities.

9 BUSINESS CASE ASSESSMENT

9.1 BENEFIT

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
[INTANGIBLE BENEFITS]	Greater clarity on the solution for R0021 will ensure that the change can be implemented with more confidence. This will ensure that all affected Parties are clear on the process, and what communications to expect to send and receive at the appropriate stages.

9.2 COST BENEFIT ANALYIS SUMMARY

There are no central costs to implement the solution under R0101 since this formed part of the R0021 case for change. The change clarifies the contents of the Market Messages and provides more time for Parties to implement the solution. The delay should ensure that the change is implemented with greater confidence on the requirements.

10 CASE FOR CHANGE

The Code Manager considers the solution appropriately resolves the problem statement. There are no additional costs being incurred to implement the solution. In implementing this Change Proposal, it provides the clarity on the solution and addresses the defects which were identified by REC Parties after the R0021 change was approved. The implementation of this change will

enable the intent and benefits of R0021 and DCP394 to be realised, and therefore delivers a positive benefit to Parties and Consumers.

Based on this, the Code Manager believes there is a case to make the change.

11 CODE MANAGER'S RECOMMENDATION

Based on the assessment in section 9 and 10 of this report, the Code Manager considers there is a positive business case for the implementation of this Change Proposal and recommends that:

the Metering Expert Panel:

- **Approves** the proposed change solution.
- **Approves** the proposed implementation approach.
- **Approves** the proposed implementation date of 30 June 2023

12 CONSULTATION PLAN AND NEXT STEPS

The consultation on this Preliminary Change Report for R0101 will be published on the REC Portal on 24 April 2023 for the Metering Expert Panel's review and will be released for industry consultation on **28 April 2023,** which will close on **16 May 2023**

A webinar event will be hosted by the Code Manager on the 09 May 2023 (the mid-point of the consultation window) to allow Parties to clarify any matters prior to their submitting their consultation response. The Code Manager will publish details of this, and how Parties can register.

Following consultation, the Code Manager will produce an updated version of this Preliminary Change Report (referred to as the Final Change Report). This will include the outcome of the consultation, setting out a summary of the consultation submissions and the Code Manager's response.

The Final Change Report will be issued to Metering Expert Panel to make its determination.

13 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
ANY OTHER DOCUMENTS / LINKS	Solution Overview

RETAIL ENERGY CODE

14 GLOSSARY

TERM	DEFINITION
Distribution Connection and Use of System Agreement (DCUSA)	means the agreement of that name maintained pursuant to the Electricity Distribution Licences.
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Energy Market Messages	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.
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.
Market Domain Data Role Code (MDD Role Code)	means data which relate to Supplier Volume Allocation to be provided by the SVAA to all persons involved in Settlement in accordance with BSCP509;
Premise Owner	The person who owns the premises who may or may not be the person who enters into a contract with a Registered Energy Supplier.
Priority Services	is to be interpreted by reference to the licence obligations of the relevant Party, and therefore has the meaning given in: a. Electricity Supply Licence Condition 26; b. Gas Supply Licence Condition 26; c. Electricity Distribution Licence Condition 10; and d. Gas Transporters Licence Condition 17.
Registered Supplier	means, in respect of an RMP and at any time, the Energy Supplier recorded against that RMP in the relevant Switching Data Service at that time with an active registration status (or, in respect of a period of time, the Energy Supplier that had, has or will have an active registration status in respect of that RMP during that period).
REC Accreditation	means the process by which a Metering Equipment Manager is recognised as fulfilling the requirements of the Consolidated Metering Code of Practice, which may include an audit process in accordance with the Metering Accreditation Schedule. "Accredited", “Approved” and similar expressions shall be interpreted accordingly.
REC Performance Assurance board (REC PAB)	means the performance assurance board for this Code, as from time to time established under Clause 15 of the main body of this Code (which is a Sub-Committee).
Safe Isolator Provider (SIP)	A REC Accredited MEM who can undertake a limited range of activities, including de-energising and re-energising a site on the instructions of a property owner and not the Registered Supplier.
SIP Additional Needs	Information related to a medical dependency on electricity, or the requirement for a third-party to be present when work is undertaken.

TERM	DEFINITION
Information (SIP ANI)	