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CHANGE PROPOSAL PLAN

R0152 – REVISION TO THE CONSOLIDATED METERING CODE OF PRACTICE (COMCOP)

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RESPONSIBLE COMMITTEE	CHANGE PANEL

CHANGE PATH	SELF-GOVERNANCE

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS
TO BE DETERMINED

LEAD CHANGE ANALYST



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CHANGE OVERVIEW

Following the implementation of the Consolidated Metering Code of Practice (CoMCoP) a number of issues have been identified by RECCo, The Code Manager and REC Parties, stating that REC Parties are unable to meet their obligations as currently presented in the CoMCoP. The Code Manager has reviewed these and determined changes are required.

KEY MILESTONES

	FROM	TO
SOLUTION ANALYSIS AND DEVELOPMENT	In progress	31/10/2024

1 SCOPE

1.1 IN SCOPE

This document details the plan for the review and revision of the CoMCoP, building on the work done in R0047 and R0084.

The Change Proposal will be an end-to-end review of CoMCoP and potentially touch on other documents such as accession forms. The Code Manager will use R0064 as the baseline CoMCoP document to ensure all changes made under that Change Proposal are captured.

1.2 OUT OF SCOPE

This process does not aim to introduce new processes or obligations to REC Parties. It will ensure their current obligations are clear for both themselves and the Metering Scheme Auditors, and remove any erroneous obligations currently listed under them.

This document does not include milestones past solution development as until this has begun it will not be possible to accurately determine how long will be required to complete the review and develop the revised legal text.

2 REQUIRED ACTIVITIES AND STAKEHOLDER ENGAGEMENT

2.1.1 CROSS-CODE ENGAGEMENT

There are no cross-code impacts associated with this Change Proposal.

2.1.2 ANALYSIS

Analysis has been conducted by RECCo and submitted to the Code Manager alongside the Change Proposal. It has been confirmed this analysis is not a full end-to-end review so this will be built on throughout solution development.

2.1.3 SOLUTION DEVELOPMENT

Solution development will comprise of an end-to-end review of the CoMCoP and associated legal text changes. Over 90 changes have been identified so far only looking at clauses being assigned to the incorrect Party (both assigned when they should not be, and clauses that should be assigned but are not).

The review will consist of (but will not be limited to if more issues are identified):

- Ensuring all clauses are assigned to the correct REC Parties,
- All section headers are correct,
- All clauses are in the appropriate section,
- Removing duplication within and between sections,
- Ensuring all items from the previous codes have been carried over to the CoMCoP.

The scope will also include other documents within the REC such as the Accession documents and Business Solution Assessment forms. REC Schedules that mention the CoMCoP will also be reviewed to ensure that any specific clauses mentioned are correctly referenced.

This has meant that the Code Manager has drawn up a lengthy solution development period as the scope of this review requires it. A phased implementation approach was considered but the initial Service Provider impact assessment with the Metering Scheme Auditor confirmed their preference for an all-in-one approach. The derogation is in place from the Performance Assurance Board (PAB) and the Code Manager will be presenting an update to PAB on a

monthly basis. Based on this and the input from the Metering Scheme Auditor, it has been determined a phased approach is less desirable.

This review will be done by a core working group of Subject Matter Experts (SMEs) from the Code Manager, RECCo and REC Parties. The make-up of this group will be fluid and change over time to ensure that the appropriate SMEs are available for the various topics, as the Code Manager recognises that it is unlikely that one person will hold knowledge of all topics covered in the CoMCoP. Once the initial review is complete and draft updated legal text available, sessions will be held with the Metering Scheme Auditor and with the wider industry prior to impact assessments.

2.1.4 IMPACT ASSESSMENT

Once solution development is complete, impact assessments will be required from the Metering Scheme Auditor and REC Parties. The Code Manager will assess whether an extended impact assessment period is appropriate at this stage, as there are expected to be a large number of changes.

At this time, it is not possible for the Code Manager to set the timetable for these activities.

2.2 RAID

2.2.1 RISKS AND ISSUES

REF.	RISK	NOTES	MITIGATION
R0152.CPP.R001	The scale of required changes is larger than initially thought at the start of solution development.		A structured solution development plan with clear industry engagement points to be developed. Change Proposal Plan not to plan past solution development until scale of change is understood.

2.2.2 ASSUMPTIONS AND DEPENDENCIES

REF.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
R0152.CPP.A001	The proposed changes will have no impact on REC Party obligations.	To be considered and captured throughout solution development.	This will be validated during the Party impact assessment.

REF.	DEPENDENCY	NOTES	STATUS
R0152.CPP.D001	Metering Scheme Auditor may require go live to align with the start of the audit year.	Clarity requested in Service Provider initial impact assessment.	Closed – the Metering Scheme Auditor have confirmed in the initial impact assessment go live does not need to align with the start of a new audit year.
R0152.CPP.D002	Derogation is accepted for the known errors.	Derogation presented to PAB on 28 November 2023.	Closed – a temporary derogation was accepted The Change plan will be shared to determine the agreed derogation timescales.
R0152.CPP.D003	R0064 is approved as that is being used as the CoMCoP baseline.		