RETAIL ENERGY CODE

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CONSOLIDATED IMPACT ASSESSMENT RESPONSES

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

On 10 October 2024 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for R0152 Revision to the Consolidated Metering Code of Practice (CoMCoP).

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	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	10/10/2024
RESPONSE DEADLINE	15/11/2024

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes we agree, however we added a second document to upload for you to review with some grammar issue.	Thank you for your comments.
EDF (Energy Supplier)	Overall we agree with the proposed solution, however as noted in the response to question 3 we have noted some comments on the draft legal text.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No further comments other than answered in the questions.	Thank you for your comments.
E.ON Next (Energy Supplier)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	We have identified some corrections which have been listed under Q3 below.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We welcome this review of the Consolidated Metering Code of Practice (CoMCoP). We believe it is essential that the CoMCoP and the wider Code are as clear and effective as possible. It is important that Parties adhere to, and are in a position to adhere to, their responsibilities under the CoMCoP and the wider Code. We are broadly supportive of the proposed amendments to the CoMCoP.	Thank you for your comments.

SSE Energy Supply (Energy Supplier)	We feel the proposed solution clarifies many existing COMCoP clauses but introduces no tangible difference to the original COMCoP document	Thank you for your comments.
BUUK (Distribution Network Operator)	No comments or observations to these solutions.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	SPEN has collaborated and contributed to the outputs of this solution.	Thank you for your comments.
ENGIE (Energy Supplier)	No.	n/a
Siemens (Metering Equipment Manager)	We have comments on a couple of individual CoMCoP requirements, listed in question 10.	Thank you for your comments.
Stark (Meter Asset Provider)	The changes and adjustments are acceptable in general. We would like to see the new Audit template when the draft CoMCOP is approved.	Thank you for your comments. Wilcock in their role as the Metering Scheme Auditor have completed a Service Provider impact assessment to update the audit once R0152 is approved.
Stark Connect (Metering Equipment Manager)	The changes and adjustments are acceptable in general. We would like to see the new Audit template when the draft CoMCOP is approved.	Thank you for your comments. Wilcock in their role as the Metering Scheme Auditor have completed a Service Provider impact assessment to update the audit once R0152 is approved.
IMServ (Metering Equipment Manager)	n/a	n/a

Question 2:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes.	Thank you for your comments.
EDF (Energy Supplier)	Yes – subject to our comments on the legal text being addressed.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	The problem statement refers to MEMs struggling to successfully pass their CoMCoP audit which, as a DNO, we cannot comment on. However, we agree that the CoMCoP does have some inconsistencies in it and a review of the whole code of practice is necessary	Thank you for your comments.
E.ON Next (Energy Supplier)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	Yes we believe that the proposed solution addresses the problem statement.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	It is concerning to hear that some MEMs have expressed difficulty in adhering to the CoMCoP and have encountered challenges in passing their CoMCoP audits. We broadly support the amendments to the CoMCoP set out in this proposal. We trust that the resulting clarity from these amendments will support MEMs in adhering to their responsibilities under the CoMCoP and evidencing that adherence.	Thank you for your comments.

SSE Energy Supply (Energy Supplier)	Whilst SSE welcome the review of the COMCoP document, we cannot say whether these changes will provide MEMs with the confidence that they are COMCoP compliant.	Thank you for your comments.
BUUK (Distribution Network Operator)	n/a	n/a
Scottish Power Energy Networks (Distribution Network Operator)	The proposed solution addresses the problem statement.	Thank you for your comments.
ENGIE (Energy Supplier)	Yes.	Thank you for your comments.
Siemens (Metering Equipment Manager)	Agree	Thank you for your comments.
Stark (Meter Asset Provider)	We understand that for ASP, the CoMCoP is a voluntary code of practice that relevant ASP's can elect to comply with. It's purpose if to inform on best practise and establish minimum standards for ASP's.	Thank you for your comments. This understanding is correct.
Stark Connect (Metering Equipment Manager)	The proposed solution does clear the duplication sections and make it clearer on the obligations of the relevant parties.	Thank you for your comments.
IMServ (Metering Equipment Manager)	n/a	n/a

Question 3:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes.	Thank you for your comments, most have been actioned. References to Customer have been left in, as this has a separate definition in Schedule 1 to Consumer which is relevant to CoMCoP – "means, for the purposes of the CoMCoP, the party paying for the equipment and service. (This may for example be by the Consumer, Shipper, Gas Transporter, DNO, energy broker, energy management company or Supplier)." EMO and SIP have been left in clause 10.4.3 as the clause is general to electricity and gas meters, it is only the specific example in the brackets which is gas only. EMOs and SIPs still have the general obligation to store, handle and transport meters in their original packaging materials wherever possible. SIP has not been included in the Auditable Party column, as SIPs must be MOAs and

		are audited as a MOA. There is currently no separate SIP audit. Clause 16.8.2 is applicable to gas and electricity, as DNOs, EMOs and SIPs have an obligation to report an unsafe or dangerous installation they become aware of to a Responsible Person. Clauses 20.6.2 to 21.1.2 correctly have no Auditable Party as they are actions for the Code Manager/PAB to take or have no auditable actions for Parties to take. The same applies to those clauses in section 23, they are actions for the Code Manager, PAB or Smart Meter Installation Auditor. Clause 21.3.1, 22.2.1 and 22.2.2 correctly says MEM, as it is applicable to both MAMs and MOAs who are collectively called MEMs. The Code Manager has already made any flow charts/diagrams as clear as possible, but several remain blurry as we do not have any clearer copies of them.
EDF (Energy Supplier)	We have provided some detailed feedback on the proposed legal text in a separate attachment – the following is an overview of our comments. 1. Document Structure and Presentation - EDF agrees with the insertion of the legal clause.	Thank you for your comments, many of which have been actioned. All Party acronyms are expanded in the Scope section of CoMCoP.

	- We found it challenging to track roles due to new acronyms, so we created a PowerPoint block diagram to clarify roles. The REC Code Manager should consider inserting this diagram at the beginning of the document for clarity. 2. Format Consistency and Cross-References - Ensure all text in blue is consistently formatted (hyperlinked or track-changed). - References should consistently list “electricity” before “gas,” as most properties have electricity meters but not all have gas. - Cross-references within the document should be thoroughly checked, we found some errors. 3. Specific Observations and Recommendations (notable areas include): - Appendix 15: Minor typographical adjustments for clarity. - Appendix 4: Process map guidance updates for consistency with meter types. - Section Observations: Numerous section adjustments for language consistency, error corrections, or formatting changes in Sections 3.1.3, 5.4, 11.2.9, 16.8.11, 17.1.2, 20.5.7, 20.5.9, and others. - Appendix 21 has been removed and is regarding the structure of the survey results when sending them back to the REC. Is this because it has been moved to elsewhere? If so, where? 4. Supplementary Guidance Document	Hyperlinks within CoMCoP will be reviewed as part of release activity. The Code Manager has taken the decision not to sort clauses within sections by electricity and then gas, as we do not believe this would add value for the amount of effort it would take. Appendix 21 has become clause 23.9.8 and the note underneath it. Meter Asset Provider (MAP) has not been added to the glossary within CoMCoP as it is defined within Schedule 1 Interpretations and Definitions.

	- We noted two observations on pgs. 4 and 11, suggesting no additional RFI for EMO/MOP competency forms and minor formatting corrections, respectively. 5. Acronym Glossary - Adding MAP to the Glossary table would help. Additionally, adding AKA categories (e.g., Electrical or Gas Meter Installer) would improve clarity.	
Northern Powergrid (Distribution Network Operator)	Yes. See comments and suggestions on the attached draft CoMCoP.	Thank you for your comments, many of which have been actioned. Any references to the DNO passing information or contacts to the MOA have been left as MOA only, as it is then the MOA's responsibility to ensure the EMO as all the information they need. The Code Manager has not included DSR as an acronym for Distribution Safety Rules as it is already used for Demand Side Response under DCUSA and we do not want to create confusion. Clauses 6.1.2 and 6.1.3 do not have SIP included as the Code Manager and SMEs are not aware of any instances where SIPs would be working on DNO equipment, but we can revisit if you have any examples of this.

		Clauses 11.4.22,16.5.2 and 17.5.5a do not include EMO as the actions in these should occur before the site visit. The Code Manager has not removed the timescale from clause 16.2.7 as this is a current obligation and it is not within the scope of R0152 to change obligations. The Code Manager has made the decision to keep the new proposed definition for Meter Operative as is to include any and all agents that may be at site, as it keeps consistency throughout CoMCoP and the definition makes it clear this could include DNOs or ASPs.
E.ON Next (Energy Supplier)	My comments are as follows: • (a) (i) For electricity works, the provisions of the Electricity Act apply, particularly the relevant parts of Schedule 7; • 62,63,64 These are duplicates from 54,55,56 on my document • 3.1.3 Isn't this a statement and shouldn't have any auditable parties?? • Row 132 and row 107 - This is a duplicate with row 107 on company pre-requisites o Relevant Parties of this CoMCoP must be able to demonstrate that works covered by this CoMCoP (including Ancillary equipment) are completed in compliance with industry safety and technical standards	Thank you for your comments, many of which have been actioned. Some of these appear as duplicates in the spreadsheet as they show the new location of the clauses and where they were originally placed, but they do only appear once in the word documents.

	and equipment meets the requirements of the environment in which it is installed e.g. hazardous areas and zoning. A list of standards and procedures can be found in the Appendices. A participating signatory Relevant Parties must ensure that all work under its control is undertaken by Competent Persons as determined by an independently accredited training programme, having the appropriate training, assessment and certification. • 11.1.3 Do we need to state the highlighted bit as we haven't detailed the Unsafe sits for Electric. Surely industry standards would suffice? ○ Industry Unsafe Situations Procedure/IGEM/G/11. • 16.3.12 The MAM wouldn't liaise with the DNO?? Do we mean EMO?? • The last one is section 14 and from 14.8.1 to 14.8.13 would a MOA be the auditable party if the MOA had no techs, and they used an EMO?	
National Grid Electricity Distribution (Distribution Network Operator)	We have noted the following: Scope and responsibilities • 2.3a – Amend "Micro Business Consumers" to "Non-Domestic Consumers" Company Pre-requisites • 5.1.1.aii – Delete duplicate "flow"	Thank you for your comments, many of which have been actioned. The Code Manager has left the reference to Micro Business Consumers in clauses 2.3a, 15.11.2 and 15.14.2k as these are only obligations for Micro Business Consumers in licence conditions.

	• 5.2.4 – amend “MEtering” to “Metering” Consumer Engagement • 15.8.4 - Amend “Micro Business Consumers” to “Non-Domestic Consumers” • 15.10.1 – “Use of the Smart Metering System is must…” Delete “must” • 15.11.2 - Amend “Micro Business Consumers” to “Non-Domestic Consumers” • 15.11.3 – “The Consumer must also directed be to additional…” amend sentence to “The Consumer must also be directed ~~be~~ to additional….” • 15.14.2k - Amend “Micro Business Consumers” to “Non-Domestic Consumers”	
Scottish Power Energy Retail (Energy Supplier)	**The Code Manager is unable to copy and paste the table provided by Scottish Power without corrupting this document, but has summarised the suggested changes below.** • 1.2(d) - The pertinent sections ~~must~~ also ~~be applied for~~ apply to subsequent Smart Metering System installations. • 5.3.1(i) – change Compliance to compliance • 7.1.5 – change Energy Supplier Standard Licence Conditions to Energy Supply Licence • 7.2.4 – remove This includes the Smart Meter Installation Survey, to ensure their responses are captured.	Thank you for your comments, many of which have been actioned. The Code Manager has left the text as Standard Licence Conditions as our legal team have confirmed this is the correct reference. We have also left the Relevant UK Government Department capitalised as we have added this term to the CoMCoP glossary.

	• 8.5.2 – change Codes of Practice to codes of practice • Note 8.6.5 – changes SLCs to Energy Supply Licence • 8.7.4 – change 15.10.1 to 8.9.1 • 8.8.2(b) - it must be made clear • 9.1.2 – change Standard Licence Conditions to Energy Supply Licence • 10.3.1 – change Relevant UK to relevant UK • 11.4.5 – remove a meter and/or a other Metering Equipment component • 13.4.7 – The exchange and validation of information between the relevant Parties ~~is~~ are essential to the success of the planning process • 13.4.14 – change code of practice to CoMCoP • 13.4.15 – change Supplier to Energy Supplier • 16.1.1 – change Schedule 8 to the Unbilled Energy Code of Practice Schedule • 16.1.1 note – change Signatories to Parties • 16.1.2 – change Relevant UK to relevant UK • 16.1.3 – to enter a Site for performing work to promote or sell products • 16.2.8 – change code of practice to CoMCoP • 16.6.4 – change Relevant UK to relevant UK	

	• 17.7.5(b) - an Official Meter Accuracy Tests; • 20.1.2 – change the UK to Great Britian • 20.2.3 – change Relevant UK to relevant UK • 21.2.1 – add apostrophe to MAMs • 23.4.3 – Where instances of non-compliances ~~s~~ have been identified • 23.7.8(b) – add s to Consumer	
SSE Energy Supply (Energy Supplier)	<u>COMCoP Supplementary Guidance</u> • Page 4 – *A copy of this certificate shall be held by the Competent Person named above. All Competent Persons shall observe the relevant provisions of this Consolidated Metering ~~Operation~~ Code of Practice.* • Page 5 - (d) *accurate and, ~~where necessary~~, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate,* • (e) *kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed* • Page 11 - *Example of a Customer's electrical equipment checklist* – This entire section is repetitive, if it expected that the first section is to be left with the consumer then the additional information contained within the *Description of what the question means* can be included within the first section.	Thank you for your comments, many of which have been actioned. The Code Manager has left the obligation in clause 3.1.8 in as short codes are held by Xoserve and Parties should inform the Code Manager when these are changing. We have not added a reference to Crowded Meter Room issues to aborted visits as the Code manager has made the decision not to list any reasons for potential aborted visits as it would be too lengthy.

	Draft COMCoP • Clause 2.3 – We believe this clause should either be moved to before 'Gas Responsibilities' or after 'Electricity Responsibilities'. We believe, in our view, it would 'read' better to have the individual fuels, then the inclusive fuels • Clause 2.5 – We believe this clause should be restructured to – In the tables used in this CoMCoP; o (a) the columns headed 'Involvement' indicate that the listed categories of Party are involved in the activity, but not necessarily responsible for compliance. o (b) the columns headed 'Auditable Party' indicate that the listed categories of Party are responsible for ensuring compliance. o (c) the columns headed 'Work Category' cross refer to the work categories described in Appendix 1. • Clause 3.1.3 - *The following types of documentation are appropriate to demonstrate compliance that Metering Equipment is suitable for the intended use in line with regulations and standards at the time of installation* • Clause 3.1.6 - *The relevant Parties shall provide an appropriate ~~relevant~~ contact email address to the Code Manager and shall notify the Code Manager within 10 Working Days if this information ~~is amended~~ changes* • Clause 3.1.8 - *The MAM shall confirm to the Code Manager the method of communication it uses to send data required by the RGMA baseline. MAMs shall also provide their Market*	

	Participant Short code. This data will be hosted on a secure section of the REC Portal and will be verified as a part of the MAM's audits. The MAM shall notify REC within 10 Working Days if this information ~~is amended~~ changes. ○ Although we have suggested an amendment to this clause, we believe it needs to be explicit that the MAM will only update the Code Manager if their method of communication changes, at present, the clause is written in such a way that it appears the MAM must updated the Code Manager for each part of this clause although the Code Manager should be aware of when a Short Code is changing, prior to the event? • Clause 5.1.1 - *Relevant Parties must meet the requirements of applicable legislation and shall comply with such standards and codes of practice. There are several general health and safety requirements that apply to the works related to this CoMCoP, in particular:* • Clause 5.4.1 - *The DNO has a duty of care to those not under the direct employment of the DNO* • Clause 7.1.4 - *(e) where an installation appointment has been agreed with the Consumer and the date and time band is also confirmed, ~~with~~ the Consumer, is advised by any appropriate media prior to the Installation Visit* • Clause 7.1.4 - *(g) where possible, the Consumer is notified in advance as to how many personnel will attend the Installation*	

	Visit, and if a third-party organisation is being used, ~~and~~ the name of ~~the~~ such organisation; • Clause 8.12.1 - *(l) for a Domestic Consumer that wants to know more about an Energy Supplier's propositions* • Clause 8.13.2 - *(j) for a Domestic Consumer that wants to know more about an Energy Supplier's propositions* • Clause 11.4.5 - *Where the MAM or AMI proposes to remove a meter and/or ~~a~~ other Metering Equipment components* • Clause 23.5.2 - *Upon receipt of the notification of an Energy Supplier's corrective actions* We have noted there are still some elements to the COP which are repetitive and could be combined to make the COP more succinct e.g. the vulnerability sections, marketing at site visits.	
BUUK (Distribution Network Operator)	n/a	n/a
Scottish Power Energy Networks (Distribution Network Operator)	None.	n/a
ENGIE (Energy Supplier)	No.	n/a
Siemens (Metering Equipment Manager)	We have comments on a couple of individual CoMCoP requirements, listed in question 10.	n/a
Stark (Meter Asset Provider)	They all seem fair reasonable.	Thank you for your comments.

Stark Connect (Metering Equipment Manager)	No.	Thank you for your comments.
IMServ (Metering Equipment Manager)	All clause numbers are taken from the excel sheet, not the word document. • 1.1cvi - Add abbreviation of ES to reflect phrasing in all other rows. • 2.5b - Why use the word "Auditable" to denote Responsible Party - why not simply state Responsible Party as the main purpose of this document is to clearly identify responsibilities. The word "auditable" limits any change in audit style or scope. • 5.1.1d - this does not apply to C1 as the MOP does not exceed 0.5 bar • 6.1.5 new clause - It seems odd to place this obligation only on the supplier when a comparable requirement, described in row 95 is applicable to all. Also in many instances the Supplier is not in a position to ensure Third Parties complete this action. • 20.5.6 - Should this be amalgamted into 20.5.5 by stating Where the Engineer or Manager does not hold the relevant appropriate registration a Supporting Person/Consultant will be utilised with the relevant operational experience with a base line competency as above and there should be evidence that the Engineer or Manager is seeking to progress to the required level. reason for this is if 20.5.5 remained there would be no requirement for 20.5.6 as a supporting person is not required	Thank you for your comments, many of which have been actioned. The Code Manager has decided to leave the word Auditable in that column, as it does not denote any audit style, scope or timescale. This column should help Parties know what to expect in their audits. Clause 6.1.5 came from SMICoP and we have tried to keep SMICoP clauses auditable to Energy Suppliers only so we're not adding new obligations to other Parties. The Code Manager has left clauses 15.3.3 and 10.1.2 separate as 10.1.2 is for booking appointments and 15.3.3 is for on site activities. For clauses 7.2.4 and 7.3.1, the Code Manager is assuming the reference to SMETS gas meters is regarding the communications. The obligations in these clauses are only regarding the meter only, not the communications. For clauses 15.11.1 and 15.12.1, AMI and EMO have been added as they will be on site completing the works and so need to be

	• 6.3.4 - AMI and MAM operatives would need to have industry competencies ACS to work in this area and therefore this should be the required check for technical competency • 13.1.6 (row 137) – duplication of row 111 • 15.2.3 - Duplicate - This is covered by new clause row 64. • 15.3.3 - This is the same as row 7 clause 10.1.2 - does it need repeating? • 15.11.1 - This now includes AMI and EMO which means it falls into our remit. but auditable party is the energy supplier. Suppliers would therefore need to agree a method of giving this information. • 15.12.1 - As previous comment • 7.2.4 - Not sure how this can be done for SMETS gas meters? • 7.3.1 - Not sure how this can be done for SMETS gas meters? • 12.3.5 - What work catergory - this should only apply to cat 3 & 4 as no bypass requirement for C1 and C2. • 22.3.4bxi - no bypass on C1 & 2 work • 22.3.4bxii - no bypass on C1 & 2 as installed as per BS6400 part 1 or 2 • 21.1.4ci, civ, v, cviii, cx, cxiv and 22.3.4cii, ciii, dii – not for C1 & 2 • 21.1.4cix – not for SMETS	aware of the obligations, but only the Energy Supplier is auditable. The Code Manager assumes clauses like these would be covered in the contracts between Parties.

	• 8.3.1 - Add AMI? Believe this can only be MAM as GT process would not provide to AMI. Add statement AMI should only work under the relevant GT authorisations/approvals for which the relevant MAM have obtained. Referred to in 8.3.4 duplication • 16.5.2a - Incorrect work type - reference states in clause Cat 4 installations • 8.4.4 and 8.4.5 - All C1 and C2 work types would adhere to BS6400 part 1 02 2 and therefore not able to conduct any work upstream of the ECV and this is Networks requirements • 9.1.3c and d - Not required for cat C1 & 2 • 16.2.1 - Not relevant to Cat 1 & 2 as these installations are fitted in accordance with BS6400 part 1 and 2 no bypasses will be fitted • 14.8.5e - Work cat C1 & C2 does not apply as installed as per BS6400 part 1 and 2 • 21.3 notice and labels new clause - No statutory labels, only advisory labels in Electric. Suggest rewording.	

Question 4:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	NA	n/a
EDF (Energy Supplier)	N/A – The changes will not have an impact on the work that we complete and therefore would not require any time for implementation.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No lead time required as there are no additional obligations.	Thank you for your comments.
E.ON Next (Energy Supplier)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	Lead time would be minimal	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	At this stage, we believe that Parties should have a minimum of 3 months of implementation time from a positive decision on this proposal. While we are broadly supportive of the proposal, and we recognise the potential benefits of the revision of the CoMCoP, it is important that Parties have time to make any necessary system and process changes and to discuss any resulting change with other stakeholders, both of which will support the effective implementation of a revision to the CoMCoP.	Thank you for your comments.

SSE Energy Supply (Energy Supplier)	We do not believe a lead time required.	Thank you for your comments.
BUUK (Distribution Network Operator)	n/a	n/a
Scottish Power Energy Networks (Distribution Network Operator)	We do not expect a lead time for this change and will implement in line with the appropriate date.	Thank you for your comments.
ENGIE (Energy Supplier)	3 months would be sufficient.	Thank you for your comments.
Siemens (Metering Equipment Manager)	We don't think that we will need to make any changes to meet the new/altered requirements.	Thank you for your comments.
Stark (Meter Asset Provider)	We are taking business as usual approach as long as we are aware of the proposed solution.	Thank you for your comments.
Stark Connect (Metering Equipment Manager)	We are taking business as usual approach as long as we are aware of the proposed solution once it's approved.	Thank you for your comments.
IMServ (Metering Equipment Manager)	n/a	n/a

Question 5:	Would implementing the proposed solution incur any costs to your business? If so, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	No.	Thank you for your comments.
EDF (Energy Supplier)	No.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No.	Thank you for your comments.
E.ON Next (Energy Supplier)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	Costs would be limited to documentation and policy updates	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We have not identified financial implications of this proposal at this stage.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We do not foresee any additional costs.	Thank you for your comments.
BUUK (Distribution Network Operator)	n/a	n/a
Scottish Power Energy Networks (Distribution Network Operator)	We do not anticipate any costs as a result of this change.	Thank you for your comments.

ENGIE (Energy Supplier)	No, as we have been assured that there are no additional obligations arising from the changes.	Thank you for your comments.
Siemens (Metering Equipment Manager)	We don't think that we will need to make any changes to meet the new/altered requirements.	Thank you for your comments.
Stark (Meter Asset Provider)	No.	Thank you for your comments.
Stark Connect (Metering Equipment Manager)	No.	Thank you for your comments.
IMServ (Metering Equipment Manager)	n/a	n/a

Question 6:	Taking into consideration both the costs and the benefits seen by your organisation, do you consider this change should be made?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes.	Thank you for your comments.
EDF (Energy Supplier)	Yes – it is clear that the current version of the CoMCoP is not correct and therefore needs to be amended to accurately reflect the obligations of the parties it relates to.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes. The current CoMCoP have inconsistencies and is very difficult to navigate around. The re-order of the clauses to follow the chronology of an installation, together with an Excel version to filter out obligations, will make it a much more user friendly document.	Thank you for your comments.
E.ON Next (Energy Supplier)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	We believe that in order to achieve clarity and remove ambiguity within the CoMCoP, these changes have been thoroughly discussed with industry parties and the change should be made	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	On balance, we believe that this proposal should be taken forward at this stage.	Thank you for your comments.

SSE Energy Supply (Energy Supplier)	This change makes clarifications to the CoMCoP, therefore SSE are happy for this change to be implemented.	Thank you for your comments.
BUUK (Distribution Network Operator)	n/a	n/a
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we are supportive of this.	Thank you for your comments.
ENGIE (Energy Supplier)	Yes, it is a sensible rationalisation.	Thank you for your comments.
Siemens (Metering Equipment Manager)	Yes, we believe that the change is beneficial as it provides requirement clarity.	Thank you for your comments.
Stark (Meter Asset Provider)	Yes – we believe updating the term of references, reorganising the sectors by removing and adding new clauses would reduce duplications and confusion for both audit party and Auditors.	Thank you for your comments.
Stark Connect (Metering Equipment Manager)	Yes, we believe updating the term of references, reorganising the sectors by removing and adding new clauses would reduce duplications and confusion for both audit party and Auditors.	Thank you for your comments.
IMServ (Metering Equipment Manager)	n/a	n/a

Question 7:	Do you believe the Smart Metering Installation Audit clauses in the Audit and Survey section (section 23 in the new draft) should remain within CoMCoP, or move to a different schedule (such as Schedule 15 Metering Accreditation)?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	NA	n/a
EDF (Energy Supplier)	In our view these clauses should remain within the CoMCoP – as it is referring to multiple points of CoMCoP and is around the auditing of the work completed in line with the CoMCoP obligations we believe it makes sense for it to remain in here.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	We consider the audit section of CoMCoP should not be within CoMCoP. It would be more appropriate for it to be part of its own stand-alone document – accessed through Schedule 15. Schedule 15 is about metering accreditation and already includes a section on auditing. The audit section was not part of MOCOPA before it was consolidated into the CoMCoP. It was in a separate registration authority document.	Thank you for your comments. The Code Manager has elected to leave this section within CoMCoP as the majority of Energy Suppliers who have responded to this Party impact assessment have indicated this as their preference, and this section affects them the most.
E.ON Next (Energy Supplier)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	We would suggest that wherever the Smart Metering Installation Audit clauses remain, their location should be referenced and signposted within the other document.	Thank you for your comments.

Scottish Power Energy Retail (Energy Supplier)	We have no objection to the Smart Meter Installation Audit sections being situated in the CoMCoP.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	For the sake of consistency we feel the Smart Metering Installation Audit clauses should remain within CoMCoP. Although Metering Accreditation is not the best place for Smart Metering Installation Audit clauses we would be happy to look at any other proposals.	Thank you for your comments.
BUUK (Distribution Network Operator)	n/a	n/a
Scottish Power Energy Networks (Distribution Network Operator)	N/A this does not relate to DNO.	n/a
ENGIE (Energy Supplier)	We believe they should remain in the COMCOP as Schedule 15 is specifically aimed at accreditation of MEMs, Approved Meter Installers and AMR Service Providers, whereas some of the audit and survey obligations in COMCOP fall on Suppliers.	Thank you for your comments.
Siemens (Metering Equipment Manager)	No opinion.	n/a
Stark (Meter Asset Provider)	n/a	n/a
Stark Connect (Metering Equipment Manager)	We believe the Smart Metering installing audit clauses in the Audit and Survey section does fit for purpose and fine to remain within CoMCoP. It does not impact on us (as SCL MEM) as we don't deal with domestic sites.	Thank you for your comments.
IMServ (Metering Equipment Manager)	n/a	n/a

Question 8:	Do you find the excel version of CoMCoP easy to filter/navigate? Do you see benefit in an excel version being available on the REC Portal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	We believe this is down to preference on both would be that benefit to the industry.	Thank you for your comments.
EDF (Energy Supplier)	Yes – The Excel version is a good addition and makes it easier to jump straight to an area (rather than having to scroll)	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes. Being able to filter out Party involvement and audit responsibility will be very useful.	Thank you for your comments.
E.ON Next (Energy Supplier)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we found the excel version easy to navigate and filter. We do believe that there would be benefit in an excel version being available on the REC Portal.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We welcome Code documents being made available in different file types to support readability and accessibility. We would certainly have no objection to the CoMCoP being available as an Excel file.	Thank you for your comments.

SSE Energy Supply (Energy Supplier)	We have found the Excel version CoMCoP easier to navigate to the clauses that impact our business and find redlined changes. SSE would be happy for this version to be added to the REC portal.	Thank you for your comments.
BUUK (Distribution Network Operator)	n/a	n/a
Scottish Power Energy Networks (Distribution Network Operator)	The excel version of CoMCoP is easy to filter & navigate and ought to be available on the REC Portal	Thank you for your comments.
ENGIE (Energy Supplier)	Yes. This is an extremely useful document and we would welcome having an up to date version on the REC Portal.	Thank you for your comments.
Siemens (Metering Equipment Manager)	Yes, please retain the excel version.	Thank you for your comments.
Stark (Meter Asset Provider)	It's beneficial (especially for multi roles organisation) to filter/navigate the party for different obligations, relevant CoMCoP sectors and Audit changes via excel with bullet point description. There is one thing we would like to clarify in the excel version of CoMCoP – Post installation tab Section 21 Industry Notification, Column G row 261 Gas involvement shows AMI, ASP, MAM but column K Auditable Party is empty. Should ASP in the Audible party column?	Thank you for your comments.
Stark Connect (Metering Equipment Manager)	It's beneficial (especially for multi roles organisation) to filter/navigate the party for different obligations, relevant CoMCoP sectors and Audit changes via excel with bullet point description. We believe Excel and Word has benefit in its own way.	Thank you for your comments.

IMServ (Metering Equipment Manager)	We have found this Workbook incredibly useful, to the extent that this would be the document that the Field managers refer to, rather than the Word version of CoMCoP.	Thank you for your comments.

Question 9:	For the new clauses added, do you agree these do not confer new obligations on the Parties listed? If you believe they should not be added, please confirm why (including if they are duplicates of obligations under other codes/governance).	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	n/a	n/a
EDF (Energy Supplier)	Yes – we agree that the new clauses do not confer new obligations.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.
E.ON Next (Energy Supplier)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	We are currently reviewing the new clauses that have been added with our legal teams so are unable to comment.	n/a
Scottish Power Energy Retail (Energy Supplier)	In our view, the significant majority of the amendments to the CoMCoP set out in this proposal do not create new obligations for Parties. However, we consider that some amendments may create such new obligations. At this stage, we are continuing our assessment of their potential impact.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE only reviewed the supplier related clauses, but the new clauses appear to be simplifications of earlier clauses, so therefore we do not believe there are new obligations, which need to be considered.	Thank you for your comments.

BUUK (Distribution Network Operator)	n/a	n/a
Scottish Power Energy Networks (Distribution Network Operator)	The new clauses added do not confer new obligations on the Parties listed.	Thank you for your comments.
ENGIE (Energy Supplier)	Our only comment here is on 20.1.1 to 20.9.17 in the Audit and Survey Section where ES has been entered against Smart obligations where previously it was absent. We've discussed this with REC and been advised that this refers to REC's existing ability to conduct ad hoc audits on Suppliers, a power that has seldom been exercised to date. It could be useful to have a separate clarification from REC as to Energy Suppliers' audit obligations and how these interact with those of Third Party MEMs, Meter Installers etc – what is covered by the initial mandatory audit when Suppliers have just started installing Smart meters, and what is the nature of the ongoing requirement.	Thank you for your comments.
Siemens (Metering Equipment Manager)	We don't think that we will need to make any changes to meet the new/altered requirements.	Thank you for your comments.
Stark (Meter Asset Provider)	n/a	n/a
Stark Connect (Metering Equipment Manager)	SCL believes the new clauses added are feasible and do not confer new obligations on the parties listed. "Relevant Parties shall ensure that statutory and advisory labels are fitted as required, including any arising from the conditions imposed through the approval or authorisation by third parties".	Thank you for your comments.
IMServ (Metering Equipment Manager)	n/a	n/a

Question 10:	Do you have any other comments on this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Please see second attachment.	Thank you for your comments.
EDF (Energy Supplier)	No.	n/a
Northern Powergrid (Distribution Network Operator)	Yes. As there will likely be many more amendments and changes to the draft document following this impact assessment, we would like the opportunity to review again prior to it going live. We assume that this will be accommodated during the consultation stage?	Thank you for your comments. There will be a consultation stage in this Change Proposal, which will run for an extended period similar to impact assessment.
E.ON Next (Energy Supplier)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	None.	n/a
Scottish Power Energy Retail (Energy Supplier)	We have no further comments to make on this proposal at this stage.	n/a
SSE Energy Supply (Energy Supplier)	No.	n/a
BUUK (Distribution Network Operator)	n/a	n/a

Scottish Power Energy Networks (Distribution Network Operator)	No further comments	n/a
ENGIE (Energy Supplier)	No.	n/a
Siemens (Metering Equipment Manager)	We have comments on a couple of individual CoMCoP requirements: Section 6 Qualifications and Training – The requirements state that the review of Competency for gas must be completed by someone with Eng Tech certification. What level of training is required for Electricity? Appendix 9 – The first sentence of Appendix 9 states that "There is no accepted definition of a competent person". Appendix 9 goes on to state that you can have either training or experience. We feel that this is contradicted by much of section 6.2, particularly requirement 6.2.1, which requires training and certification. As a result, we are unclear what level of experience would be acceptable to an auditor and how we could evidence this.	Thank you for your comments. There is no specific level of training required for electricity, and that will not be introduced under R0152 as that would be a new obligation. The first sentence of appendix 9 has been amended to state "There is no single accepted definition of a competent person" and the Code Manager hopes this removes confusion. The rest of appendix 9 goes on to reference many levels of experience that may be suitable, dependent on the job being done by the operative.
Stark (Meter Asset Provider)	As mentioned, we would like to see the new Audit question template when the drafted CoMCoP has been approved to ensure that they are in alignment.	Thank you for your comments.
Anonymous (Metering Equipment Manager)	Initially we have concern it might give advantage for new entrants or previous failed Audit Elec MEM party an easy way to get out their Audit. However after further discussion with REC code representatives we understand it shouldn't be the case.	Thank you for your comments.

IMServ (Metering Equipment Manager)	n/a	n/a