RETAIL ENERGY CODE

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

INITIAL ASSESSMENT REPORT

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

DOCUMENT VERSION	V1.0
DATE ISSUED	19/12/2023
DOCUMENT APPROVAL STATUS	APPROVED

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

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.

	High Impact: N/A
	Medium Impact: Suppliers, MEMs, DNOs, Metering Scheme Auditor
	Low Impact: N/A

1 BACKGROUND

On 01 April 2023 the new CoMCoP went live following the release of R0047 Metering Code of Practice Consolidation Review and R0084 Housekeeping changes to the approved legal text for R0047. The CoMCoP is a consolidation of four gas and electricity codes that set out activities for the installation and maintenance of meters, providing the minimum standard that must be complied with to perform this work.

Since its implementation, a number of issues have been identified with the CoMCoP. These have been raised by REC Parties where they are unable to meet their obligations as currently presented in the CoMCoP. Some additional analysis has been completed by RECCo and submitted with this Change Proposal (REC Analysis CoMCoP document). This identified several changes that need to be made to the CoMCoP and potentially supporting accession documents. It is recognised that the analysis is not exhaustive, and that a more complete review is required by the Code Manager to determine what additional changes are needed.

There is a growing concern among REC Parties, particularly Metering Equipment Managers (MEMs), that they are contracting with Suppliers on the assumption they are compliant with the CoMCoP, which may not be possible in its current iteration. This Change Proposal has been raised to ensure accurate text is held in the REC, addressing any omissions, clarifications, errors, duplication, and inconsistencies identified. This final legal text should enable REC Parties to be compliant and to allow the Metering Scheme Auditor to ensure audits are accurate and reflect practices in the field.

A derogation request has been submitted to the Performance Assurance Board (PAB) in relation to Parties' compliance with the CoMCoP while this change is on-going. The Code Manager has committed to providing the PAB with regular updates as the change progresses.

2 PROBLEM STATEMENT

MEMs are struggling to successfully pass their CoMCoP audits and be compliant, due to inconsistencies and lack of clarity in the document. There has been concern expressed by MEMs, that when contracting with Energy Suppliers, they are proclaiming themselves compliant with the CoMCoP when this may or may not be true.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As a Consumer, I trust my Energy Supplier and their associated agents to have a robust metering framework to ensure the safety and accuracy of my meter.
MARKET PARTICIPANT USER STORIES	
M1	As an Energy Supplier, I need clear and correct documentation so I can identify the obligations I need to meet within my role and satisfy my audit criteria.
M2	As an Energy Supplier, I need to know that any MEM or DNO I work with is compliant to ensure the best practice for my customers.
M3	As a MEM, I need clear and correct documentation so I can identify the obligations I need to meet within my role and satisfy my audit criteria.
M4	As a DNO, I need clear and correct documentation so I can identify the obligations I need to meet within my role and satisfy my audit criteria.
M5	As the Metering Scheme Auditor, I need clear and correct documentation to ensure I can fulfil my role and provide confidence that REC Parties are meeting their obligations.

4 IMPACTS

REC SERVICE PROVIDERS
Metering Scheme Auditor (Wilcock)

RECCO / REC CODE MANAGER
Subject Matter Expert (SME) requirement to develop the change

REC PARTIES AND SERVICE USERS
MEMs
Energy Suppliers
DNOs

REC DOCUMENTS / PRODUCTS
Consolidated Metering Code of Practice
Market Entry and Accession forms

Following the legal text changes being made to the CoMCoP, there will need to be a review of the relevant REC Schedules to ensure that any references to specific CoMCoP clauses are correct.

5 CROSS-CODE IMPACTS

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

6 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	SELF-GOVERNANCE	RESPONSIBLE COMMITTEE	CHANGE PANEL

Although the Metering Expert Panel is the responsible committee for the CoMCoP, the Code Manager has determined this change will progress via the Change Panel as the accession documents, business solution documents and other REC Schedules will all also likely be impacted under this change. However, the Code Manager will keep the Metering Expert Panel updated throughout the change process. This change will follow a self-governance change path.

7 PRIORITY STATUS AND URGENCY

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	0	27	0
	Retail Markets Impact	Retail Risk(s)	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		2	9	18
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		2	17	17
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	2	10	20
				Overall Priority Score (rounded)	113

Priority Status	MEDIUM
Change Proposal Type	STANDARD

This Change Proposal has a medium priority based on an urgency score of 2 and a priority status of 113. This can be broken down as follows:

- Retail Markets Impact – a score of 1 as there is a minor impact on Retail Risk 13. By improving clarity of obligations on MEMs, this will lead to a better Consumer experience for metering works conducted.
- REC Operational Efficiencies, and Legal and Regulatory Compliance – a score of 2 each as there is moderate improvement from updating the affected documents. There are also potential consequential impacts to the Metering Scheme Auditors to make sure their documents are in line with the new version of the CoMCoP.
- Resource – a score of 2 to reflect that this change requires further analysis and SME engagement before progressing to solution development and impact assessments.
- Strategic Alignment to REC objectives and forward work plan – a score of 2 and 0 respectively as while this Change Proposal is directly related to the REC mission statement of continuous improvement, it is not affecting the forward work plan.

- Urgency – a score of 2. While this change needs to be progressed by the Code Manager as soon as is reasonable to remove obstacles faced by REC Parties, it is appropriate to ensure adequate time is taken to achieve the right proposed solution.

8 SUMMARY OF CHANGE PROPOSAL PLAN

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

This review will be done by a core working group of SMEs from the Code Manager, RECCo and REC Parties. 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.

At this time, it is not possible for the Code Manager to set the timetable beyond solution development as the scale of the changes required is not completely known.

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

9 GLOSSARY

TERM	DEFINITION
Consolidated Metering Code of Practise (CoMCoP)	means the code of practice against which relevant ASPs, MEMs and MIs are assessed pursuant to the metering Accreditation Schedule.
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.
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Energy Supplier	Means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Subject Matter Expert (SME)	means the individual(s) or organisation(s) contracted by RECCo and selected by the Code Manager for the purposes of analysing Change Proposals.
Metering Scheme Auditor	means a person appointed by the RECCo to audit compliance with the CoMCoP.