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CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0170 - WITHDRAWAL OF SERVICE TERMINATION ISSUE REPORTING GUIDANCE (STIRG) FROM REC GOVERNANCE

On 08 August 2024 the Code Manager issued a consultation to industry to seek feedback on the Change Report for consultation for R0170 Withdrawal of Service Termination Issue Reporting Guidance (STIRG) from REC Governance.

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	Change Panel
LEAD ANALYST	Caroline Freimuller

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RESPONSE DEADLINE	02/09/2024

Question 1:	Do you agree with the Code Manager's assessment of the benefits and drawbacks of the R0170 solution? Do you have any further comments on the solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	We agree with the assessment however we are uncertain the extent to which the potential for this document to ultimately be shifted to the Electricity Technical Code has been considered, which we feel could add value to the modification.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE agree with the Code Manager's assessment of the draw backs of R0170.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes. There are clear and documented benefits for governance of the STIRG to be moved from the REC to the ENA. The significant drawback stated by MEMs and suppliers in the impact assessment responses summary is the loss of their voting rights to changes proposed to the STIRG. Although R0170 requires the MEP to review any proposed changes to the document, it is not necessary for the MEP to approve them. We acknowledge that changes could potentially be made to the STIRG without the consent of the MEMs and suppliers, which is a significant risk to them. Therefore, we consider it appropriate that the MEP should approve any changes proposed to the STIRG before they are binding, provided that the changes we proposed to the MEP's terms of reference in our response to the consultation on C3-0091 are implemented.	Thank you for your comments. The Code Manager is not supportive of this change even with amending the solution to include MEP approval (rather than just review), as it does not solve the risk of the lack of an appeals process or the inability of anyone who is not an ENA member to raise changes.

	By introducing approval by the MEP of any changes to the STIRG, we consider that the other major concerns of MEMs and suppliers stated in the change report will also be alleviated.	
Scottish Power Energy Networks (Distribution Network Operator)	The underlying problem is the enduring governance of the document. The proposed legal alteration is sustainable only until the document is changes to category 2. SPEN reaffirms that governance arrangements outside of REC should be considered and that transferring the document to ENA should provide an acceptable solution for all affected REC Parties.	Thank you for your comments.
E.ON (Metering Equipment Manager)	E.ON acknowledges both the drawbacks and benefits outlined in the Code Manager's assessment; however, from E.ON MEM party perspective, EON's view is that the drawbacks outweigh the benefits. E.ON agrees with the Code managers view to reject this change. We instead support the alternative proposals under C3-0091	Thank you for your comments.
IMServ (Metering Equipment Manager)	No.	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	As a DNO NGED feel that the document is best cited within the ENA suit of guidance documents, as the guidance is relating to access and operation of DNO owned assets.	Thank you for your comments.
Anonymous (Metering Equipment Manager)	Yes.	Thank you for your comments.
Scottish and Southern Electricity Networks (Distribution Network Operator)	SSEN disagrees with the code manager's assessment regarding the R0170 solution. SSEN believes that the that STIRG document must be	Thank you for your comments.

	removed from REC governance as the current governance and voting process is unsuitable. For the same reasoning as was applied within SSEN's response to the R0145 consultation, SSEN believes that the current voting arrangements under REC MEP are unsuitable and therefore are supportive of R0170 which is proposing to withdraw the STIRG from REC Governance. SSEN's view is that the current arrangements under REC offers the Supplier Party Category a vote on a crucial document that only involves Network Parties and MEMs. This has the potential to dictate changes to processes that are working effectively and have the potential to impact the customer journey negatively.	

Question 2:	Do you agree that the proposed solution resolves the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	Problem Statement: The issues surrounding the status of the STIR Guidance document is impacting on the ability of involved parties to review and update the guidance. We would query whether the document needs to be updated at this time and what would the impact be of this not being updated?	Thank you for your comments. The document can be updated now, there have been 2 updates to the STIR document during 2024.
SSE Energy Supply (Energy Supplier)	Whilst the proposed solution resolves the problem statement for some parties, for other parties, it could have unforeseen consequences.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No. The withdrawal of D0170 is dependent on the acceptance of C3-0091 to achieve the original objective of D0170. We have responded to the consultation on C3-0091 and we do not think it achieves the objectives set out.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Only in the interim under current cat 3 status	Thank you for your comments.
E.ON (Metering Equipment Manager)	The section concerning legal text requires clarification. It specifically states that the MEP is only obligated to review changes made to the STIRG document and is not required to approve them. It must be explicitly clear that the STIRG is legally binding under the REC only if these changes have been approved by the MEP relating to REC obligations.	Thank you for your comments. The solution for this change purposefully does not require the MEP approve any changes to the document.
IMServ (Metering Equipment Manager)	Yes keeping the STIRG document with REC Governance.	Thank you for your comments.

National Grid Energy Distribution (Distribution Network Operator)	If the document is moved to the ENA then yes, the solution resolves the problem	Thank you for your comments.
Anonymous (Metering Equipment Manager)	Yes.	Thank you for your comments.
Scottish and Southern Electricity Networks (Distribution Network Operator)	SSEN agree that the solution proposed as part of R0170 mitigates the risk to DNOs posed by the current REC Governance. SSEN believes that moving the STIRG document away from this governance and allowing scrutiny by the REC MEP allows suitable review and protection for all parties, given that the REC MEP forum is the expert panel where metering practices and changes are discussed and voted upon.	Thank you for your comments.

Question 3:	Do you have any comments on the proposed legal text which sets out the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	No comments.	n/a
SSE Energy Supply (Energy Supplier)	Not at this time.	n/a
Northern Powergrid (Distribution Network Operator)	Yes. The draft definition of the STIRG in the "schedule1 – interpretations and definitions" document makes reference to it only being binding if the ENA has provided notice of the changes to the MEP. Taking into consideration the concerns of MEMs and suppliers, the definition of the STIRG should be changed to confirm that changes to the STIRG are only binding if approved by the MEP.	Thank you for your comments. The Code Manager is not supportive of this change even with amending the solution to include MEP approval (rather than just review), as it does not solve the risk of the lack of an appeals process or the inability of anyone who is not an ENA member to raise changes.
Scottish Power Energy Networks (Distribution Network Operator)	The revised legal text suffices as an interim solution only.	Thank you for your comments.
E.ON (Metering Equipment Manager)	E.ON partially agrees with the proposed solutions regarding the MEP's review of the STIRG document and strongly advocates for the MEP to approve the STIRG document as part of its REC obligations.	Thank you for your comments. The Code Manager is not supportive of this change even with amending the solution to include MEP approval (rather than just review), as it does not solve the risk of the lack of an appeals process or the inability of anyone who is not an ENA member to raise changes.

IMServ (Metering Equipment Manager)	No.	n/a
National Grid Energy Distribution (Distribution Network Operator)	No.	n/a
Anonymous (Metering Equipment Manager)	No.	n/a
Scottish and Southern Electricity Networks (Distribution Network Operator)	SSEN is supportive of the draft legal text proposed under R0170, as it gives REC MEP members the opportunity to provide feedback on all proposed changes intended to be made to the STIRG document. DNOs are responsible for ensuring the safety of their equipment and should be free to determine how equipment issues should be reported to them from site. The proposed legal text allows for collaboration with the REC MEP and ensures that no change can be made without prior discussion at this forum. The aim is to continually improve the document to maintain it as a valuable industry resource, prioritising safety for all parties and ensuring a positive customer engagement.	Thank you for your comments.

Question 4:	Do you anticipate any benefits or risks to your organisation, or to the industry, as a result of this change? If so, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	There is a potential benefit in that applying R0170 would facilitate the shift to the new Electricity Technical Code when formed as this may be a more appropriate home for it.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	As outlined, the lack of voting rights for suppliers and MEMs and the ability to raise changes for suppliers and their appointed MEMs provides a risk and potential costs to their business.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes. If D0170 is withdrawn and C3-0091 rejected for the reasons stated in Q2, we are left with a status quo position which, with current MEP voting rights, can allow the STIRG to be amended without DNO consent. This potentially allows MEMs and Suppliers to dictate DNO asset management policy, which is clearly inappropriate and, therefore, unacceptable to the DNOs. Therefore, D0170 should not be withdrawn until the outcome of C3-0091 is considered.	Thank you for your comments. The Code Manager would like to note that even without the changes from C3-0091, any Party who disagrees with a change which has been approved or rejected could escalate this to first the Change Panel and then to the Authority. To date, the Code Manager has not seen any evidence of Suppliers and MEMs attempting to force through changes DNOs disagreed with.
Scottish Power Energy Networks (Distribution Network Operator)	For example, to support the necessary planning and organisation to make good on category B faults, the DNO's must have overall authority for asset intervention and safe network operations. For that reason, SPEN is to re affirm its support for R0170.	Thank you for your comments.
E.ON (Metering Equipment Manager)	E.ON agrees with all the risks outlined in the impact assessment summary, which include: • They highlighted risks associated to the move to ENA governance, the largest of which was the loss of voting rights for MEMs and Energy	Thank you for your comments.

	Suppliers on the STIRG document (which would affect these Parties and could cause adverse effects to their business if changes were made without their consultation). • A risk was highlighted concerning how Parties could incur unforeseen costs for training, tooling, resourcing etc. depending on changes made to STIRG by the ENA. • They also highlighted the lack of ability to raise changes under the ENA, and lack of appeals process for changes they disagreed with. • They feel this change would remove the joint approach to review and voting that occurred while this document was held under MOCoPA and continues under the REC. • A risk was raised by the AMO that the STIRG document could become out of sync between the ENA and REC if it is not reviewed by the MEP, creating extra risk within the industry	
IMServ (Metering Equipment Manager)	Yes as per original consultation response.	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	If the document is a class 2 or 3 item in the REC there is a risk that other parties could impose changes to DNO asset management processes and procedures by the biased voting system.	Thank you for your comments.
Anonymous (Metering Equipment Manager)	The risk is that due to agreement of changes by All; a single party objection would result in rejection of the change and this could be to the detriment of safe procedure or benefit to the customer. REC will review but not mandate on proposed updates; so no appeals process.	Thank you for your comments.
Scottish and Southern Electricity Networks (Distribution Network Operator)	A key benefit of this change for SSEN is the removal of the risk that parties other than the DNO would be able to instigate changes to the STIRG, which would ensure DNO practices and asset management policies can be maintained and not at risk of being undermined.	Thank you for your comments.

	A further benefit of this change would be a more streamlined process under ENA to introduce changes which reflect safety concerns and evolving best practice, alongside ways in which customer service can be improved. SSEN understands that industry parties will work collaboratively, maintaining safety and customer service at the forefront however, under the REC Governance as it stands, SSEN believes there is a real risk that its asset management policies could be undermined if changes were brought by other parties where DNOs could be out-voted.	

Question 5:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the Change Panel? Or is it more appropriate for this to be an Authority determined change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	No – given the diverse views and has implications for consumers it should be an authority approval modification.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE agree with this change proposal being subject to Self-Governance. Should the Code Managers view on a proposal change then we believe the Authority should review it.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes, self-governance approval is more appropriate.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	It is more appropriate for this to be an Authority determined change.	Thank you for your comments.
E.ON (Metering Equipment Manager)	E.ON agrees with the Code Manager's assessment that there is no strong positive case for change and supports the position to reject the proposed change under self-governance. However, if the decision is not to reject this proposal, considering the differing opinions among Parties and the lack of a solution that benefits all Parties equally, it is recommended that the authority make the final decision on the change proposal.	Thank you for your comments.
IMServ (Metering Equipment Manager)	n/a	n/a
National Grid Energy Distribution (Distribution Network Operator)	NGED feel it should be an authority determined change	Thank you for your comments.
Anonymous (Metering Equipment Manager)	Self-governance approval	Thank you for your comments.

Scottish and Southern Electricity Networks (Distribution Network Operator)	SSEN agree that the change path for this change proposal should remain as self-governance, however we retain the right to appeal to the Authority, on the grounds of maintaining safety, customer service and the management and control of our assets.	Thank you for your comments.

Question 6:	Do you agree with the Code Manager's recommendation, that the Change Proposal should be rejected by the Change Panel? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	We can neither agree or disagree as this depends heavily on whether this document should remain with the REC or under the Electricity Technical Code – which is a decision which would require greater scrutiny in the interim (which we do not believe has occurred at this time) plus OFGEM input.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE support the recommendation to reject this proposal.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No, we do not agree to that at this stage. We think the concerns of MEMs and suppliers can be accommodated within this change proposal. As referenced in Q1, we consider that (a) a change to the definition of the STIRG to require MEP approval of any proposed changes and (b) the associated changes to the MEP's terms of reference we proposed in our response to the consultation on C3-0091 will achieve the principal objective of D0170. We consider that it remains appropriate for the STIRG to be housed under ENA governance, with controls in place to facilitate collaboration between DNOs and MEMs to debate and propose changes to the STIRG. We feel this can be achieved through D0170 with the amendments we have proposed.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	No, SPEN are supportive of the progression of R0170 would recommend that C3-0091 is rejected as STIRG's appropriate governance is under the auspices of the ENA.	Thank you for your comments.

E.ON (Metering Equipment Manager)	E.ON concurs with the Code Manager's recommendation to reject the proposal at the change panel. After conducting its own assessment, E.ON shares the view that there is no compelling positive case for the change. Additionally, the differing opinions among parties, with no single solution benefiting all parties equally, further support this position.	Thank you for your comments.
IMServ (Metering Equipment Manager)	Yes.	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	No, for reasons stated in the answer to question 4.	Thank you for your comments.
Anonymous (Metering Equipment Manager)	Yes.	Thank you for your comments.
Scottish and Southern Electricity Networks (Distribution Network Operator)	SSEN does not agree with the Code Manager's recommendation to reject this change proposal. For the reasons stated throughout this consultation response, SSEN believes this change should be progressed, to allow the STIRG to sit under ENA governance.	Thank you for your comments.

Question 7:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	We would reiterate our comments about considering the possibility of whether it should it belong in the Electricity Technical Code instead.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No.	n/a
Northern Powergrid (Distribution Network Operator)	Whether the STIRG is governed under ENA or REC is not our primary concern. Consideration of this and the related change proposals (R0145 and C3-0091) has been ongoing for several months without a conclusion, meaning that some changes to the STIRG that were agreed in principle between DNOs and MEMs in 2023 are currently prevented from being implemented.	Thank you for your comments. The document can be updated now, there have been 2 updates to the STIR document during 2024.
Scottish Power Energy Networks (Distribution Network Operator)	None.	n/a
E.ON (Metering Equipment Manager)	No further comments beyond what has already been mentioned above.	n/a
IMServ (Metering Equipment Manager)	No.	n/a
National Grid Energy Distribution (Distribution Network Operator)	If the document is on the ENA site then any changes and updates would be discussed and actioned through all party meetings. Since the loss of the MOCOPA All Party Working Group it has become more difficult to get changes actioned. There are changes waiting to be implemented and added to the document that have been requested by	Thank you for your comments.

	Supplier parties, and the longer the process is taking the more disruptive this is to getting all parties to work aligned.	
Anonymous (Metering Equipment Manager)	No.	n/a
Scottish and Southern Electricity Networks (Distribution Network Operator)	n/a	n/a