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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0170 – WITHDRAWAL OF SERVICE TERMINATION ISSUE REPORTING GUIDANCE (STIRG) FROM REC GONVERNANCE

On 28 June 2024 the Code Manager issued an impact assessment to industry to seek feedback on 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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LEAD ANALYST	Caroline Freimuller

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Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
EDF (Metering Equipment Manager)	EDF does not agree with the proposed solution. We are very concerned that this change will limit the ability for Electricity MEMs to influence the content of the STIRG. Under REC governance, Electricity MEMs are currently consulted on changes to the STIRG and have voting rights (through the MEP) prior to the introduction of changes or amendments to this document. REC Governance also allows parties a right of appeal if they believe that a decision has not been made on a correct basis. We do not believe that the same will occur under ENA governance. The proposed change removes this control as it only allows the MEP to review changes prior to implementation, it does not give them a right of approval. There is a risk that changes could be made to the STIRG under ENA governance, which could materially impact Electricity MEMs (and the suppliers they work for). DNO's are responsible for knowing what equipment is on site and the condition of it. We are concerned that future changes to the STIRG under ENA governance could place additional responsibilities on Electricity MEMs, which could result in additional time on site and increased costs. This could also result in customer impact as Electricity	Thank you for your comments.

	MEMs costs may increase, which would need to be passed on to suppliers and subsequentially customers.	
Energy Networks Association (Trade Association)	We support the solution as proposed.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We do not have an objection in principle to the removal of the Guidance for Service Termination Issue Reporting (STIRG) from the REC Baseline Statement (and its effective transfer to the Energy Networks Association). However, in such an event, we believe it is crucial to ensure that the REC Metering Expert Panel retains sufficient agency over any future changes to the STIRG. We are not convinced that the current draft legal text provides the necessary conditionality (namely, for Schedule 1), and we have proposed supplementary wording in our response to Question 3.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	We support the solution as proposed.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We agree that the STIRG will sit better under ENA governance, however we would like to ensure that any suggested updates via the REC MEP are relayed to industry for input, the REC MEP should not be able to make decisions on updates without industry's views.	Thank you for your comments.
E.ON Next (Energy Supply)	The proposed change arises from the concern that Distribution Network Operators (DNOs) currently lack control over modifications to the interaction protocols of other users with DNO equipment. This concern is valid, as a MEM or Supplier could potentially propose changes that the DNOs oppose but lack the authority to reject. However, transitioning to ENA governance will mean the exact opposite, and could lead to a scenario where DNOs have the ability to	Thank you for your comments.

	implement changes adversely affecting MEMs or Suppliers, without providing these entities the means to reject such changes. The ENA is a trade association exclusive to Energy Networks and its function is to promote the interests of its paying members so we would question whether this is a conflict of interest.	
Anonymous (Metering Equipment Manager)	We believe the proposed changes are not a suitable solution for the reasons outlined 1. The document in the REC provides good governance/control. 2. This provides a suitable appeals process for all parties under metering expert panel. 3. Moving to the ENA – having a unilateral approach to changes to the document is of no benefit to other REC parties. 4. Making perceived changes for the benefit of only the DNO's diminishes further the consumer experience and engagement as part of the Smart meting role out.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes. See Q4.	Thank you for your comments.
Scottish and Southern Electricity Networks (Distribution Network Operator)	SSEN support the solution as proposed, for the guidance to sit under ENA and not be subject to REC Governance.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We believe that the proposed solution addresses the concerns raised under R0145 and that the ENA is the correct body to have governance over the STIRG.	Thank you for your comments.
Association of Meter Operators	We do not believe that the proposed solution reflects good governance, whilst the proposed legal text does state that obligations cannot be	Thank you for your comments.

	applied unless MEP approves the change, this in itself sets an unusual precedence for REC governance. The document should follow the Legal Advisors advice that it should be Category Two document within REC. We believe this should be the case for the following reasons: 1. Having the document in the REC provides good governance. 2. If the management was placed with the Metering Expert Panel there would be an appeal process to the REC Change Panel and thereafter to the Authority which provides appropriate protection to Distributors and MEMs in the event of a disagreement. 3. Moving the document to the ENA would provide one category (Distributors) with the ability to implement a change without any means of appeal by the affected parties. 4. The ENA have suggested that REC could review the proposed change, but this does not provide a route to appeal. 5. Whilst the proposal includes a REC provision for MEP to approve any obligations to be placed in REC this leaves a position where if MEP rejects the change the STIR can still be changed and becomes incompatible with the REC. 6. Placing the STIR outside of industry controls places a disproportionate amount of power to the Distributors. In the event of a MEM proposing a change the proposed governance arrangements provide the Distributors with a veto with no right of appeal. 7. Having incompatibilities between ENA STIR & REC obligations brings about a number of risks: Safety proposals may not be accepted by distributors (we recognise that distributors currently	

	negotiate in good faith but this is not enshrined in Code Governance.) Proposals that may benefit the Consumer could be not accepted by the distributors for funding reasons. Divergence between REC & STIR create uncertainty	

Question 2:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
EDF (Metering Equipment Manager)	EDF does not agree with the original problem statement, and therefore the solution. It is not clear to us that the status of the STIRG document is impacting on the ability of involved parties to review and update the guidance as noted. The proposal to remove the STIRG from the REC and from the REMIT of the MEP is a regressive step which would potentially leave Electricity MEMs without a voice over something that materially impacts them. As noted previously the legal text states that the MEP only has the power to 'review and comment on any proposed changes', it does not have any formal power to vote on, or veto any changes, and there is no clear right of appeal. This is not acceptable and would result in CoMCoP mandating use of a guidance document that imposes obligations on parties who have no control or route for objection.	Thank you for your comments.
Energy Networks Association (Trade Association)	We agree that the proposed solution addresses the problem statement.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We recognise the perspective of DNOs on the governance of the STIRG and their collective desire to transfer that governance from the REC MEP to the ENA. From our perspective as a major energy	Thank you for your comments.

	supplier, we believe that, should such transfer take place, the REC MEP must continue to have a deciding role on any changes to the STIRG, as it would not be appropriate for changes to matters binding under the REC to be decided outwith REC structures.	
Scottish Power Energy Networks (Distribution Network Operator)	We agree that the proposed solution addresses the problem statement.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes.	Thank you for your comments.
E.ON Next (Energy Supply)	We do not agree that moving to ENA governance addresses the problem statement. It is essential to emphasize the transparency of the consultation process and to uphold equal voting rights across suppliers, MEMs and DNOS and this solution will not provide this. The draft legal text asserts that the REC Metering expert panel will review any changes but there is no mechanism for rejection of the changes or consultation with Suppliers/MEMS. We believe a code to which all affected members are signatories to remains the correct place.	Thank you for your comments.
Anonymous (Metering Equipment Manager)	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 believe the STIR should remain in REC – for reasons outlined in Q1.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes. Having the STIRG under ENA governance is appropriate since the guidance is about reporting on DNO assets.	Thank you for your comments.

Scottish and Southern Electricity Networks (Distribution Network Operator)	SSEN agree that the proposed solution addresses the problem statement.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes we believe that the proposed solution addresses the problem statement.	Thank you for your comments.
Association of Meter Operators	No. We believe this problem statement can be better achieved by retaining the STIR in the REC as a Category 2 document for the reasons shown in Question 1.	Thank you for your comments, although the Code Manager would like to note that the Guidance for Service Termination Issue Reporting document is currently a category 3 document rather than a category 2.

Question 3:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
EDF (Metering Equipment Manager)	The legal text should provide the MEP with a formal approval role for any changes to the STIRG.	Thank you for your comments.
Energy Networks Association (Trade Association)	It's unclear what "reviewed by REC MEP" means. Network Operators cannot accept a situation whereby approval from REC MEP must be obtained before any changes to the document are made. This would be no different from the current situation. We suggest that the legal text should state that the "*STIRG document will only be binding under REC if any changes made have first been discussed at REC MEP and any comments raised have been taken into consideration*".	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We note that the Initial Assessment Report states that: "This change has been raised by the ENA, to move the STIRG from REC governance to ENA. This is on the provision that any changes made to the STIRG must be reviewed and approved by the MEP before they are binding under the REC." However, the draft legal text amends Schedule 1 to state only that changes to the STIRG must be "notified" to the REC MEP. In our view, the definition of the STIRG should specifically state that such changes must be "approved" by the REC MEP before becoming binding under the REC. We believe that supplementary wording, set out in the table below, should be added to the STIRG definition. **STIRG Definition – ScottishPower Proposal Schedule 1** **Original Proposal:**	Thank you for your comments.

	Guidance for Service Termination Issue Reporting – means a guide for reporting and acting on DNO asset condition issues, as published from time to time by the Energy Networks Association; provided that changes to the document published by the Energy Networks Association shall only be binding under this Code if the Energy Networks Association has provided notice of the changes to the Metering Expert Panel. **ScottishPower Proposal:** for reporting and acting on DNO asset condition issues, as published from time to time by the Energy Networks Association; provided that changes to the document published by the Energy Networks Association shall only be binding under this Code if the Energy Networks Association has provided notice of the changes to the Metering Expert Panel and, following such notice, the changes have been approved by the Metering Expert Panel.	
Scottish Power Energy Networks (Distribution Network Operator)	There's uncertainly about what "reviewed by REC MEP" means. SPEN cannot accept a situation whereby approval from REC MEP must be obtained before any changes to the document are made. This would be no different from the current situation. We suggest that the legal text should state that the "*STIRG document will only be binding under REC if any changes made have first been discussed at REC MEP and any comments raised have been taken into consideration, approval is from the network Operators by way of an appropriate forum within the auspices of the ENA*.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Not at this time.	n/a
E.ON Next (Energy Supply)	Based on our position regarding this change, we do not consider that the proposed update to the legal text adequately reflects the interests of all affected parties. While we acknowledge the MEPs Committee authority for final approval, we strongly believe that there should be a vote among REC parties. The Metering Expert Panel (MEP) should consider the results of this vote before approving any changes.	Thank you for your comments.

Anonymous (Metering Equipment Manager)	This only provides the MEP a review function, no control or ability to accept change from Non ENA parties.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes. See Q4.	Thank you for your comments.
Scottish and Southern Electricity Networks (Distribution Network Operator)	SSEN believe it is unclear what "reviewed by REC MEP" means. Network Operators cannot accept a situation whereby approval from REC MEP must be obtained before any changes to the document are made. This would be no different from the current situation. We suggest that the legal text should state that the "*STIRG document will only be binding under REC if any changes made have first been discussed at REC MEP and any comments raised have been taken into consideration*".	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We have no further comments on the proposed legal text.	n/a
Association of Meter Operators	**The MEP ToRs state:** *The Metering Expert Panel shall review and comment on any proposed changes to the Guidance for Service Termination Issue Reporting document (governed by the Energy Networks Association).* This does not provide the MEP with any governance, only a review function which may or may not be accepted by the submitting party. Under the proposal it would be possible for MEP to decline and therefore not place obligations on MEMs but the Distributors could still update the version under their control resulting in unacceptable divergence.	Thank you for your comments.

Question 4:	The legal text states that the STIR document will only be binding under REC if it has been reviewed by MEP, to mitigate the loss of MEM and Supplier voting rights. Does this cover concerns you may have regarding this? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
EDF (Metering Equipment Manager)	No, it does not. Historically, Electricity MEMs have struggled to get the DNOs to accept prominent issues and introduce a new fault reporting code. 5 Examples are: - 1 Black phenolic cutouts with surface voltage 2 Back plastic cutouts failing i.e. short circuiting 3 PME B07 neutral connection problems. 4 Neutral diversionary/fault currents (still ongoing discussions) 5 Oversized fuses It is difficult to get the DNOs to agree to changes now, we expect this to become even more difficult under ENA governance. As noted previously, the MEP should have a formal approval role for any changes to the STIRG.	Thank you for your comments.
Energy Networks Association (Trade Association)	As happened under MOCOPA governance, Network Operators will always consult with MEM's (Meter Operators) whenever a change to the STIRG is proposed. Most changes to the document over recent years have been proposed by MEMs and then reviewed by Network Operators and most of the changes proposed have been accepted for implementation.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	As we have set out in our responses to Question 1 – 3, we are concerned that the current draft legal text does not in fact specify that any revisions to the STIRG require approval by the REC MEP to	Thank you for your comments.

	become binding under the REC, as advertised. As it stands, the draft amendments to Schedule 1 only require changes to have been notified to the REC MEP. The draft revised REC MEP Terms of Reference also make no mention of a requirement for MEP approval to changes to the STIRG made by the ENA. Our proposed wording in our response to Question 3 introduces an approval requirement into the STIRG definition in Schedule 1, which would address our current concerns.	
Scottish Power Energy Networks (Distribution Network Operator)	As happened under MOCOPA governance, SPEN will continue to consult with MEM's (Meter Operators) in collaboration with all network Operators whenever a change to the STIRG is proposed. Most changes to the document over recent years have been proposed by MEMs and subsequently reviewed by the Network Operators and most of those have been accepted for implementation.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Potentially, although we are not aware of any other document which has this set up within REC so this would have to be closely monitored to ensure the process works.	Thank you for your comments.
E.ON Next (Energy Supply)	The legal text does not reflect this intention. The proposed wording in schedule 1 states that the STIR document will only be binding if changes are notified to the MEP. Whilst the MEP terms of reference state that the changes will be reviewed these needs reflecting in schedule 1. There is no obligation on ENA to take the MEP comments into account so the issue that detrimental change could be introduced without challenge remains.	Thank you for your comments.
Anonymous (Metering Equipment Manager)	No. As it allows the Distributors to unilaterally change STIR even if it has been reviewed by MEP	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	The proposed changes to the Metering Expert Panel Terms of Reference (the "MEP ToR") and the definition of "Guidance for Service Termination Issue Reporting" in Schedule 1 – Interpretations and	Thank you for your comments. This is an error in the Initial Assessment Report – the summary should state that

	Definitions are not consistent with the intent expressed in the impact assessment document. That intent, as stated in section 1 – change proposal summary – is that "*any changes made to the STIRG must be reviewed and approved by the MEP before they are binding under the REC*". However, the functions and responsibilities assigned to the MEP under paragraph 1.2 of the MEP ToR include providing "*feedback on proposed changes made to the Guidance for Service Termination Issue Reporting document*" and, in section 4 of the MEP ToR - powers and functions of the MEP, it states that "*The Metering Expert Panel shall review and comment on any proposed changes to the Guidance for Service Termination Issue Reporting document (governed by the Energy Networks Association)*". Also, the proposed, amended definition of "Guidance for Service Termination Issue Reporting" states that it shall only be binding "*if the Energy Networks Association has provided notice of the changes to the Metering Expert Panel*". Consequently, either (a) the impact assessment document should be amended to clarify that it is not the intent of the change for the MEP to approve any changes to the Guidance for Service Termination Issue Reporting document and the intent is for the MEP just to provide comments for consideration by the ENA in its governance role or (b) the MEP ToR and the definition of "Guidance for Service Termination Issue Reporting" should be amended to reflect the intent expressed in the impact assessment document that the MEP is to approve changes to it.	changes are only to be reviewed by MEP, not approved. The intention for the legal text is that MEP will be required to review any changes, but not have any powers of approval.

Scottish and Southern Electricity Networks (Distribution Network Operator)	As happened under MOCOPA governance, Network Operators will always consult with MEM's (Meter Operators) whenever a change to the STIRG is proposed. Most changes to the document over recent years have been proposed by MEMs and then reviewed by Network Operators and most of the changes proposed have been accepted for implementation.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes we believe the amendments to the legal text addresses the concerns raised.	Thank you for your comments.
Association of Meter Operators	No. As mentioned elsewhere in this response the proposal generates incompatibilities as it allows the Distributors to unilaterally change STIR even if it has been reviewed by MEP. A change to the STIR in this way has the potential to place implied obligations on MEMs even if they are not placed in REC.	Thank you for your comments.

Question 5:	What lead time would be required for your business to implement the proposed solution? Please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
EDF (Metering Equipment Manager)	N/A	n/a
Energy Networks Association (Trade Association)	ENA will be ready to implement the proposed solution immediately following approval under the REC Change Process.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	Given that this proposal relates to governance changes to the STIRG, we believe that the lead time should be informed by the amount of time required for the REC MEP and the ENA to operate under this new arrangement, including establishing or clarifying the relevant lines of communication.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	SPEN is already committed and able to implement the proposed solution after the REC Change Process is complete.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	None, there would be no process changes required for this change.	Thank you for your comments.
E.ON Next (Energy Supply)	This could be implemented as soon as approved.	Thank you for your comments.
Anonymous (Metering Equipment Manager)	None.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	We will be ready to implement the proposed solution immediately following approval under the REC change process.	Thank you for your comments.
Scottish and Southern Electricity Networks (Distribution Network Operator)	SSEN understand that ENA are ready to implement the proposed solution immediately following approval under the REC Change	Thank you for your comments.

	Process. SSEN would be able to adopt this solution immediately, post approval.	
National Grid Electricity Distribution (Distribution Network Operator)	No lead time would be required to implement the proposed solution. We would require updates to our internal LWIs and review of any policy amendments which may be required to ensure there is clear signposting to the STIRG.	Thank you for your comments.
Association of Meter Operators	n/a	n/a

Question 6:	Would implementing the proposed solution incur any costs to your business? If so, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
EDF (Metering Equipment Manager)	Yes, there would inevitably be additional costs associated with the STIRG being passed to ENA governance.	Thank you for your comments.
Energy Networks Association (Trade Association)	Yes, the proposed solution would add an administrative burden and cost to the ENA business. However, ENA are agreeable to absorb these impacts in the interest of providing a suitable solution to the problem statement.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We see no notable operational or financial implications of this proposal to raise at this stage.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	There is no significant additional administrative burden or costs to SPEN.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.
E.ON Next (Energy Supply)	It is currently unknown whether this solution would incur any costs. However, there is a possibility of scenarios such as increased costs related to additional resource allocation for document modifications, time invested in retraining staff following any change proposals, and potential additional expenses due to revisiting customer premises if metering cannot be completed.	Thank you for your comments.
Anonymous (Metering Equipment Manager)	If this proposal was accepted and the Distributors unilaterally change the STIR, then as a MEM we could occur additional unforeseen or unbudgeted costs	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No.	Thank you for your comments.

Scottish and Southern Electricity Networks (Distribution Network Operator)	No, SSEN do not foresee any additional costs associated with the new categorisation of the STIRG. We understand that the proposed solution would add an administrative burden and cost to the ENA business. However, ENA are agreeable to absorb these impacts in the interest of providing a suitable solution to the problem statement.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	There would be minimal costs incurred.	Thank you for your comments.
Association of Meter Operators	If this proposal was accepted and the Distributors unilaterally change the STIR then AMO Members could incur additional unforecast costs including (but not limited to) Additional training; additional tooling; resourcing & financial.	Thank you for your comments.

Question 7:	Do you identify any benefits or risks to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
EDF (Metering Equipment Manager)	We believe this change would provide no benefits to our business and has considerable potential to be detrimental. As noted previously, there is a clear risk that, should the ENA not agree with industry concerns or initiatives, then potentially future scenarios may be overlooked in the STIRG, to the detriment of Electricity MEMs. For example, when the industry started to raise concerns over black phenolic cutouts with surface voltage, this issue was largely dismissed by the Distribution Business' to begin with. Our view is that the STIRG should remain within the REC due to the potential customer impacts which have not been fully defined or highlighted as part of this proposal. Some examples are listed below. • Electricity MEM time on site • Additional supplier costs • Customer safety and DNO inspection regimes • Implications that DNO equipment has on smart targets and subsequently supplier performance. • Additional training considerations	Thank you for your comments.
Energy Networks Association (Trade Association)	ENA and its Network Operator members have identified that under the new arrangements it will be much easier and less time consuming to process updates to the STIRG document, once the appropriate consultation has been undertaken with MEM parties via REC.	Thank you for your comments.

	We cannot identify any relevant risks under the new arrangements.	
Scottish Power Energy Retail (Energy Supplier)	We see no notable benefits or risks of this proposal to raise at this stage, provided that our concerns on the role of the REC MEP are addressed – namely, that the legal text provides that future changes to the STIRG are approved by the REC MEP, not simply notified to it, before becoming binding.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	SPEN's understanding is that the new arrangements will enable an easier and much less time-consuming process to update the STIRG document, once the appropriate consultation has been undertaken with MEM parties via REC. We cannot identify any relevant risks under the new arrangements.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No, providing industry have the ability to review any proposed changes to the document.	Thank you for your comments. MEP will have the power to review any changes proposed by ENA but will have no powers of approval.
E.ON Next (Energy Supply)	As outlined in the responses to questions 1, 2, and 4, the ENA is a paid membership organization exclusively for Energy Networks, in which suppliers and MEMs lack representation. Consequently, there is a risk that we, as a business, will not have formal representation to propose or directly respond to changes and that these changes may be detrimental to our business.	Thank you for your comments.
Anonymous (Metering Equipment Manager)	There are no benefits as a MEM to this proposal. Risks are outlined above.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	We consider that ENA governance of the STIRG will provide a more efficient process, such that updates to the STIRG will be easier and quicker to agree and action, following appropriate consultation with the relevant parties.	Thank you for your comments.
Scottish and Southern Electricity Networks	SSEN understand that under the new arrangements it will be much easier and less time consuming to process updates to the STIRG	Thank you for your comments.

(Distribution Network Operator)	document, once the appropriate consultation has been undertaken with MEM parties via REC. SSEN see the benefits of implementing this solution, allowing for urgent updates to be made and communicated across industry in regard to safety incidents or updated best practice. We cannot identify any risks under the new arrangements.	
National Grid Electricity Distribution (Distribution Network Operator)	None currently.	Thank you for your comments.
Association of Meter Operators	We do not believe there are any benefits to MEMs in this proposal. We have listed a number of risks elsewhere in this response. We also believe that are not any benefits to consumers in this proposal	Thank you for your comments.

Question 8:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
EDF (Metering Equipment Manager)	N/A	n/a
Energy Networks Association (Trade Association)	The STIRG document is a valuable industry resource. It was significantly improved during its time under MOCOPA governance which is a testament to the excellent level of collaboration between Network Operators and Meter Operators during that time. All updates made under MOCOPA were done so as not to place undue burden on parties and the document has undoubtedly helped to improve the customer journey during interventions work. We are very confident that under ENA governance this will continue.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We have no further comments to make on this proposal at this stage.	n/a
Scottish Power Energy Networks (Distribution Network Operator)	The STIRG document is a valuable industry resource. It was significantly improved during its time under MOCOPA governance which is a testament to the excellent level of collaboration between Network Operators and Meter Operators during that time. All updates made under MOCOPA were done so as not to place undue burden on parties and the document has undoubtedly helped to improve the customer journey during interventions work. Spen is confident that under ENA governance this will continue.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Not at this time.	n/a
E.ON Next (Energy Supply)	No.	n/a

Anonymous (Metering Equipment Manager)	Under MOCOPA, the members had equal voting rights and opportunity to review, under REC those rights are protected. This has no benefit to any MEM, supplier or end user.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	The STIRG document is a valuable industry resource. It was significantly improved during its time under MOCOPA governance which is a testament to the excellent level of collaboration between DNOs and Meter Operators during that time. All updates made under MOCOPA were made with a view to not placing undue burden on the parties, which has undoubtedly helped to improve the customer journey during interventions work. We are very confident that this will continue under ENA governance.	Thank you for your comments.
Scottish and Southern Electricity Networks (Distribution Network Operator)	The STIRG document is a valuable industry resource. It was significantly improved during its time under MOCOPA governance which is a testament to the excellent level of collaboration between Network Operators and Meter Operators during that time. All updates made under MOCOPA were done so as not to place undue burden on parties and the document has undoubtedly helped to improve the customer journey during interventions work. SSEN is very confident that under ENA governance this will continue. Under a new regime the process of updating and communicating changes will be much improved, both for customer journey and MEM safety perspective.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	None.	n/a
Association of Meter Operators	We believe this should remain in REC as a Category Two document as this provides good governance and transparency, both of these would be lost if the current proposal is approved. We recognise that the equipment identified in the STIR is owned by the Distributors, however, we also note that Distributors do not hold an	Thank you for your comments, although the Code Manager would like to note that the Guidance for Service Termination Issue Reporting document is currently a category 3 document rather than a category 2.

	asset register and therefore have little knowledge of their equipment which is situated in a consumer premise. In the vast majority of cases it is a visit by a MEM that identifies any anomalies in the distribution installation, some of these will relate to discrepancies in the STIR. As smart meters are installed in premise visits will be much reduced. One effect of this is that it makes the STIR a much more valuable safety document. If the distributors were able to veto MEM change proposals then the STIR may not reflect what is actually installed. This discrepancy would potentially lead to needing additional time on-site which in turn accrues additional costs to the MEM & Suppler and increase consumer costs. There are recent examples where MEMs would like to see a change to STIR but where these proposals are opposed by the distributors. These include instances such as surface voltage, phenolic cut-outs, neutral diversions. If the STIR was retained in REC then due process would be applied to any proposed changes. It is important that the industry operates under good governance and does not allow one party to impose obligations on another party without appropriate consultation, discussion or appeals process. Similarly, a single party should not have a right of veto on any proposal. We believe that working collaboratively produces a better outcome for the consumer and that this is better achieved with the good governance the REC would provide.	