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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	**Final Recommendation**

CHANGE REPORT

R0177 – CHANGE SMART METER INSTALLATION CONSUMER SURVEY SPECIFICATION SURVEY QUESTIONS TO A REC CATEGORY 2 DOCUMENT

DOCUMENT VERSION	1.1
PROPOSED IMPLEMENTATION DATE	06/09/2024
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	CHANGE PANEL	**CHANGE PATH**	SELF GOVERNANCE
PRIORITY STATUS	LOW	**URGENCY**	STANDARD
IMPACTED STAKEHOLDERS	Energy Suppliers (Domestic and Microbusiness)		

LEAD ANALYST (SOLUTION LEAD)	SUBJECT MATTER EXPERT
CAROLINE FREIMULLER	LORNA MALLON
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OVERVIEW

To allow REC Parties, in particular Energy Suppliers, to raise Change Proposals or issues against the Smart Meter Installer Domestic and Micro-Business Customer Surveys, a change has been submitted to make these documents Category 2 in the REC Baseline Statement.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 06 September 2024.

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BACKGROUND

1 SUMMARY

As part of R0152 Revision to the Consolidated Metering Code of Practice (CoMCoP) solution development discussions, it was raised that the mandatory Smart Meter Installer survey questions have not been reviewed since they went live at the start of the Smart Meter rollout several years ago. It was agreed that a review of those questions could not sit under the scope of R0152 as the questions are not held in CoMCoP. This prompted questions about how Suppliers could trigger a review of the questions as they are not anywhere in the REC Baseline Statement. This issue was taken to the REC Issues Group for further discussion and Suppliers were given the opportunity to raise potential solutions.

Feedback from these sessions resulted in the suggestion that the best way for this to be addressed was for the Smart Meter Installer Domestic and Micro-Business Customer Surveys to be added to the REC Baseline Statement as category 2 documents. This will allow anyone to raise changes or issues against these questions and there be a defined change process to follow.

2 PROBLEM STATEMENT

The Smart Meter Installation Consumer Survey Specification questions are mandatory for Energy Suppliers to use, but there is no mechanism for Energy Suppliers to raise changes or issues against the questions as they are not held in the REC Baseline Statement.

3 IMPACTS

CONSUMERS
Indirect impact

REC PARTIES AND SERVICE USERS
Energy Suppliers

REC DOCUMENTS / PRODUCTS
REC Baseline Statement
Smart Meter Installer - Domestic Customer Survey
Smart Meter Installer - Micro-Business Customer Survey

MHHS DESIGN
No impact

MHHS DATA SPECIFICATION
No impact

MHHS CODE DRAFTING
No impact

4 CROSS CODE IMPACTS

There are no cross-code impacts associated with this change.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Change Proposal		**05-Jul-24**	**09-Aug-24**
	Consultation	05-Jul-24	26-Jul-24
	Final Determination	09-Aug-24	09-Aug-24
Voting		**20-Aug-24**	**20-Aug-24**
	Appeal Window	21-Aug-24	05-Sep-24

6 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	2	27	53
	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	0	14	0
Resource	Complexity / Effort / Duration		1	9	9
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	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	0	10	0
				Overall Priority Score (rounded)	93

Priority Status	LOW
Change Proposal Type	STANDARD

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SOLUTION

7 SUMMARY OF ANALYSIS UNDERTAKEN

Speaking with Parties after this was raised during R0152 work group and at the REC Issues Group, it was determined the Code Manager would raise this change to make the surveys category 2 documents. It was also suggested that they could be made appendices to CoMCoP, but this was decided not to be the optimum route as then the Performance Assurance Board could not be made the responsible committee.

8 PROPOSED SOLUTION

The proposed solution is to upgrade the Smart Meter Installer – Domestic Customer Survey and the Smart Meter Installer – Microbusiness Customer Survey documents to category 2 documents.

It is proposed they will sit in the Operational Documents section of the REC Baseline Statement and have the Performance Assurance Board as their responsible committee.

No changes to the documents or questions will be made under R0177.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0177 can be found here.

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PRELIMINARY ASSESSMENT

10 KEY RISKS, ISSUES, ASSUMPTIONS AND DEPENDENCIES

No risks, issues, assumptions or dependencies have been identified for this change.

11 BUSINESS CASE ASSESSMENT

11.1 COSTS

There are no anticipated costs associated with the implementation of R0177.

11.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
PARTIES CAN RAISE ISSUES/CHANGES AGAINST THE SURVEY QUESTIONS	The Smart Meter Installer – Domestic Customer Survey and the Smart Meter Installer – Microbusiness Customer Survey becoming category 2 documents means that anyone (REC Party or otherwise) can raise a change or issue against them. They will also be subject to the documented Change Process under the REC meaning impacted Parties will be given the opportunity to provide feedback via Party impact assessment and/or consultation for Code Manager review on any raised changes/issues.
EASE OF LOCATING THE SURVEY QUESTIONS	Other feedback received alongside the inability of Parties to raise changes/issues against the questions was often it was difficult to locate where they are within the REC Portal. This change will move them into the Operational Documents section alongside CoMCoP and the Performance Assurance Report Catalogue (PARC), both of which reference the Smart Meter Installation survey questions. Having these documents grouped together hopefully provides a more logical place for them to sit on the REC Portal and makes it easier for Parties to locate them.

11.3 COST BENEFIT ANALYIS SUMMARY

There are no costs associated with this Change Proposal and numerous intangible benefits, so the Code Manager believes there is a positive case for change. Having the Smart Meter Installer – Domestic Customer Survey and the Smart Meter Installer – Microbusiness Customer Survey documents as category 2 means they are subject to the REC Change Process and increases confidence there is adequate governance over them.

12 CASE FOR CHANGE

The Code Manager considers there is a positive case for change for implementing this Change Proposal on the basis that the proposed solution:

- Is both viable and implementable, and effectively resolves the problem statement;
- Has no associated costs and has proportionate effort required for implementation; and
- Balances the need for Parties to be able to raise changes against mandatory obligations, with the governance provided by the REC Change Process to ensure that the best outcomes are provided for Consumers.

13 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 04 July 2024 to obtain views on the Preliminary Change report. In total 6 responses were received from one Distribution Network Operator (DNO) and 5 Energy Suppliers, which have been published here. The key themes from these responses have been summarised and set out below.

13.1 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

All respondents agreed that the proposed solution solves the problem statement for this Change Proposal.

One Energy Supplier did comment on the solution that they feel the most appropriate responsible committee for the Smart Meter Installation Survey questions once they are category 2 documents would be the Metering Expert Panel (MEP), rather than the PAB as currently stated in the legal text. The Code Manager has reviewed this suggestion and determined that because the questions are used by Performance Assurance for assurance monitoring purposes, it is most appropriate for the PAB to be the responsible owner of the questions.

13.2 BENEFITS RELATIVE TO IMPLEMENTATION AND OPERATIONAL COSTS

All Suppliers identified benefits to their business in their being able to raise changes against the questions and there a clear change path for the Smart Metering Installation Survey questions to follow.

No immediate costs were identified by any Parties, although one Energy Supplier did note that because the survey is conducted by a third party there may be unforeseen costs if there are numerous changes to the questions.

13.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

All respondents agreed there was a case for change for progressing this change proposal and agreed with the Code Manager's recommendation for the Change Panel to approve this change.

13.4 IMPLEMENTATION APPROACH AND DATE

All respondents agreed with or had no feedback on the Code Managers proposed implementation date of 06 September 2024, with 3 Parties noting they would like the solution to be implemented as soon as possible.

14 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No amendments have been made to the solution or legal text following the consultation.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
[CONSOLIDATED CONSULTATION COMMENTS AND CODE MANAGER'S RESPONSES]	Link

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16 GLOSSARY

TERM	DEFINITION
Consolidated Metering Code of Practice (CoMCoP)	means the code of practice against which relevant ASPs, MEMs and MIs are assessed pursuant to the metering Accreditation Schedule.
Consumer	means any person supplied (or seeking a supply) of Energy at an RMP (whether or not that person also exports or is seeking to export electricity at an RMP).
Domestic and Micro Business Customer Survey Templates	means a document of that name published by the Code Manager from time to time on the REC Portal.
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.