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CHANGE PROPOSAL PLAN

R0182 – LEVELISATION RECONCILIATION ELECTRICITY SINGLE-RATE/MULTI-REGISTER SPLIT

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RESPONSIBLE COMMITTEE	CHANGE PANEL	CHANGE PATH	AUTHORITY DETERMINED

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	27/08/2024

LEAD CHANGE ANALYST



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CHANGE OVERVIEW

This Change Proposal seeks to introduce the necessary governance and charging amendments to existing Payment Method Levelisation (PML) Reconciliation arrangements (introduced in R0147) to allow for multi-register reconciliation. The amendments will allow for an ongoing reconciliation that accounts for split in both single-rate and multi-register Metering Assets. Additionally, it will also allow for a one-off retrospective recalculation for the period dating from the proposed effective implementation date of 01 January 2025 back to the implementation of the original reconciliation mechanism on 01 April 2024.

KEY MILESTONES

	FROM	TO
PARTY IMPACT ASSESSMENT	26/07/2024	09/08/2024
CONSULTATION	30/08/2024	20/09/2024
RESPONSIBLE COMMITTEE DECISION	15/10/2024	15/10/2024
AUTHORITY DETERMINATION SENT	16/10/2024	16/10/2024

1 SCOPE

1.1 IN SCOPE

This document details the plan for the impact assessment and consultation for this Change Proposal following the completion of the solution development by RECCo. The change has been identified as an 'Urgent' change with a high priority score and the plan has been developed with this in mind.

1.2 OUT OF SCOPE

The updates to back-end processes required by RECCo to deliver a PML Reconciliation mechanism capable of distinguishing between single-rate and multi-register are out of scope of this Change Proposal.

2 REQUIRED ACTIVITIES AND STAKEHOLDER ENGAGEMENT

2.1.1 ANALYSIS & SOLUTION DEVELOPMENT

This Change Proposal has a fully formed solution, following a collaborative solution development cycle involving the Code Manager, RECCo, Capgemini and Ofgem prior to the Change Proposal being raised. Details of the proposed solution can be found in the solution document, found here.

2.1.2 IMPACT ASSESSMENT

The Code Manager proposes a shortened 10WD REC Party impact assessment, to be conducted between 26 July and 09 August. The Code Manager expects that 10WDs will be sufficient for impact assessment as REC Parties have already been assessed on the core elements of PML Reconciliation during the R0147 impact assessment. As R0182 represents an addition to existing PML Reconciliation functionality (which REC Parties have been aware of since before PML Reconciliation go-live), rather than a substantive modification, the Code Manager does not believe that lengthy impact assessment is required. Furthermore, this decision is substantiated by the fact that Ofgem have already engaged with Domestic Suppliers to inform them of the PML retrospective recalculation data requirement.

2.1.3 PRELIMINARY CHANGE REPORT DEVELOPMENT AND CONSULTATION

The Code Manager plans to publish the Preliminary Change Report on or before the planned 15WD Consultation on 30 August 24. The Code Manager does not expect that the Preliminary Change Report will need to be reviewed by the Responsible Committee prior to Consultation as this Change Proposal has been raised with a fully formed solution. However, there is sufficient time in the plan between the end of impact assessment and the Consultation to allow for an ex-committee decision should circumstances require.

2.1.4 WIDER STAKEHOLDER ENGAGEMENT

The Code Manager expects to work closely with both RECCo and Ofgem during the progress of this Change Proposal. Prior to the R0147 implementation and PML Reconciliation go-live, Ofgem issued a letter to market participants in March 2024 that reminded Domestic Suppliers that they would need to take part in the PML retrospective recalculation exercise. As part of their ongoing engagement with Domestic Suppliers, Ofgem have issued a subsequent letter reiterating the retrospective recalculation requirement, and informing them that data will be collected via a Request For Information (RFI). This letter can be found here.

Additionally, the Code Manager is planning a webinar to coincide with the publication of the REC Party impact assessment on 26 July 2024. This webinar will allow the Code Manager to support Parties as they complete their impact assessment activities.

2.1.5 FINAL CHANGE REPORT

A final assessment will be carried out to review the consultation responses and identify impacts affecting the change report and the Code Manager's Recommendation. The Final Change Report will be published on 04 October 2024 for a recommendation to be made to the Authority by 16 October 2024.

2.2 RAID

2.2.1 RISKS AND ISSUES

REF.	RISK	NOTES	MITIGATION
R0182.CPP.R001	Milestones in this change plan cannot be met due to the expedited nature of the plan	Milestones have been planned to support the urgency of this change and the Ofgem timetable. There is therefore, little contingency in the plan for unforeseen activities	The Code Manager and RECCo will resource appropriately to reflect the criticality and urgency of the Change Proposal

2.2.2 ASSUMPTIONS AND DEPENDENCIES

REF.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
R0182.CPP.A001	Impact on Domestic Suppliers as a result of the R0182 proposed solution will be minimal compared to R0147.	See rationale in section 2.1.3.	During impact assessment period.

REF.	DEPENDENCY	NOTES	STATUS
R0182.CPP.D001	PML Reconciliation mechanism changes must be completed alongside the progression of the REC Change Proposal.	The PML Reconciliation mechanism is owned by RECCo, and changes to this mechanism, including design and build phases, fall outside the scope of this Change Proposal.	Ongoing