RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

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

On 26 July 2024 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for R0182.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

DOCUMENT VERSION	1.0
RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	30/08/2024
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Lydia Bentley

DATE IMPACT ASSESSMENT ISSUED	26/07/2024
RESPONSE DEADLINE	09/08/2024

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Supplier	We have no further comments on the solution.	Thank you.

Question 2:	Do you believe there are any requirements that have not been documented? If yes, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Supplier	No further comments.	Thank you.

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<table>
<tr><td>Question 3:</td><td colspan="2">Do you have any comments on the proposed legal text?</td></tr>
<tr><td>RESPONDENT DETAILS</td><td>RESPONSE</td><td>CODE MANAGER COMMENTS</td></tr>
<tr><td>Scottish Power Energy Supplier</td><td>Please see below comments with regards to the legal text:

<u>PML Retrospective Recalculation – ScottishPower Proposal</u>
<table>
<tr><th>Schedule</th><th>Original Proposal</th><th>ScottishPower Proposal</th></tr>
<tr><td>Schedule 1 (Interpretations and Definitions)</td><td>PML Retrospective Recalculation - means the process for a one-off retrospective recalculation of the PML Reconciliation Amounts for each Domestic Supplier for the period 1 April 2024 to 31 December 2024 (inclusive) to account for the retrospective differentiation between single-rate and multi-register electricity metering arrangements from 01 April 2024.</td><td>PML Retrospective Recalculation - means the process for a one-off retrospective recalculation of the PML Reconciliation Amounts for each Domestic Supplier for the period <u>from</u> 1 April 2024 to 31 December 2024 (inclusive) to account for the retrospective differentiation between single-rate and multi-register electricity metering arrangements from ~~0~~1 April 2024.</td></tr>
<tr><td>Schedule 31 (Payment Method Levelisation Reconciliation)</td><td>11.1. As further described in this Paragraph 11, RECCo shall perform the PML Retrospective Recalculation utilising the data provided by the Domestic Suppliers under Paragraph</td><td></td></tr>
</table></td><td>Please refer to Change Report published on 30 August 2024 for full comments against each individual Scottish Power proposal.</td></tr>
</table>

	11.2 and the corresponding standing charges provided by the Authority.	
Schedule 31 (Payment Method Levelisation Reconciliation)	11.2. By 15 January 2025, each Domestic Supplier shall submit historical Payment Portfolio Data to RECCo for both single-rate and multi-register electricity meters for the months of April 2024 to December 2024 (inclusive) for the purposes of the PML Retrospective Recalculation. Where a Domestic Supplier has not submitted such Payment Portfolio Data to RECCo by such date, RECCo may use an estimate for that Domestic Supplier.	11.2. By 15 January 2025, each Domestic Supplier shall submit historical Payment Portfolio Data to RECCo for both single-rate and multi-register electricity meters for ~~the months of April 2024 to December 2024~~ each month for the period from 1 April 2024 to 31 December 2024 (inclusive) for the purposes of the PML Retrospective Recalculation. Where a Domestic Supplier has not submitted such Payment Portfolio Data to RECCo by such date, RECCo may use an estimate for that Domestic Supplier.
Schedule 31 (Payment Method Levelisation Reconciliation)	11.3. RECCo shall recalculate the PML Reconciliation Amounts for each Domestic Supplier for the months of April 2024 to December 2024 (inclusive) using the applicable data referred to in Paragraph 11.2.	11.3. RECCo shall recalculate the PML Reconciliation Amounts for each Domestic Supplier for ~~the months of April 2024 to December 2024~~ each month for the period from 1 April 2024 to 31 December 2024 (inclusive) using the ~~applicable~~ data ~~referred to in~~ provided under Paragraph 11.2.
Schedule 31 (Payment	11.4. This recalculation will determine the differences between the originally	11.4. ~~This~~ The PML Retrospective R~~r~~ecalculation will determine the

	Method Levelisation Reconciliation)	calculated PML Reconciliation Amounts for each respective month and the recalculated amounts based on the revised data.	differences between the originally calculated PML Reconciliation Amounts for each respective month and the recalculated amounts based on the revised ~~data~~ **methodology and newly provided data**.	
	Schedule 31 (Payment Method Levelisation Reconciliation)	11.5. Based on this recalculation (and subject to Paragraph 11.9), RECCo shall issue statements to each Domestic Supplier detailing the differences in the PML Reconciliation Amounts for each month from April 2024 to December 2024 (inclusive).	11.5. Based on this recalculation (and subject to Paragraph ~~11.9~~ **11.8**), RECCo shall issue statements to each Domestic Supplier detailing the differences in the PML Reconciliation Amounts for each month ~~from April 2024 to December 2024~~ **for the period from 1 April 2024 to 31 December 2024** (inclusive).	
	Schedule 31 (Payment Method Levelisation Reconciliation)	11.6. RECCo shall include any difference resulting from this recalculation, whether payable by RECCo to the Domestic Supplier or payable by the Domestic Supplier to RECCo, as part of the next payment cycle under this REC Schedule. Each Domestic Supplier must pay, in accordance with Paragraph 5, any additional PML Reconciliation Amounts payable by that Domestic Supplier as a result of the recalculation under this Paragraph 11.	11.6. RECCo shall include any difference resulting from this recalculation, whether payable by RECCo to the Domestic Supplier or payable by the Domestic Supplier to RECCo, as part of the next payment cycle under this REC Schedule. Each Domestic Supplier ~~must~~ **shall** pay, in accordance with Paragraph 5, any additional PML Reconciliation Amounts payable by that Domestic Supplier as a result of the recalculation under this Paragraph 11.	

Schedule 31 (Payment Method Levelisation Reconciliation)	11.8. Domestic Suppliers shall comply with any directions issued by RECCo or the Authority regarding the settlement of recalculated amounts concerning the PML Retrospective Recalculation.	~~**11.8. Domestic Suppliers shall comply with any directions issued by RECCo or the Authority regarding the settlement of recalculated amounts concerning the PML Retrospective Recalculation.**~~
Schedule 31 (Payment Method Levelisation Reconciliation)	11.9. RECCo shall complete the PML Retrospective Recalculation, and issue the updated statements, before the end of March 2025.	~~**11.9.**~~**11.8. By 31 March 2025,** RECCo shall complete the PML Retrospective Recalculation~~**,**~~ and issue the updated statements~~**, before the end of March 2025**~~.
Schedule 31 (Payment Method Levelisation Reconciliation)	Appendix 1 - Any fixed term contracts for all payment methods agreed prior to the decision ~~**date**~~[1] **date 23 February 2024** are not included	Appendix 1 - Any fixed term contracts for all payment methods agreed prior to ~~**the decision date**~~[1] ~~**date of**~~ **23 February 2024** are not included

Question 4:	**Will you be able to produce the required single-rate and multi-register data required on an ongoing basis from the implementation of this Change Proposal on or before 01 January 2025.**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Supplier	Yes, we will be able to produce the required single-rate and multi-registered data on an ongoing basis.	Thank you.

Question 5:	Will you be able to provide the retrospective data for April to December 2024 to RECCo by 15 January 2025?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Supplier	Yes, as above	Thank you.

Question 6:	Would implementing this change incur any costs to your organisation? If so, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
CONFIDENTIAL Scottish Power Energy Supplier		Thank you.

	DESIGN/ DEVELOPMENT COSTS	IMPLEMENTATION COSTS	ONGOING OPERATIONAL COSTS
REPORTING	£1687	£XX	£XX PER ANNUM
[SERVICE/SYSTEM]	£XX	£XX	£XX PER ANNUM
[SERVICE/SYSTEM]	£XX	£XX	£XX PER ANNUM

Question 7:	Do you identify any benefits to your organisation through the implementation of the proposed changes? If so, please provide details	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Supplier		-

Question 8:	What is your anticipated lead time for implementing this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Supplier		-

Question 9:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Supplier	We note that the Code Manager has proposed some “housekeeping” amendments to Schedule 31 in the draft legal text beyond the Retrospective Recalculation. We support those amendments.	Thank you.