RETAIL ENERGY CODE

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

CHANGE REPORT

R0202 - PERFORMANCE ASSURANCE REPORT CATALOGUE UPDATES (MHHS)

DOCUMENT VERSION	1.0
PROPOSED IMPLEMENTATION DATE	27 June 2025
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	PERFORMANCE ASSURANCE BOARD	**CHANGE PATH**	SELF-DETERMINATION
PRIORITY STATUS	CRITICAL	**URGENCY**	STANDARD
IMPACTED STAKEHOLDERS	ELECTRICITY REC PARTIES (SUPPLIERS, METERING EQUIPMENT MANAGERS, DISTRIBUTION NETWORK OPERATORS), DIP MANAGER		

LEAD ANALYST	ASSURANCE LEAD (SOLUTION LEAD)	SUBJECT MATTER EXPERT
HARRIET TRUSS	ANDREW WAGHORN	HELEN FOSBERRY
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OVERVIEW

This change seeks to update the Performance Assurance Reporting Catalogue (PARC) to capture data items required to continue to appropriately monitor Retail Risks under Market-wide Half Hourly Settlement (MHHS) industry arrangements.

CODE MANAGER MINDED TO POSITION

The Code Manager has a minded to position that the REC Performance Assurance Board (REC PAB):

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 27 June 2025.

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BACKGROUND

1 SUMMARY

The Code Manager has identified a number of changes required to the Performance Assurance Reporting Catalogue (PARC) following an impact assessment of the changes being made by the MHHS Programme to implement the new MHHS Target Operating Model (MHHS TOM). Following engagement with a selection of electricity Meter Operator Agents (MOA), updates to the PARC have been drafted and were reviewed at the 27 August 2024 REC Performance Assurance Board (REC PAB) for an endorsement for their progression to impact assessment under this Change Proposal.

2 PROBLEM STATEMENT

The PARC currently does not capture all the data items required to support the monitoring of Retail Risks following Market-wide Half Hourly Settlement go-live. An update to the PARC is required to include the data items that will ensure the Code Manager can provide the assurance the industry requires during transition and under the new MHHS arrangements.

3 IMPACTS

RECCO / REC CODE MANAGER	REC DOCUMENTS / PRODUCTS	REC PARTIES AND SERVICE USERS
REC Performance Assurance	Performance Assurance Reporting Catalogue	Meter Operator Agent

MHHS DESIGN	MHHS DATA SPECIFICATION	MHHS CODE DRAFTING
No impact	No impact	No impact – the PARC was out of scope of MHHS code drafting

MOAs will be the main REC Parties to be impacted by this change, with a new set of Data Items to report on Meter Asset Data required from them.

R0202, when raised included some housekeeping amendments. These are no longer in scope and Suppliers and Distribution Network Operators (DNOs) have been removed as impacted REC Parties.

The requirements and impacts to the Electricity Enquiry Service (EES) and the DIP Manager have been removed from the scope of R0202 and will be progressed under a separate Change Proposal.

The REC Code Manager Service Provider for Performance Assurance will be impacted as they will be receiving, ingesting and processing the additional information and data prescribed in the updated PARC.

There will be an indirect impact to Consumers due to the continued assurance this change will enable in relation to Retail Risk 7 'Inaccurate meter point master data results in billing errors that impact Consumers', therefore supporting billing accuracy.

4 CROSS CODE IMPACTS

No cross-code impacts have been identified in relation to this change over and above this change proposal being a key component of the REC delivery for MHHS.

5 PROPOSAL PLAN

The below revised Proposal Plan was submitted to the Change Panel for approval on xx March 2025:

Milestone	Activity	From	To	From	To
Change Proposal		**08-Aug-24**	**19-Nov-24**	**08-Aug-24**	**19-Nov-24**
	Initial Assessment	Completed	Completed	Completed	Completed
	Impact Assessment	September	January	Completed	Completed
	Solution Refinement	January	January	Completed	Completed
	Business Case Assessment	January	February	March	March
	Consultation	February	March	March	April
	Final Determination	March	March	April	April
Voting		**25-Mar-25**	**25-Mar-25**	**29-Apr-25**	**29-Apr-25**
	Appeal window	27-Nov-24	11-Dec-24	29-Apr-25	13-May-25

6 STAKEHOLDER ENGAGEMENT

This Change Proposal has been developed following industry engagement with electricity MEMs to help determine the possibilities of reporting to support the required monitoring. The draft proposed changes to the PARC were published as part of the REC Performance Assurance Board papers for the meeting on 27 August 2024. The REC PAB approved the proposed solution to be taken forward at that meeting.

Following the REC PAB and the approval of this Change Proposal Plan, the plan allowed for a Service Provider impact assessment by the EES Provider and a 15 Working Day (WD) Party Impact Assessment (Party IA) targeting Metering Equipment Managers, Distribution Network Operators and suppliers.

The Code Manager will consider impact assessment responses and develop the case for change. The Change Report will be published alongside a standard industry consultation of 15WD.

7 PRIORITY STATUS AND URGENCY

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	1	25	25
	Retail Markets Impact	Innovation and Market Arrangements	2	15	30
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	0	5	0
		Legal and Regulatory Compliance	2	13	25
Resource	Complexity / Effort / Duration		2	8	15
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	15	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		2		15
Urgency *(The need to progress a change to meet a targeted date)*		Significant Code Reviews	3	20	60
				Overall Priority Score (rounded)	178

Priority Status	CRITICAL
Change Proposal Type	STANDARD

The priority status for this Change Proposal is 'Critical' based on a weighted prioritisation score of 178.

SOLUTION

8 PROPOSED SOLUTION

8.1 PROPOSED SOLUTION FOR IMPACT ASSESSMENT

This change was raised directly as a Change Proposal as it had a fully formed solution.

The draft proposed solution was comprised of the following updates to the PARC:

Changes to Party data items:

- Addition of #860 data items for a new report from Electricity MEM.

Updates to centrally provided items:

- Addition of #1900 and #1910 data items to be provided by DIP Manager.

Housekeeping changes:

- Updated field names for Assessed End for Theft and Supplier investigation ID in #1341 - Commercial and #1341 Residential tabs to correct typographic errors.
- Removal of #1340 - Commercial and #1340 - Residential as they are replaced by #1341 - Commercial and #1341 - Residential respectively.
- Updated document links for Other Data Collection (#30-#39) to correct link.

- Updated Notes re Submission for #30-#39 to clarify submission SLA of 5WD following reporting month end.

8.2 PROPOSED SOLUTION FOR CONSULTATION

The Code Manager's risk consideration included two elements:

- As Meter Points are migrated to new arrangements or returned to legacy arrangements through Change of Supplier or Change of Agent process, there is a risk that Meter Technical Details (MTDs) will not to be transferred completely and accurately impacting data quality of MTDs across the market.
- During enduring operations, there is a risk that following meter works, MTDs are not updated completely and/or accurately.

This solution looks to use the results of a comparison to both monitor specific issues arising as a result of MHHS migration, including reverse migration, events but also to support wider improvement to the monitoring of the complete, accurate and timely updating of meter data. Where data is missing or invalid this would form the basis of exception reporting and the intent is to use exceptions to both identify where action is needed and to understand and, where possible, address underlying root causes.

8.2.1 Descoped items

As there are outstanding questions on the provision of data from the DIP which cannot be answered until the DIP Manager has completed further work on the new reporting platform, the impact assessment from the DIP Manager has not been fully completed. The Code Manager is therefore progressing the solution for R0202 without the centrally provided data items to ensure MOA reporting can start in adequate time before MHHS Go-Live. The Code Manager expects to raise a separate CP as soon as possible to progress the DIP reporting requirements.

The housekeeping changes have also been removed from the scope of R0202, as these are being progressed separately under R0238 - Performance Assurance Reporting Catalogue - Annual Review.

8.2.2 Amendment to Party data items

Following Party IA, the Code Manager carried out a pilot with a volunteer MOA, who provided data for approximately 175k meter points for the purposes of the pilot. The Code Manager performed matching to an EES extract with the closest available snapshot data in order to confirm that the matching of Data Items was possible (for example to identify if any additional data mapping was necessary) and to gain insight into the level of differences noted.

Across the fields in-scope for the matching the level of potential exceptions varied between 0.3% and 3.2% of the population. This result was different for the number of register digits and meter location fields where a much higher level of difference was seen (with matching limited to applicable Smart Meters) – however the vast majority of these were related to installations prior to the 29 June 2023 date where the requirement to populate this data was established.

Comments regarding the potential for this level of differences were also identified in the Party IA responses.

Details of the potential exceptions were shared with the volunteer MOA who undertook sample based validation to confirm the potential exceptions were correct. This did not identify any issues with the approach or the matching performed and confirmed the impact of a particular known issue the MOA was already addressing. Some potential timing differences were identified which the Code Manager are engaging with the EES Provider about and may need to consider when designing the final exception identification rules, however they did not invalidate the underlying approach.

Overall, our conclusion from the exercise was that the proposed approach

- was viable and identified relevant and valid exceptions,
- did not inherently identify 'false positive' results and
- assuming the data shared by the volunteer MOA is broadly representative of the overall market, suggests that the level of exceptions that this exercise could identify is not excessive.

We would note that our proposed approach to the use of this data, including through the Data Cleanse Sprint Process, will also allow resolution activities to be prioritised should higher volumes of differences be noted. The volunteer MOA provided positive feedback on the exercise and did not identify any significant impediments to the proposed change.

As a result of their feedback and other comments in the Party IA we have however proposed a second, alternative, variant of the report format to allow for incremental provision of data for MOAs with larger data portfolios. This has been added as report 861.

The following adjustments have also been included to improve the report requirements:

- Additional notes on submission to clarify needs to include legacy and MHHS MPANs
- Added data item, 'Meter Operator Id'
- "Electricity Smart Meter Equipment (ESME ID)" amended to just "ESME ID" to match the Data Specification
- Removed three fields (Registered Supplier and the associated registration dates) as this is information the Code Manager will already have and is not required from the MOA

8.3 USE OF THIS INFORMATION

This information will be used to assess whether market processes are working as intended and to provide input into the Data Cleanse Sprint process to prioritise remediation of individual differences. Where they are not, the Code Manager will then investigate the cause and take appropriate action to resolve the issue. This could include improving processes, addressing Service Provider performance or tackling specific REC Party performance.

The Code Manager undertook an options assessment with RECCo and with the PAB which focused on the best way to achieve this, focusing on the following risks (which will be reflected in the Risk Register as part of regular updates prior to MHHS Migration commencing). In

performing this options assessment, we considered and prioritised the use of centrally available data (through existing and new sources) however in some cases, notably relating to Meter Technical Details, no feasible approach that did not require collection of data from Parties was identified.

Area	Risk Consideration	Monitoring/Assurance approach
Meter Technical Details (MTDs)	As Meter Points are migrated to new arrangements or returned to legacy arrangements through Change of Supplier or Change of Agent process, there is a risk that Meter Technical Details (MTDs) will not to be transferred completely and accurately impacting data quality of MTDs across the market. During enduring operations, there is a risk that following meter works, MTDs are not updated completely and/or accurately.	Monitoring of Meter Asset Installation/ Removal/ Exchange process. Use reconciliation of **MEM data** with **EES** Raise differences with Suppliers/MEM to resolve.
MEM appointments	During migration there is a risk that MEM appointments are not in place. This could be due (but not limited) to appointing the wrong MEM or the MEM de-appointed on change of market segment. Similarly, during enduring operations, there is a risk that MEM appointments are not in place meaning required meter fault resolution and other meter related activity cannot be performed.	Monitoring of MEM appointment process via exception **DIP IF-045 flow.** Raise exceptions with Supplier/MEM to resolve.
Switch Meter Readings	With the introduction of new settlement arrangements, there is a risk that Switch Meter Reading dispute processes are not transferred across correctly	Continue with DTN data request to monitor disputes process following Switch. Internal monitoring process to be amended to capture additional

Area	Risk Consideration	Monitoring/Assurance approach
	leading to issues impacting Consumer Switching.	Data Items (Market Segment) introduced by MHHS.
Supplier Meter Operations	There is a risk that REC Parties do not apply the correct process (Energisation status and Address updates) and timelines for each Metering Point they serve, depending on the arrangements that the Metering Point is being settled in. During enduring operations, there is a risk that REC Parties do not follow the correct process (Energisation status, Address updates) for each Metering Point they serve.	Query **EES** to determine the timely changes using below triggers: Energisation (**D0134, D0139**) Address (**D0381**)
EES Performance	There is a risk that EES does not meet its expected standard of service, causing downstream impacts on REC Parties and/or other REC Services.	To manage this, REC PAB monitor EES Performance monthly against the code requirements defined within the Service Specification document. We are expanding the scope of this monitoring with reporting from DIP on EES interface availability and response times.

The Code Manager recognises that the data will not always identify the root cause of data discrepancies, but intends to utilise the data to drive corrections and to support targeted root cause analysis where the data justifies this.

The Code Manager anticipates that the parameters for the comparison activity may require some adjustment during initial usage and feedback from Parties. As a rule, other data comparisons have tended to focus on differences older than one month to eliminate unnecessary pursuit of transitory issues.

The Code Manager expects to manage resolution of historic Data Items through the Data Cleanse Sprint Processes already established. These allow for both prioritisation of Data Items and also determination of practical interim targets where there are significant volumes of exceptions identified.

The Code Manager will provide visibility on the level of performance as well as actions being taken to REC Parties to tackle any performance issues directly, so that they can understand the use of this information.

The Code Manager will seek opportunities wherever possible to reduce the reporting burden on REC Parties. Should performance allow, the Code Manager will reduce the frequency of reporting for the larger reports (particularly #860) and will constantly be looking for ways to obtain the information from central sources, if at all possible.

8.4 IMPLEMENTATION DATE

The Code Manager proposes that the implementation date for this change is the standard REC release on 27 June 2025, but proposes that the first report should not be required from Parties until three months after the change is approved. This will be reflected in the 'Date First Required' column of the Party Reports tab of the PARC at implementation. Implementation in June allows for use of a standard REC release whilst ensuring reporting can be established ahead of MHHS Go-Live in September 2025 and potential benefits gained as early as possible.

9 DRAFT LEGAL TEXT

The revised draft legal text changes to deliver the proposed solution to R0202 can be found here. This captures the updated amendments to the PARC in blue text. The tabs that had included the DIP Reporting requirements and housekeeping amendments have been removed in full.

PRELIMINARY ASSESSMENT

10 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

10.1 REC PARTY IMPACT ASSESSMENTS

A REC Party Impact Assessment, targeting all Electricity REC Party stakeholders was published on the 13 September 2024. Four responses were received providing views from three Metering Equipment Managers and one DNO. One response was anonymous, and two responses were partially confidential.

The confidential responses will not be published; however, these have been considered in the Code Manager assessment.

The non-confidential responses have been consolidated and can be found on Change Proposal page on the REC Portal here.

METERING EQUIPMENT MANAGERS	• Responses raised a number of questions on the use of the data and potential limitations of the monitoring • All responses confirmed they were able to provide the data proposed in the new #860 report • No concerns were raised regarding the housekeeping changes

	• Responses indicated the costs to provide reporting would be minimal • All responses identified the benefit of increased visibility and accuracy of industry data • All responses suggested an implementation lead time of three months • A number of clarification questions were raised
DISTRIBUTION NETWORK OPERATORS	• Response supported that the solution provides for the continued appropriate monitoring of Retail Risks under MHHS • Did not foresee an impact from the proposed housekeeping changes

Impact assessments were also sought from central services for the provision of data. These requirements have been removed from the scope of R0202, as per section 8.2.1 above, the information gathered from those impact assessments will be shared through the subsequent change that will be progressed for those requirements.

11 KEY RISKS ISSUES ASSUMPTIONS AND DEPENDENCIES

10.1 RISKS AND ISSUES

No risks or issues have been identified.

10.2 ASSUMPTIONS AND DEPENDENCIES

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
R0202.A001	Any updates to the draft proposed solution as a result of REC PAB on 27 August 2024 will be confirmed prior to the REC Change Panel decision on the R0202 Change Proposal Plan.		Closed – PAB approval was received on 27 August 2024 with no updates to the PARC required
R0202. A002	Impacted parties will have the reporting in place by MHHS go live		Following impact assessment

NO.	DEPENDENCY	NOTES	STATUS
R0202.D001	The proposed solution to be taken forward will be confirmed by PAB prior to the impact assessment being issued		Closed – PAB approval was received on 27 August 2024 with no updates to the PARC required
R0202.D002	Any impacted REC Parties, the DIP Manager or REC Services will deliver reporting on time		Open

12 BUSINESS CASE ASSESSMENT

The business case for this change is linked to the delivery of the MHHS Target Operating Model. As noted above, Ofgem's Final IA estimated quantified net benefits to GB energy consumers of £1.6bn to £4.5bn over the period 2021-45. The Final IA also noted that implementing MHHS (including third party access to HH consumption data) should deliver significant additional benefits that could not be quantified in advance arising from increased competition, innovation and Consumer choice. As part of the Final IA, Ofgem sought to estimate the costs of implementing and operating under the new MHHS arrangements. Ofgem's central cost estimate was £541.3m over the period 2021-2045.

Following a further review of the assessment for the purposes of R0209 and other SCR code modifications to implement the code drafting for MHHS, Ofgem noted that the total implementation costs remain an order of magnitude lower than the quantified benefits that Ofgem estimated would result from introducing MHHS (to which the benefits that are not quantifiable would be added). Ofgem therefore remains of the view that MHHS can be expected to deliver significant net benefits to energy Consumers in Britain.

12.1 COSTS

COSTS	DESIGN/ DEVELOPMENT COSTS	IMPLEMENTATION COSTS	ONGOING OPERATIONAL COSTS
METERING EQUIPMENT MANAGERS	MINIMAL	MINIMAL	VARIED
REC PERFORMANCE ASSURANCE	The impacts from this change have been included as part of the overall impacts from MHHS and are included in the RECCo MHHS programme. These costs have therefore been considered in the Ofgem Final IA outlined above.		

12.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
MHHS PROGRAMME	Assurance of the data targeted through this Change Proposal has been identified as essential to the successful implementation and enduring operations under the new MHHS arrangements.
ACCURACY OF INDUSTRY DATA	Increased visibility and an increased incentive to rectify issues will result improved data accuracy in the industry

13 CASE FOR CHANGE

SELF GOVERNANCE

The Code Manager considers that there is a case for change to implement this Change Proposal, on the basis that:

- the proposed solution is fully formed and appropriately resolves the problem statement;
- there are limited costs associated with implementation of this change or ongoing operations;
- without implementation of this change, the Code Manager will not be able to assess whether market processes are working as intended and take appropriate steps to resolve issues;
- implementation of this change enables management of Retail Risks to ensure positive outcomes for Consumers and reduce risk to Consumer experience; and,
- a positive business case can be made, as set out in section 11 of this report.

14 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	03 RECPAB_24_0827_04E_Draft changes to the PARC for MHHS (27.08.2024) R0202 RECPAB_23_PARC V5.2 - REDLINE MHHS - MEM only 18.03.2025
CONSOLIDATED PARTY IMPACT ASSESSMENT RESPONSES	R0202 Consolidated Party IA Responses (Public) v1.0

15 GLOSSARY

TERM	DEFINITION
Data Integration Platform (DIP)	Event driven architecture data exchange solution being procured and implemented by the MHHS programme.
Data Item	means the most granular level of data defining a specific attribute in respect of a data type, the permissible values for which are defined and controlled in the Data Item Catalogue.
DIP Manager	The role of the DIP Manager is being defined under BSC Modification P474 'Ongoing governance, funding and operation of the Data Integration Platform (DIP)' and can be found in the BSC Section X (Glossary).
Market-wide Half Hourly Settlement (MHHS)	Market Wide Half-Hourly Settlement will utilise the ability of smart meters to record a customer's usage during each half hour period to move domestic and small non-domestic customers to half-hourly settlement. Medium and larger non-domestic consumers have been settled half-hourly since BSC modification P272.
Retail Risk	Means a risk that retail energy consumer outcomes and the effectiveness of the retail market are measurably and significantly degraded by a failure by a REC Service User or REC Service Provider to meet the objectives, standards and core processes under this code.
Switch Meter Reading	means the meter reading at the time of a Switch, as determined under the BSC or the UNC (as applicable).