RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0217 AMENDING CONTRACTUAL OBLIGATIONS FOR SIPS AT NON-DOMESTIC PREMISES

On 23 January 2025 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0217 Amending contractual obligations for SIPs at Non-Domestic Premises.

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	27/02/2025
RESPONSIBLE COMMITTEE	Metering Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE CONSULTATION ISSUED	23/01/2025
RESPONSE DEADLINE	14/02/2025

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree with the proposed solution	Thank you for your comments.
E.ON Next Energy (Energy Supplier)	Yes we agree with the proposed solution	Thank you for your comments.
IMServ (Metering Equipment Manager)	Yes	Thank you for your comments.
Anonymous (Metering Equipment Manager)	Yes, we agree with the proposed solution	Thank you for your comments.

Question 2:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	As per our comments provided via email to the Change Report (proposal plan), whilst we have no comments currently on the proposal as a whole, we would highlight that one point which does not appear to be covered is that all this work is completed at Whole Current meter points. However, generally whilst most domestic sites are WC, there are lots of commercial, non-domestic customers that are not WC. We believe that the red lining to Schedule 14should be amended to include the following: Contract with premises owner or occupier 21.2. Before a SIP undertakes any SIP Works at a premises, the SIP shall either: (a) For Non-Domestic Premises, enter into a contract with any owner or occupier of the premises and such a contract will include confirmation that the owner/occupier has obtained any permissions/consents required or the SIP to perform the SIP works **in accordance with paragraph 9 of the Metering Accreditation Schedule.**	Thank you for your comments. As the type of works allowed to be conducted by SIPs is already written into both the REC and DCUSA, the Code Manager does not feel it is necessarily to mention it here in this section regarding contracting.
E.ON Next Energy (Energy Supplier)	The proposed legal text does not account for where there is a domestic end-user in a non-domestic premise. In these circumstances the requirement for the non-domestic premise owner to give reasonable	Thank you for your comments. The definition of Non-Domestic Premise in REC Schedule 1 should preclude there being a Domestic end-user – “a premises at which

	notice to the occupiers and take account of any additional needs should remain We suggest the following amendment or similar 21.3. The SIP shall ensure that each such contract with an owner of a premises agreed in 21.2 (b) or 21.(a) if there are domestic occupiers at the premises contains…..	a supply of Energy is (or will be) taken wholly or mainly for non-domestic purposes, which is to be interpreted in accordance with the Energy Supply Licences." For any such instances where there is a Domestic end user, the Code Manager would expect this to be covered by the contract between the Domestic occupier and Non-Domestic owner.
IMServ (Metering Equipment Manager)	Yes – we support the proposed change to the wording as this is reflective of the intent set out by DCUSA in its Code wording which introduced this role.	Thank you for your comments.
Anonymous (Metering Equipment Manager)	We agree with the wording in the proposed legal text, the wording removes restrictions implied by the current wording in section 21.	Thank you for your comments.

Question 3:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree	Thank you for your comments.
E.ON Next Energy (Energy Supplier)	Yes we agree	Thank you for your comments.
IMServ (Metering Equipment Manager)	Yes, and to confirm there will be no costs incurred within our company to implement this change whereas there will be benefits in terms of our ability to offer this service to a wider range of customer types.	Thank you for your comments.
Anonymous (Metering Equipment Manager)	Yes, we agree with the Code Manager's assessment of the costs and benefits	Thank you for your comments.

Question 4:	Do you agree with the proposed implementation technique? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree	Thank you for your comments.
E.ON Next Energy (Energy Supplier)	Yes we agree	Thank you for your comments.
IMServ (Metering Equipment Manager)	Yes	Thank you for your comments.
Anonymous (Metering Equipment Manager)	Yes, we agree with the proposed implementation technique	Thank you for your comments.

Question 5:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the Metering Expert Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree	Thank you for your comments.
E.ON Next Energy (Energy Supplier)	Yes we agree	Thank you for your comments.
IMServ (Metering Equipment Manager)	Yes	Thank you for your comments.
Anonymous (Metering Equipment Manager)	Yes	Thank you for your comments.

Question 6:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 01 April 2025? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree	Thank you for your comments.
E.ON Next Energy (Energy Supplier)	Yes we agree	Thank you for your comments.
IMServ (Metering Equipment Manager)	Yes	Thank you for your comments.
Anonymous (Metering Equipment Manager)	We agree that the implementation date should be 01 April 2025.	Thank you for your comments.

Question 7:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	None	n/a
E.ON Next Energy (Energy Supplier)	n/a	n/a
IMServ (Metering Equipment Manager)	No	n/a
Anonymous (Metering Equipment Manager)	n/a	n/a