RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

REC ISSUE SUBMISSION FORM (COPY)

1 PERSONAL DETAILS

PROPOSER NAME *(Mandatory)*	Lee Stone
COMPANY *(Optional)*	Npower Commercial Gas Limited
COMPANY TYPE *(Optional)*	
TELEPHONE NUMBER *(Optional)*	
EMAIL ADDRESS *(Mandatory)*	Lee.stone@eonenergy.com

2 ISSUE SUMMARY

ISSUE TITLE *(Mandatory)*	Enabling Dual MSA & MSS (SVA MOA) appointments for WC connection types
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	Under the legacy/pre-MHHS arrangements the market is segmented by Measurement Class, (MC) for settlement purposes which is not sensitive to the Meter type that is installed or is to be installed. Except for Unmetered Supplies (UMS allocated to MC D) the current arrangements (pre MHHS) mean that the replacement of Traditional meters to either smart or Advanced metering equipment can be arranged without the need for the Change of Measurement Class (CoMC) process to be conducted concurrent with the meter exchange (MEX). The result of this means that it less complicated to install either meter type as the MEX process is disconnected from the existing market segmentation arrangements (HH and NHH), specifically if the traditional meter exchange is for an Advanced meter it can be conducted under MC A, so should a customer with a Whole Current (WC) connection opt to move to HH settlement then a CoMC from MC A to MC

	G can be conducted at a point in time after the MEX has.
WHAT IMPACT IS THIS HAVING? *(Mandatory)*	The MHHS baseline design moves the market segmentation to a combination of meter & connection type for settlement purposes so requires Traditional meter types with WC connections to be allocated to the Smart meter segment upon migration to the MHHS arrangements. This was a design choice to cater for most of the electricity market (where the customer choice of metering solution is not optional) because the largest number of Metering Systems is in the SVA market, the result of this means that 1. where non-domestic customer choice can be offered to non-domestic customers in line with Supplier Licence Condition (SLC) 39.13 & customers opt for Advanced metering solutions it creates a need for the Change of Market Segment (CoSeg) to be performed in line with a planned meter exchange date. 2. Where a customer (domestic or non-domestic) cannot be offered a choice of metering in line with Supplier Licence Condition (SLC) 39.13 but has an advanced meter installed in their premises, the Change of Market Segment (CoSeg) to be performed in line with a planned meter exchange date. Consequently, when a WC connection goes through a MEX from Traditional to Advanced, or from Advanced to Smart in the MHHS arrangements a new complexity is placed on suppliers because the CoSeg process must be tightly co-ordinated to a specified planned MEX date and processed through the MPRS within 3 Working Days of that date, otherwise the CoSeg process lapses. This arises because suppliers initiate the CoSeg process only once a planned MEX date is agreed with the Metering Service provider which is to be appointed. The complexity arises because the design removes the ability for the Metering Service to conduct direct customer contact to book MEXs in advance of a MEX as it is not appointed by virtue of the market segmentation being in conflict with the required type of meter that should be installed, e.g. an MSS agent appointment may only exist where Traditional or Smart

	meter is in place. Even if this was worked around (e.g. information shared via an information sharing web portal) the Metering Service could not proceed due to the lack of an existing appointment, so would have to come back to the supplier to initiate the CoSeg process, When compared to the legacy arrangements this has created additional burdens, increases the risk of failing to meet customer demand for their chosen meter solution, and ultimately acts to impede suppliers ability to meet its metering rollout targets.
WHAT DO YOU CONSIDER TO BE AN EFFECTIVE SOLUTION? *(Mandatory)*	To enable a solution that enables WC meters to enter the CoSeg process for both Smart to Advanced & Advanced to Smart segments once migrated to the MHHS arrangements that remains open indefinitely and completes when relevant IF/PUB-005s are issued to Supplier Meter Registration Service (SMRS), and enable a CoSeg to be conducted at the point the customer's choice of metering is confirmed to be advanced as opposed to concurrent with a MEX, removing the complexity that has been introduced for Advanced meter deployment once migrated to MHHS. Suggested red-lining for REC Schedule 14 provided.
IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE ISSUE THAT WOULD BE USEFUL? *(Optional)*	n/a
DOES THIS ISSUE RELATE TO AN EXISTING ISSUE RAISED OR AN EXISTING CHANGE PROPOSAL? IF SO, PLEASE PROVIDE DETAILS OF THE ISSUE OR CHANGE PROPOSAL.	Will be a related BSC CP

3 CONSUMER IMPACTS

WHICH CONSUMER TYPES WILL BE IMPACTED BY THIS ISSUE? *(Mandatory)*	☐ All ☒ Electricity ☐ Gas ☐ Domestic Prepayment ☐ Domestic Credit

	☒ Microbusiness ☒ Small and Medium Enterprise (SME) ☒ Industrial and Commercial (I&C) ☐ Other (please specify in the Additional information box below)
WHAT IMPACT WILL THIS ISSUE HAVE FOR THESE CONSUMERS? *(Mandatory)*	☒ Switching experience ☒ Billing accuracy ☐ Trust and confidence ☐ Safety ☐ Security of supply ☐ Ability to pay ☐ On site experience ☐ Achieving Net Zero ☐ Other (please provide details in the Additional information box below)
ADDITIONAL INFORMATION *(Optional)*	

DOES THIS ISSUE CONTRIBUTE TO THE ACHIEVEMENT OF NET ZERO? *(Mandatory)*	
ADDITIONAL INFORMATION *(Optional)*	

4 CODE IMPACTS

Does this Issue relate to or impact:

THE REC OR REC SCHEDULES? *(Optional)*	☐ Main Body ☐ Schedule 1 - Interpretations and Definitions Schedule ☐ Schedule 3 - Accession Agreement ☐ Schedule 4 - Company Governance ☐ Schedule 5 - Change Management ☐ Schedule 6 - Performance Assurance ☐ Schedule 7 - Energy Theft Reduction

	☐ Schedule 8 - Unbilled Energy Code of Practice ☐ Schedule 9 - Qualification and Maintenance ☐ Schedule 10 - Charging Methodology ☐ Schedule 11 - Prepayment Arrangements ☐ Schedule 12 - Data Access ☐ Schedule 13 - Transfer of Consumer Data ☒Schedule 14 - Metering Operations ☐ Schedule 15 - Metering Accreditation ☐ Schedule 17 - Secure Data Exchange ☐ Schedule 18 - Green Deal Arrangements ☐ Schedule 19 - Market Exit and Supplier of Last Resort ☐ Schedule 22 - Market Stabilisation Charge ☐ Schedule 23 - Registration Services ☐ Schedule 24 - Switching Data Management ☐ Schedule 25 - Central Switching Service ☐ Schedule 26 - Switching Service Management ☐ Schedule 27 - RMP Lifecycle Schedule ☐ Schedule 28 - Related Metering Points ☐ Schedule 29 - Address Management ☐ Schedule 30 - Resolution of Consumer Facing Switching and Billing Issues ☐ Schedule 31 – Prepayment Method Levelisation Reconciliation ☐ Schedule 32 - Electricity Supply to Hydrogen Electrolysers ☐ Schedule 33 - Non Domestic Change of Occupier ☐ Schedule 34 - Migration Schedule
ADDITIONAL INFORMATION *(Optional)*	

OPERATIONAL DOCUMENTS *(Optional)*	☐ Consolidated Metering Code of Practice (CoMCoP) ☐ Cross Code Steering Group Terms of Reference ☐ Performance Assurance Board Terms of Reference ☐ Performance Assurance Report Catalogue ☐ REC Change Panel Terms of Reference ☐ Smart Meter Installer Domestic Customer Survey ☐ Smart Meter Installer Microbusiness Customer Survey

ADDITIONAL INFORMATION *(Optional)*	

SERVICE SPECIFICATION *(Optional)*	☐ Central Data Service Provider Further Services Service Definition ☐ Central Switching Service Definition ☐ CSS Certificate Authority Service Definition ☐ Electricity Enquiry Service - Service Definition ☐ Electricity Retail Data Service Definition ☐ Gas Enquiry Service Definition ☐ Gas Retail Data Service Definition ☐ Green Deal Database Service Definition ☐ Secure Data Exchange Service Definition ☐ Switching Operator Service Definition
ADDITIONAL INFORMATION *(Optional)*	

API TECHNICAL SPECIFICATION *(Optional)*	☐ EES API Technical Specification ☐ GES Meter Asset Enquiry API Technical Specification ☐ GES Supply Point Switching API Technical Specification ☐ GES Supply Point Enquiry API Technical Specification
ADDITIONAL INFORMATION *(Optional)*	

THE DATA SPECIFICATION *(Optional)*	☐ Data Access Matrix ☐ Data Item Catalogue ☐ Market Message Catalogue ☐ Standards Definition ☐ Supply Number Format
ADDITIONAL INFORMATION *(Optional)*	

CENTRAL SYSTEMS OR REC SERVICES? *(Optional)*	☐ Central Data Service Provider Further Services ☐ Central Switching Service (CSS) ☐ CSS Certificate Authority ☐ Electricity Enquiry Service ☐ Electricity Retail Data Service ☐ Electricity Theft Tip Off Service ☐ Gas Enquiry Service ☐ Gas Retail Data Service ☐ Green Deal Central Charging Database ☐ Secure Data Exchange Service ☐ Switching Operator
ADDITIONAL INFORMATION *(Optional)*	

REC PARTIES AND/OR MARKET PARTICIPANTS? *(Optional)*	☐ AMR Service Providers ☐ Data Aggregators ☐ Data Collectors ☐ Data Services ☐ Smart Meter Data Retrievers ☐ DCC ☐ Distribution Network Operators ☒ Energy Suppliers ☐ EES Users ☐ Gas Transporters ☐ GDCC Users ☐ GES Users ☐ Green Deal Finance Parties ☐ Green Deal Providers ☐ Meter Asset Providers ☒ Metering Equipment Managers ☐ Shippers ☐ Third Party Intermediaries ☐ Virtual Lead Party ☐ Other (please provide details in the Additional Information box)
ADDITIONAL INFORMATION *(Optional)*	

OTHER INDUSTRY CODES? *(Optional)*	☒ Balancing & Settlement Code (BSC) ☐ Distribution Code Use of System Agreement (DCUSA) ☐ Smart Energy Code (SEC) ☐ Uniform Network Code (UNC) ☐ Independent Gas Transporter Uniform Network Code (IGT UNC) ☐ Data Integration Platform (DIP) Rules
ADDITIONAL INFORMATION *(Optional)*	BSC change to be raised

DOES THIS ISSUE IMPACT A SIGNIFICANT CODE REVIEW? *(Optional)*	No
ADDITIONAL INFORMATION *(Optional)*	

5 ISSUE PROGRESSION

DO YOU BELIEVE THIS ISSUE PROPOSAL MEETS THE CRITERIA FOR 'URGENCY' AND SHOULD BE PROGRESSED UNDER AN URGENT TIMETABLE? **IF SO, PLEASE PROVIDE JUSTIFICATION?** *(Optional)*	N/A
SDS ALIGNMENT - HOW CLEARLY THE CHANGE SUPPORTS OFGEM'S STRATEGIC DIRECTION STATEMENT AND HELPS DELIVER SDS PRIORITIES/OUTCOMES. *(Mandatory)*	We believe this aligns to the SDS as the change will better facilitate customer choice in metering where applicable and where not applicable enable a more streamlined process for changing meters concurrent with change of segment, so aligns to Improvements customer service and consumer outcomes as set out in the SDS.
IMPORTANCE - THE SIGNIFICANCE OF THE BENEFITS OR RISKS ADDRESSED (E.G., CONSUMER OUTCOMES,	As per previous statement on improving customer outcomes, in addition it will better enable suppliers to meet its condition 39 requirements by removing the 3 day processing Change of Market Segment SLA for the specific reason only.

COMPLIANCE/LEGAL RISK, SYSTEM/OPERATIONAL IMPACTS, MARKET FAIRNESS). *(Mandatory)*	
COMPLEXITY/ DELIVERY CONSIDERATIONS - HOW CHALLENGING IT IS TO DEVELOP AND IMPLEMENT (E.G., SCALE OF CHANGE, STAKEHOLDER ENGAGEMENT REQUIRED, SERVICE/SYSTEM IMPACTS, CROSS-CODE DEPENDENCIES, DELIVERY/TESTING RISK). *(Mandatory)*	It is understood that SMRS change will be required, however initial assessment is that the 3 day lapse rule is its systems is a configurable item within SMRS so it understood this change of low complexity.
ARE THERE ANY REQUIRED TIMESCALES FOR THE DEVELOPMENT OF THIS ISSUE? *(Optional)*	Feb 2027 (to align with the associated BSC CP)
ARE THERE ANY REQUIRED TIMESCALES FOR THE IMPLEMENTATION OF THIS ISSUE? *(Optional)*	N/A
ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THIS ISSUE WHICH MAY IMPACT ITS PRIORITY OR PROGRESSION TIMETABLE? *(Optional)*	This is cross code change in conjunction with a BSC CP.

6 ATTACHMENTS

ATTACH/PROVIDE ANY SUPPORTING DOCUMENTS TO BE SUBMITTED WITH THE FORM	