RETAIL ENERGY CODE

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REC ISSUE GROUP
MEETING NOTES

DATE	**08 September 2023, 10:00**
LOCATION	**By teleconference**

1 INTRODUCTIONS

The Chair welcomed attendees to the meeting of the REC Issue Group (RIG).

The Chair confirmed the agenda, asking for Any Other Business (AOB) to be raised at this time. The Chair highlighted that three AOB items were raised prior to the meeting, with no further AOB items being raised at this time. Later in the session, RIG members noted the following AOB items for discussion:

- Rejected D0205's.
- H100 Update
- CSS P1 Switching Incident

2 DATA CLEANSE UPDATE

The Code Manager Lead Analyst confirmed that the sprint is halfway through completion, due to end in December 2023. The aim of this discussion was to provide RIG members with an update on how the sprint is progressing.

The Code Manager Lead Analyst highlighted that trends are improving. They advised that an age analysis is still being worked on, the findings will be presented to PAB at the September meeting.

A RIG member asked if there was an update on the conversations between the REC Code Manager and Meter Asset Providers (MAPs) on resolving the invalid MAP ID issues. The Code Manager Lead Analyst confirmed an update will be provided at the next RIG meeting.

Action: The Code Manager to provide an update on the invalid MAP ID issues at the next RIG meeting.

A RIG member highlighted that there is an increase in the number of invalid MEM ID's being appointed to MPANs. They advised that these issues have been raised with the Contract Manager at the one Supplier they have identified, but currently properties can't

switch because of this issue. Another RIG member noted this will be picked up under their AOB item, to make other parties aware of the issue.

The Code Manager Lead Analyst highlighted that the MTC 5B report, is showing that volumes are increasing month to month. They elaborated that for the No meter MTC – No MSN report, the volumes were improving but there was a peak in August, whereby the volumes started to increase again. A RIG member noted they have seen instances, whereby they have updated the MTC and the MEM's, but the MSN hasn't been updated. They elaborated this could be caused by the increase of failures of flows from the MEM's. Another RIG member suggested that MTC's will be erased under MHHS, as they are no longer being used in the intended way and do not support Ofgem's view to use the latest data, which is in EES. They suggested that PAB should consider scrapping all MTC cleansing, advising that time would be more beneficially spent on focusing on MHHS data cleansing.

The Code Manager Lead Analyst thanked RIG members for their feedback.

2.1 THEFT TARGET METHODOLOGY INITIAL ANALYSIS

The Code Manager Lead Analyst provided an overview of the Theft Target Methodology Initial Analysis, and proposed changes which can be found on slides 6-8 of the pack here.

A RIG member asked how the non-Domestic incentive pots will be split for SME and Industrial & Commercial (I&C). The Code Manager Lead Analyst advised this will form part of the Consultation, to gain an indication of where that data could come from. They advised that previous industry feedback suggested that industry supported a non-Domestic split for SME and I&C. The RIG member agreed this is a good proposal, but logistically trying to obtain the data required could be difficult.

Another RIG member was keen to understand the rationale for the proposed change. They elaborated that with MHHS coming soon, it feels like it's being broken down to this granular level at the wrong time. The Code Manager Lead Analyst confirmed this is the initial analysis, but in September there will be a chance for parties to pick the options they would like to be progressed, through a Consultation.

Another RIG member noted that the overall performance of the industry for the previous completed reporting years has fallen short, with only 40% being achieved in 2022/2023. They asked if this could be analysed in more detail, specifically what the 40% means in terms of participation across the Supplier community and how many Suppliers contributed to the 40%. The Code Manager Lead Analyst confirmed the Consultation will provide a further breakdown of the 40% score. They elaborated that the theft scheme sits under the ownership of the RECCo Board, but the REC Code Manager will provide the changes to the methodology, to help improve the scheme.

Another RIG member asked what scheme year this change would start from. The Code Manager Lead Analyst confirmed the intention is for this to start on 01 March 2024. The RIG member noted a concern for Suppliers who have multiple MPID's, specifically if this new process will add more categories and cause complications. The Code Manager Lead Analyst suggested that this should be helpful feedback for the Consultation.

Another RIG member suggested that Suppliers may need to make adjustments to their internal systems to support this scheme. They elaborated that the lead time would need to be considered, although the next scheme year starts in March 2024, some Suppliers may need a longer lead time. One of the questions in the Consultation could be around how much lead time is needed, then Suppliers can make the assessment and feedback. The RIG member mentioned if Suppliers need different lead times, a transitional approach through the scheme year could potentially be an option. They elaborated this will allow Suppliers to achieve the March timeline but will also allow other Suppliers more time to make changes to their systems to support this.

The Code Manager Lead Analyst thanked RIG members for their feedback and confirmed all points raised will be taken on board.

3 R0132 – MARKET ROLE CODES

The Code Manager Lead Analyst provided an overview of R0132 – Market Role Codes, which can be found on slides 10 & 11 here.

A RIG member disputed that there are only 36 possible Market Participant Roles, claiming there are 62. They elaborated that these are 0-9, then upper case A-Z and lower-case A-Z. They further elaborated that in MHHS, several of the DTC flows will disappear, therefore the impact of this change will be dramatically minimised. They recommended that serious consideration should be given to using lower case Market Participant Roles, which will not affect the whole industry, whereas this proposal impacts every Participant and Role. The Code Manager Lead Analyst confirmed the BSC have explored the upper case and lower-case option, and an opportunity will be given for feedback within the Consultation and Impact Assessment.

Another RIG member questioned why Elexon have discounted the proposal to reuse existing role codes and for the dual usage of role codes. They elaborated that the expectation is for Elexon to present this to the SVG in October. They further elaborated that their main concern is the implementation timescales. The Code Manager Lead Analyst confirmed the proposed implementation date is June 2024.

Another RIG member expressed support for the suggestion to use the upper case and lower-case Market Participant Roles. They elaborated that this change would have a

significant impact and with a lot of other changes going on, that option should be revisited to try and minimise the impact.

The Code Manager Lead Analyst highlighted another potential option was to reuse redundant role codes, but Elexon discounted this for their own technical reasons. A RIG attendee suggested that it would be useful for Elexon to explain why this option wouldn't work. They further elaborated that although this will only impact 6 market messages in total, it impacts the header files for all the flows which are sent. Any parties who have these in the header files are using the DTN, will be impacted by this.

The Code Manager Lead Analyst advised that in the Initial Assessment Report, it notes that a space will be created for a second character, but it will only be used for the extension. They elaborated the field should allow for either one or two characters.

Another RIG member raised concerns with this change, specifically around the considerable effort and resource needed. They elaborated that although R0043 is dependent on R0132, R0132 is a huge change which is going to impact their billing and downstream systems. They further elaborated that a cost benefit analysis needs to be done.

The Code Manager Lead Analyst highlighted that the REC are concerned about the impact of this change, which is why it's been assessed as a critical change with an urgent timeline. They elaborated the concern is that Elexon don't see this change with the same degree of importance, therefore every opportunity is being taken to make sure industry are engaged.

Another RIG member highlighted every party is going to be impacted by this change, depending on which systems are used to generate flows. They elaborated that when the BSC present this to the SVG in October, they will be asking why particular solutions have been discounted.

Another RIG member asked if CMRC's are similar to SIP's, whereby they will be potentially deenergising meters, moving and reenergising the meters and then telling Suppliers they have been on site and undertaken the meter works. The Code Manager Lead Analyst advised there will be a contractual arrangement between CMRC's and Suppliers on the work carried out. They elaborated that a certain amount of pre work will be completed by Alt Han Co, to identify crowded meter rooms and then discuss with Suppliers the feasibility of reorganising those rooms. They further elaborated that the last resort will be to leave a meter deenergised.

The RIG member noted the flows which have been set up for a SIP to send, will now potentially be sent by a CMRC. They asked why the same role code can't be used. The Code Manager Lead Analyst confirmed this was discounted by the BSC. They elaborated that this has been explored several times, but the SIP is a different role to the CMRC, and they would not want to use the same role code for different types of party. The RIG

member mentioned that if there is an agenda item for the RIG on cross code, Elexon should send a representative, to allow them to put their view across to other members, also allowing RIG members to provide their feedback too.

Another RIG member mentioned that if bigger Suppliers are expressing their concerns with this change, then the impact on smaller Suppliers could be even bigger. They noted that change reports and weekly bulletins are issued to parties, but asked if there was a way for the REC to contact smaller Suppliers directly to understand the significant impacts particular changes can have on them. The Chair advised the Operational Account Managers (OAM's) do pick issues up when they meet with smaller Suppliers, but it's dependant on the appetite of these Suppliers to engage with the OAM's.

The Code Manager Lead Analyst advised engagement has taken place with Electralink, to ensure there is adequate coverage with their DTN users. They elaborated that potentially podcasts will be issued, which will allow parties who don't attend industry meetings to understand what is happening. They asked RIG members if they had any suggestions on other ways, they could potentially get smaller Suppliers engaged. A RIG member offered to contact the REC Code Manager after the meeting and offer views on how to engage with smaller Suppliers.

4 R0143 – NEW VALUE FOR SITE VISIT CHECK CODE (J0024)

The Code Manager Lead Analyst provided an overview of R0143 – New Value for Site Visit Check Code (J0024), which can be found on slides 13-15 here.

A RIG member advised that if DCP 411 is approved, the charges applicable are fixed charge and capacity. They noted DCP 411 needs to be approved before any consequential changes in market wide can be considered. They elaborated that the changes need to be on MHHS radar and when a decision has been approved, a solution can be determined. The Code Manager Lead Analyst mentioned the timescales for DCP 411 and R0143 are looking to be aligned, therefore when a decision has been made on DCP 411, a decision can be made on R0143.

Another RIG member asked if the recommendation was to reject DCP 411. RIG members confirmed this to be the case and a similar change to this was raised years ago, with that also being rejected.

The Code Manager Lead Analyst thanked RIG members for their feedback.

5 LLFC ID – DI50078/J0147 DISCREPANCY IN LOGICAL FORMAT

The Code Manager Lead Analyst provided an overview of LLFC ID – DI50078/J0147 Discrepancy in Logical Format, which can be found on slides 17-19 here. They mentioned

this discrepancy has existed for more than 7 years, but ideally it shouldn't be left as a known error.

A RIG member noted that the LLFC is displayed in the same way on the ECOES API as it is on the GUI. They elaborated that it's also displayed this way on the customer correspondence, as part of the requirements.

Several RIG members confirmed their system has a workaround for this issue. They elaborated that it's been a known issue for a long time, therefore parties know how to work around it. They further elaborated that trying to fix this issue might cause more issues.

The Code Manager Lead Analyst thanked RIG members for their feedback and asked if any further feedback can be provided before the next RIG.

6 R0062 – REMOVAL OF ERDA METERING POINT ENERGY FLOW CHANGE RESTRICTION

The Code Manager Lead Analyst provided an overview of R0062 – Removal of ERDA Metering Point Energy Flow Change Restriction, which can be found on slides 21-25 here.

A RIG member mentioned scenario one would be logical to implement. They asked what the benefit of scenario two would be. They elaborated that it should not be getting to the point where it's found on a switch, suggesting that if a Supplier takes on an import MPAN which is clearly flagged as an export MPAN in the registration data, it should be found sooner, rather than having to correct afterwards.

Another RIG member mentioned there is a need for an occasion, where there is a requirement to change the energy direction indicator more than once. They elaborated that the requirement to terminate an MPAN would be seen as customer detriment, rather than being able to correct an error.

The Code Manager Lead Analyst asked RIG member Suppliers if they maintain any records of how many RMP's have been terminated, as a result of where a correction is requested. A RIG member confirmed they would have records stored, but they would have to go looking for them.

7 CLASSIFICATION BASED ACCESS (OPEN DATA) CHANGE PROPOSAL

The Code Manager Lead Analyst provided an overview of Classification Based Access (Open Data) Change Proposal, which can be found on slides 27-35 here.

The Code Manager Lead Analyst noted at the last RIG, two upcoming change proposals were flagged, relating to data access. They elaborated that one change was focusing on a

new process for processing data access requests, with two different solutions provided. They further elaborated that the process would be to treat data access requests separately to normal BAU change proposals, therefore the changes wouldn't have to go through a prioritisation process. It was noted that with the two solutions provided, the REC Code Manager has decided to progress with the preferred solution, which was to leverage the category three change process, and R0118 has been drafted to support this. The Consultation for R0118 will be issued on 08 September 2023.

The Code Manager Lead Analyst mentioned the other change proposal flagged at the last RIG, will follow shortly and is around moving to classification-based access within the REC. They elaborated that no CP has been raised on this yet, RECCo are currently undertaking discovery work to understand where all the data sources are within the REC.

RIG members were comfortable with the proposal put forward by the REC Code Manager.

8 SDEP CHANGE PROPOSAL UPDATE

The Code Manager Lead Analyst provided an update on the SDEP Change Proposals, which can be found on slide 37 of the pack here.

No comments were raised by RIG members on this agenda item.

8.1 CHANGE PROPOSAL MERGE PLAN

The Code Manager Lead Analyst provided an update on the Change Proposal Merge Plan, which can be found on slide 39 of the pack here.

A RIG member noted R0009 had its appeal rejected, and asked what the status of it is. The Code Manager Lead Analyst confirmed the REC Code Manager recommended to reject R0009, which TEP agreed to. They elaborated that industry appealed the decision to reject, and this was sent to Ofgem for a final decision. Ofgem agreed with the Code Manager recommendation and the change has now been formally rejected.

9 R0136 – MARKET STABILISATION CHARGE

The Code Manager Lead Analyst provided an overview of R0136 – Market Stabilisation Charge, which can be found on slides 41-44 of the pack here.

No comments were raised by RIG members on this change proposal.

10 AOB

10.1 SENDING D0205'S TO MPRS

The RIG member provided an overview of the issue, advising that they wanted to highlight the concern and discuss whether checks should be introduced to stop this from happening.

The RIG member explained that as part of their supply gain process in electricity, they send a D0205 to update the agents they are appointing for those meter points. These updates are currently failing and when looking at the account in ECOES, the MPANs look incorrect. After investigation, they found that the previous Suppliers have been appointing MEMs who have been end dated in the market domain data, meaning they were no longer a MEM. This has resulted in MPRS rejecting the D0205 flows, as they are including incorrect data.

The RIG member mentioned previously under the MRA, an organisation wouldn't be ended in the market domain data, if they were still active.

Another RIG member highlighted that previously as part of a BSC obligation, an organisation used to have to demonstrate there were no MPANs sitting in their portfolio before the organisation could be end dated. Another RIG member confirmed this was correct.

Another RIG member noted this could happen more often under MHHS, Supplier Agents and Suppliers could create new MPIDs and close old MPIDs. They suggested that this could be more controlled, but it does create a potential opportunity for this to arise again. They further elaborated that it's important this is resolved quickly.

The Chair confirmed this will be formally raised as an issue and will be added to the RIG Issue Log. The Chair advised they will request Elexon send an attendee to the next RIG to discuss this in further detail.

A RIG member mentioned as part of the discussion next month, it would be beneficial to obtain the volume of numbers impacted. They elaborated that this affects customers being able to switch.

10.2 HYDROGEN H100 UPDATE

The Chair mentioned that a presentation was submitted as an AOB item by Southern Gas Networks (SGN), on the Hydrogen H100 project. The Chair elaborated that the presentation slides were uploaded to the portal, prior to this RIG meeting. The Chair noted the request by SGN is if required, they can come to the next RIG meeting and discuss the project in further detail. RIG members can contact the REC Code Manager if they would like SGN to do so.

10.3 CSS P1 SWITCHING INCIDENT

The Code Manager Lead Analyst provided an update on the lessons learned, following the CSS P1 Switching Incident. DCC have requested via the Switching Operator Issue Forum (SOIF), that parties provide feedback through a survey, with the deadline for responses being 08 September 2023.

The Code Manager Lead Analyst highlighted that RECCo, and the REC Code Manager will be conducting a wider lesson learned exercise. The DCC lessons learned will focus on a specific set of activities, but RECCo have a different view, which will enable them to ask broader questions and might end up with a different conclusion.

A RIG member mentioned a draft RFI had previously been issued to parties to collate feedback on the P1 Switching Incident, and asked what REC's position was on that RFI. The Code Manager Lead Analyst confirmed following feedback from RIG members, the RFI has been slightly tweaked, with an addition being made to focus on smart prepayment customers who were impacted. They elaborated this has been issued a short time ago and a two-week deadline has been set for responses.

The Code Manager Lead Analyst confirmed DNO's will be asked to provide feedback on the P1 Switching incident.

No further business was discussed, The Chair thanked members for their contribution and closed the meeting.