RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	Final Recommendation

CHANGE REPORT

I0215 – SCHEDULE 30 SWITCH METER READING PROBLEMS - REJECTIONS AND TIMINGS

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	TBD
IMPLEMENTATION APPROACH	TBD

RESPONSIBLE COMMITTEE	Change Panel	CHANGE PATH	Self-Governance
PRIORITY STATUS	Medium	URGENCY	Standard
IMPACTED STAKEHOLDERS	Electricity Suppliers		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

It has been reported that REC Parties may employ practices relating to the D0300 Market Message where the Code has not caught up, both in terms of Performance Assurance and regulatory oversight. This Issue seeks to explore Supplier D0300 practices to determine if Code changes are needed to improve robustness around the Disputed or Missing Switch Meter Reading processes.

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BACKGROUND

1 SUMMARY

Following a discussion at the REC Issues Group (RIG), the Code Manager is exploring the D0300 rejections process. Where a D0300 Market Message is received by a Supplier containing an alternative proposal for a Switch reading, the receiving Supplier, should they wish to reject this alternative reading, may respond with a further D0300 containing a rejection reason. Whilst the initial D0300 may be Rejected due to disagreements about the reading itself, it may also be Rejected for "technical" reasons, where the reading is not being queried, but supporting information within the Market Message is incorrect, such as a wrong recipient, or an incorrect format.

It has been suggested that the wording of Schedule 30 – Resolution of Consumer Facing Switching & Billing Issues is not sufficiently clear on how D0300 rejections relating to technical reasons are handled. As such, the suggestion given to the Code Manager during the discussion at the RIG is that technical rejections are being escalated unnecessarily.

Further to the above, the Code Manager is also exploring if Schedule 30, as well as the Performance Assurance Report Catalogue (PARC), sufficiently provide for scenarios where a D0086 may be sent in response to a D0300. In this scenario, a Supplier who sends a D0300 regarding a missing D0086 may receive a D0086 in response, which operationally resolves their problem, but leaves the initial D0300 without a second, response D0300 from the receiving Supplier.

As a result, the scope of this Issue is relatively broad; the Code Manager aims to explore how Suppliers interact with D0300s, in the context of both escalations and resolutions. This exploration will then look at whether the arrangements in Schedule 30 and the PARC sufficiently capture real-terms Supplier operational practice in regard of D0300s.

2 PROBLEM STATEMENT

Suppliers may interact with the D0300 process in a way that is operationally standard for them, but potentially not reflected in the Code. This means that the D0300 Market Message may either be escalated unnecessarily (including Performance Assurance checks), or may not be responded to, whilst still resolving the overall issue. This creates difficulties for executing REC Performance Assurance (RPA) activities, and may result in the Code not being as prescriptive as it otherwise might be.

3 IMPACTS

CONSUMERS	REC SERVICE PROVIDERS	RECCO / REC CODE MANAGER
All Consumers	-	REC Performance Assurance

REC PARTIES AND SERVICE USERS
Electricity Suppliers
Non Half-Hourly Data Collectors (NNHDCs)

REC DOCUMENTS / PRODUCTS
Schedule 30 – Consumer Facing Switching & Billing Issues
Performance Assurance Report Catalogue (PARC)

MHHS DESIGN
-

MHHS DATA SPECIFICATION
D0086 Changes

MHHS CODE DRAFTING
Schedule 30 Changes

The Code Manager expects that there may be a Consumer impact, as potential for disruption within the Switching Meter Read issues process can cause issues for Consumers. If processes designed to protect Consumers around their Switch are not adequate, this may result in detriment.

The Code Manager also expects an impact on its Performance Assurance function. This is because changes to the PARC may result from a review of D0300 practices employed by Suppliers. Equally, Suppliers themselves may be impacted, depending on how the review progresses, and what change results from that. Whilst conducting the planned review, the Code Manager expects that changes, should they result, will likely fall within either Schedule 30, or the PARC.

Additionally, the Code Manager also impacts an interaction between this Issue and the Market-Wide Half Hourly Settlement (MHHS) program. The MHHS program plans changes for the drafting of Schedule 30, as well as changes around how the D0086 Market Message is deployed. Some D0300 scenarios that the Code Manager wishes to explore involve a response via a D0086, and as such, relevant MHHS overlap will be considered.

4 CROSS CODE IMPACTS

At this early stage, the Code Manager cannot rule out impacts on the Balancing & Settlement Code (BSC), due to the D0086/MHHS impact identified above. The Code Manager will codify the BSC impact, and work with them as appropriate, as the Issue progresses.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**17-Dec-24**	**31-Mar-25**
	Solution Development	December	March
	Legal Review	March	March
	Impact Assessment	March	March
	Solution Refinement	March	March

6 STAKEHOLDER ENGAGEMENT

The Code Manager plans to work closely with Suppliers to ensure that their views and operational requirements are represented and acknowledged during solution development. Additionally, the Code Manager plans to engage more widely with industry during the progression of this Issue, at forums including, but not limited to the Change Issues Group and/or the REC Issues Group.

7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	2	27	53
	Retail Markets Impact	Innovation and Market Arrangements	0	17	0
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	1	14	14
Resource	Complexity / Effort / Duration		2	9	18
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		2	17	17
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	1	10	10
				Overall Priority Score (rounded)	126

Priority Score	Priority Status
171 and above	Critical
151 to 170	High
101 to 150	Medium
0 to 100	Low

Priority Status	MEDIUM
Change Proposal Type	STANDARD

Urgent Change Proposals meet the Criteria for Urgency as set out by Ofgem

This Issue has a priority status of Medium, based on a score of 126. This score has been calculated as follows:

- Direct Consumer Impact has been given a score of two, indicating moderate impact. This is reflective of the potential for disruption that issues within the Switching Meter Read issues process can cause for Consumers. If processes designed to protect Consumers around their Switch are not adequate, this may result in detriment.
- REC Operational Effectiveness & Efficiencies has been given a score of two, indicating moderate impact. This is reflective of the possibility for improvements within a foundational REC process that a successful solution to this Issue represents.
- Complexity/Effort/Duration has been given a score of two, indicating moderate complexity. This is because this Issue will likely necessitate a broad scope review of multiple critical processes, and requires engagement from multiple REC Parties.
- Contribution to Alignment with REC Objectives has been given a score of two, indicating moderate impact. This is because any review of D0300 usage represents an opportunity to drive continuous improvements in the operations of the REC.

All other metrics have been given a score of zero or one, as appropriate.

8 APPENDIX

CHANGE PROPOSAL	Link
REC ISSUES GROUP NOTES	Link

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9 GLOSSARY

TERM	DEFINITION
Disputed Switch Meter Read	means that the Switch Meter Reading is disputed by the Consumer, Losing Supplier or Gaining Supplier
Dispute	has the meaning given to that term in Clause 22.
Market Message	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
Switch	means a change to the Registered Supplier for an RMP.
Rejected	means the Registration Service Request Status as described in Paragraph 1.3 of the Registration Services Schedule.
Missing Switch Meter Reading	means that a Switch Meter Reading has not been obtained within the timescales required by the Resolution of Consumer-Facing Switching and Billing Problems Schedule.