RETAIL ENERGY CODE

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REC CHANGE ISSUES GROUP
MEETING MINUTES

MEETING	**RECCHIG_25_0206**
DATE	**06 February 2024, 10:00**
LOCATION	**By teleconference**

Presenter	Representing	Initials	Role
Glenn Sheern	REC Code Manager	GS	Chair
Caroline Freimuller	REC Code Manager	CF	Lead Analyst
Harriet Truss	REC Code Manager	HT	Lead Analyst
James Hardy	REC Code Manager	JH	Lead Analyst
Lydia Bentley	REC Code Manager	LB	Lead Analyst
Luke Coyle	REC Code Manager	LC	Lead Analyst
Lorna Mallon	REC Code Manager	LM	Subject Matter Expert
Harry Firth	REC Code Manager	HF	Secretariat

Full attendee list available upon request.

1. INTRODUCTIONS

The Chair welcomed attendees to the REC Change Issues Group (CIG) meeting.

2. CONFIRMATION OF AGENDA

The Chair invited any additional items of business for consideration during the meeting, but no items were raised.

3. APPROVAL OF THE PREVIOUS MINUTES

The Chair invited attendees to provide comments on the draft minutes from the meeting which took place on 05 December 2024. HF advised that no comments had been made prior to the meeting. There were no comments, and the minutes were approved as an accurate reflection of the meeting.

4. I0222 – ESME ID UPDATE REJECTIONS

LB provided attendees with an overview of the Issue. LB advised that the ESME ID is used as a unique identifier on a smart meter, and Electricity Retail Data Agent (ERDA) validation prevents multiple incidences of an ESME ID at a DNO ID level. LB added that whilst the validation is working as intended, an unforeseen consequence is that when a smart meter is re-used, the ESME ID will be rejected as it has already been logged against a previous MPAN, with I0222 looking into solution to modify the existing validation.

LB presented 3 potential solution options to attendees:

Option 1: Switch off ESME ID and MSN Validation:

- LB advised that this would immediately resolve all ESME ID rejections relating to re-used Smart Meters. They added that there are associated risks with this approach, and there is potential for the Code Manager to monitor ESME IDs using the Electrical Enquiries Service (EES), allowing for a more market-wide oversight compared to the current DNO-level validation.

Option 2: Accept any ESME ID associated w/ a Metering Asset w/ an "Effective To" date:

- LB advised that this Option would offset the risks identified under Option 1, but would require a longer lead time.

Option 3: Further Research: Explore why some ESME IDs remain w/ an MPAN post-Asset removal:

- LB advised that the Code Manager has been made aware that some ESME IDs stay with an MPAN even after the associated Smart Meter has been removed. They added that they were keen to hear from any attendees who have been experiencing similar issues. LB added that if this issue is sufficiently prevalent, the Code Manager may want to wait to make any validation changes until the discrepancy is resolved.

Supplier representatives advised that they would prefer Option 3 as they have had issues with ESME IDs being incorrect and suggested there may be more scenarios than what the Code Manager are aware of. Another Supplier representative advised that some of the scenarios may not be specifically caused by the ESME ID, such as if a meter connects to the wrong communications hub.

Several Supplier representatives advised that they would not be comfortable with the lack of validation set out in Option 1, and preferred Option 2. They added that if both Options 1 and 2 will be requiring changes to the current ESME ID validation system, then the potential lead times would not be too different. LB responded that more accurate lead times for each solution

option would be borne out of the impact assessments prior to a preferred solution being taken forward. LM added that they have not reached out to any DNOs yet but intend to do so soon.

A Supplier representative added that they would be in favour of Option 1, as it would affect fewer customers, particularly given the current lengthy process of validating ESME IDs for a change of Supplier. Another Supplier representative added that they would prefer Option 1 if it is the quickest solution to implement.

An Energy Software representative advised that Option 2 has already been implemented as part of IF005 and a potential fourth solution option would be to wait until IF005 has been migrated. They added that Option 1 would have an impact on MHHS as the validation in IF005 would need to be changed. LB responded that the Code Manager are aware that there will be an enduring fix to this issue post-MHHS go live, but I0222 is looking at a more urgent, short-term solution in the meantime. Supplier representatives agreed that they would be looking for a solution to be implemented as soon as possible.

A DNO representative advised that they would prefer Option 3 to undertake further research on the issue. A Supplier representative offered to reach out to the Code Manager to discuss further some of the issues they have encountered with ESME IDs. LM thanked the Supplier representative.

LB posted a poll listing the three proposed solution options, with 22 responses being received. Option 3 was the most popular option, with 40% of the vote, followed by Option 2 with 31% and Option 1 with 27%.

5. ISSUE UPDATE

HT provided attendees with a quarterly update on all raised Issues in the REC since the changes to the Change Management process were introduced in June 2024.

HT advised that:

- 46 Issues have been raised overall
- 15 Issues are at the Initial Assessment stage
- 22 Issues are at the Solution Development stage
- 3 Issues are out for Party Impact Assessments
- 2 Issues have been progressed to Change Proposals and have now been implemented
- 4 Issues have been withdrawn

6. I0196 - REVIEW OF METERING ASSET DATA TRANSFERRED FROM MAMS TO THE CDSP

LB provided attendees with an overview of the Issue. LB advised that the Code Manager is investigating cases where Data Item mismatches may arise during the passage of Metering Asset information from the MAM to the CDSP (both directly, and via the Supplier then Shipper).

LB advised that a Request for Information has been published by the Code Manager and will be open to responses until 28 February. LB added that the Code Manager are keen to hear from MAMs and Suppliers who are both directly involved in this process.

LB took attendees through the questions in the Information Request and provided more context to the REC parties linked to the Issue.

7. I0198 – MAM COMMUNICATION METHOD REGISTER

LB provided attendees with an overview of the Issue. LB advised that the Issue title had been changed to more accurately reflect the scope of the potential solution. They added that the Code Manager are not looking to reduce the number of communication methods for MAMs down to one, but rather to implement a register where MAMs can record which communication method(s) they use. LB added that the Issue is now only focused on MAM-MAM communications, rather than MAM-Supplier communications as previously discussed.

LB advised that their proposal of a Communication Method Register had been amended following feedback received at the December Change Issues Group meeting. They advised that currently the Code Manager is planning to make this mandatory for MAMs to complete, and that it would be hosted on the REC Portal.

LB presented the proposed solution to attendees, with 5 key Market messages included on the draft register. LB advised that the Code Manager has proposed to exclude MAM-Supplier communications and Consumer-appointed MAMs from the register to reduce the complexity of the register and allow easier use for all parties. They added that they were keen to hear view from the attendees on this proposal.

A Supplier representative advised that they would have found it useful to have the MAM-Supplier Communications recorded on the register, particularly as they have had difficulties with "uncontracted" MAMs previously who they have struggled to contact. They agreed with the point that it may make the register harder to use and suggested that a secondary, separate register could be implemented for MAM-Supplier Communications. LB agreed that this option could be investigated by the Code Manager.

An Xoserve representative advised that they have experienced problems with Supplier not actively appointing MAMs to metre points or not engaging when the MAM has indicated that they have not been appointed to a certain metre point. They suggested that a MAM-Supplier Communication Method Register could help to mitigate this issue. LB agreed to discuss this problem further offline.

An Energy Data representative asked about the investigate report produced by the Performance Assurance team that led to I0198 being raised, and whether it is available to look at. LB responded that it was discussed at the April 2024 REC Issues Group meeting and should also be available on the portal pages for both I0196 and I0198.

A Supplier representative asked how the success of the implemented Register would be measured, noting the limited reporting of some metrics at the moment. LB responded that they would have to speak to the Performance Assurance team about this further and this could be explored in the planned Party Impact Assessment.

Supplier representatives raised concerns that the Code Manager are no longer focusing on reducing the communication methods open to MAMs down to one, which they suggested should still be a long-term aim. LB suggested that this is still a long-term aim, with the register being a shorter-term solution. They added that whilst a single communication method would resolve the issue, other aspects must be considered, such as MAMs who have invested in the DTN or IX systems. A Supplier representative suggested that once the register has been completed in full, this should provide further information on the split of communication methods and how much work would be required to reduce to one communication method.

Next Steps:

LB advised attendees that a Party Impact Assessment for I0198 is expected to be released this month.

LB thanked attendees for their feedback in the meeting and added that they would be happy to receive any further questions or thoughts on any of the three issues discussed. They advised attendees to email any further feedback to Lydia.bentley@recmanager.co.uk.

8. I0223 - RECONCILIATION OF UNALLOCATABLE TRANSACTIONS REVIEW

LC provided attendees with an overview of the Issue. LC advised that this Issue is looking to implement improvements to the annual review of Unallocated Transactions older than 3 years that the Code Manager is currently required to carry out. LC added that the Issue will focus on trying to align the process for both electricity and gas.

LC advised that a Request for Information for I0223 closed in January and received 4 responses, with the key themes being that the current timeframes for the processes could be improved. LC added that the legal drafting is currently being prepared, with an aim to release a consultation soon.

An Energy Supplier noted that the Unallocated Transactions are allocated to Suppliers based on market share and asked what the market share is based on. The Chair responded that it is specifically based on prepayment meters (PPM), so each Supplier would receive an allocation based on their market share of eligible PPMs.

9. I0232 - NON-DOMESTIC CHANGE OF OCCUPIER SDEP SCREENS (R0155 SOLUTION)

JH provided attendees with an overview of the Issue. JH advised that this Issue has been raised following the approval of R0155 - Change of Occupier: Evidentiary Standards and Timescales earlier in the week. They added that the Ofgem decision is available to view on the R0155 portal page.

JH noted that a temporary solution on SDEP screens will be implemented as part of R0155. They advised that due to the MHHS Code freeze, the development of a permanent solution is limited. JH added that following feedback from Suppliers who are concerned about the issue, I0232 has been raised to begin work on development of a permanent solution with the aim of implementing as soon as possible once the MHHS Code freeze has been lifted.

JH invited attendees to discuss and determine the requirements for the dedicated Non-Domestic Change of Occupier SDEP screens, noting a separate screen will be required for both Gas and Electricity. JH added that the solution will also require reporting for Performance Assurance and will include a plan for queries raised at cut over and data retention obligations. JH presented some initial suggestions to attendees and asked for feedback on these suggestions as well as further requirements that could also be discussed.

A Supplier representative asked whether any specific timeframes are available for how quickly a solution can be implemented following the MHHS Code freeze. JH responded that this information is not available at the moment, but the Code Manager will share this as soon as possible.

A Supplier representative asked whether it will be SDEP screens that will be taken forward as part of the long-term solution, or whether the Code Manager are considering alternatives. JH responded that the Code Manager are going forward with SDEP screens, which were included within the solution for R0155.

A Supplier representative suggested that the solution may have limited reporting on all Supplier SLAs. LM responded that a separate change will be raised in the future on general reporting where there is not a switch. They added that Ofgem are currently consulting with Suppliers on this Change, and REC will raise a Change Proposal mirroring this once the Ofgem Change has been finalised. JH added that this separate Change will come to the Change Issues Group once it has been raised.

A Supplier representative queried what the proposed SLA of 10 working days is mandating Suppliers to do. JH and LM responded that the Supplier would have 10 days to accept or reject within the SDEP and explain why.

10. CONFIDENTIAL VS ANONYMOUS RESPONSES

CF informed attendees that the Code Manager had received feedback from multiple parties that it is unclear what the difference is between an anonymous and confidential response to a Consultation or Impact Assessment.

CF provided an overview to attendees of the different response types and how each type should be used. CF advised that a confidential response will only be shared with RECCO, the Code Manager, the Responsible Committee and where relevant, the Authority, and the response would not be included within any Change Reports or made available to other parties. An anonymous response would be included in all Change Reports, but the name of the organisation would be omitted, just the organisation type would be made available.

CF presented to attendees the proposed new wording to be included within all Consultation and Impact Assessment papers explaining the different type of responses. They asked for feedback on the proposed new wording and whether this provides extra clarity to Parties.

A Supplier representative asked if each individual question within the Consultation/Impact Assessment can be marked differently, or if the entire response must be confidential/non-confidential/anonymous. CF responded that responses can be marked wholly at the top of the template, or each individual question can be marked differently.

11. I0241 - MHHS INCREMENTAL CHANGE FOR M8

HT provided attendees with an overview of the Issue. HT advised that although R0209 – Implementation of MHHS Arrangements had approved REC Code Drafting to deliver MHHS Design, further change is now required with ongoing testing and further faults identified. I0241 has been raised to reflect these design changes within the REC, which are crucial to the successful implementation of MHHS.

HT outlined the scope of I0241 and advised that the Change Issues Group will work through this list of identified changes, plus potentially more changes that may be added in the coming weeks and months. Solution development of I0241 will be worked through a series of impact assessments, before the Issue is raised as a Change Proposal. HT presented slides to attendees providing more focus on the scope of I0241.

HT advised that it is expected to be a Significant Code Review Change Proposal, with an Authority directed timetable. HT added that cross-Code coordination will be required to ensure that all Codes are working towards the same timeframes. HT added that it is proposed that only changes critical for MHHS go-live are included within the Change Proposal, with a route for the other changes to be confirmed closer to the time.

HT presented the proposed timeline of I0241 to attendees. HT added that the backstop Authority decision date will be early September, but it is hoped that the Change Proposal can be pushed through earlier.

Next Steps:

HT advised that documentation for the Scope items will be made available on the I0241 portal page. HT added that the Change Proposal Plan for I0241 will also be published and presented to REC Change Panel in the near future.

HT advised that the Code Manager will be setting up future Change Issue Group meetings with a specific start time for I0241.

12. AOB

The Chair invited attendees to provide AOB.

LC informed attendees that the Code Manager is looking to set up some meetings with DNOs to have initial discussions regarding I0228 – ECOES API for Export MPAN Creation at Scale. LC advised that invitations will be going out to DNOs very shortly.