RETAIL ENERGY CODE

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01	Initial Assessment Report
02	Preliminary Change Report
03	Final Change Report

INITIAL ASSESSMENT REPORT

R0094 – CLARIFY OBLIGATIONS ON GAS METER EXCHANGES THAT OCCUR CLOSE TO SWITCH

DOCUMENT VERSION	V1.0
DATE ISSUED	22/09/2023
DOCUMENT APPROVAL STATUS	NOT YET APPROVED

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL	**CHANGE PATH**	SELF-GOVERNANCE
PRIORITY STATUS	MEDIUM	**URGENCY**	STANDARD

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	29/03/2024

LEAD CHANGE ANALYST



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CHANGE OVERVIEW

When a Meter Equipment Manager (MEM) carries out work on the Gas meter concurrently with a switch, the MEM may be de-appointed before it sends updated meter information to the Central Data Service Provider (CDSP). This results in the gaining Registered Supplier not having accurate meter information, which can lead to a poor Consumer experience.

	High Impact: Gas Consumers
	Medium Impact: Registered Gas Suppliers MEMs
	Low Impact: CDSP

1 BACKGROUND

When a MEM carries out a change of Gas Metering Asset, they are required to update both the Registered Gas Supplier and the CDSP with the outcome of the work. This is done via the ONJOB Market Message and should be provided within 48 hours of completion of the work. This requirement is set out in Schedule 14 – Metering Operations under paragraphs 8.5.9 and 8.5.10. When this update is not made it results in the Registered Gas Suppliers holding the wrong asset information which in turn leads to potential billing, settlement and compliance issues for the Registered Gas Suppliers and a poor experience for the customer.

Failure to send ONJOB Market Messages can be compounded when the Metering Asset work happens concurrently with a Switch. During a Switch, the MEM will be de-appointed by the losing Registered Gas Supplier. The losing MEM has 2 Working Days (WDs) to acknowledge the de-appointment request from the losing Registered Gas Supplier. In instances where the MEM is de-appointed during or after Metering Asset work is undertaken, but before ONJOB Market Messages are sent, they may never be sent by the de-appointed MEM.

This change seeks to make it clearer that the MEM's are obliged to send ONJOB Market Messages to the outgoing Registered Gas Supplier and the CDSP regardless of the de-appointment. Whilst the Code Manager believes that the existing provisions in Schedule 14 – Metering Operations provide that the MEM must send ONJOBs regardless of appointment status, this change seeks to make the requirement explicit. This will help the gaining Registered Gas Supplier ensure that they can establish the Consumer's account with accurate meter technical details, preventing problems with billing, settlement or switching.

2 PROBLEM STATEMENT

When Metering Asset work is carried out concurrently with a Switch, details of the work undertaken may not be sent to industry by the MEM, resulting in inaccurate and out of date Metering Asset data being passed to the gaining Registered Gas Supplier.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As a Consumer, I want my Supplier to have accurate information about my meter, so that I do not experience billing problems following a Switch.
MARKET PARTICIPANT USER STORIES	
M1	As a MEM, I want to clearly understand my obligations relating to data transfer during a Switch, so that records of work I carry out are accurately recorded.
M2	As a Registered Supplier, I want metering data on my portfolio of Registrable Measurement Points to be accurate, so that Consumers do not experience billing problems or have a negative switch experience.
M3	As the CDSP, I want Change of Metering Asset data communicated with me to be timely and accurate, so that I am better able to fulfil my role and support REC Parties.

4 IMPACTS

CONSUMERS
Gas Consumers

REC SERVICE PROVIDERS
CDSP

REC DOCUMENTS / PRODUCTS
Schedule 14 – Metering Operations

REC PARTIES AND SERVICE USERS
Gas Suppliers
MEMs

MEMs will be impacted as they are the originator of outbound ONJOB Market Messages following Metering Asset work.

Any change to the process or obligations will impact them. Registered Gas Suppliers will also be impacted as they are responsible for sending Market Messages in one of the two pathways by which the CDSP may be updated.

The CDSP is likely to be impacted as any change which results in additional ONJOB Market Messages being sent may increase Market Message volumes.

5 CROSS CODE IMPACTS

No cross-code impacts have been identified.

6 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	SELF-GOVERNANCE

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

This change will follow a Self-Governance Change Path. The Responsible Committee for making self-governance decisions on changes to Schedule 14 – Metering Operations is the Metering Expert Panel (MEP) as set out in the REC Baseline Statement.

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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	1	27	27
	Retail Markets Impact	Retail Risk(s)	2	17	33
	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		1	17	8
	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	0	10	0
				Overall Priority Score (rounded)	114

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

Notes:
Direct consumer impact to be quantified (not all customers, on a MEX close to CoS - numbers TBC)
Linked to retail risks 7.3 and 7.4

Priority Status	MEDIUM
Change Proposal Type	STANDARD

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

This Change Proposal has a medium priority status based on a score of 114.

- Retail Risk has been given a score of two, indicating a moderate impact. If gaining Registered Gas Suppliers do not get accurate Meter Asset information, they will be unable to accurately bill the Consumer. This threatens REC Parties ability to meet Retail Risk 5: “Consumers do not receive an accurate first and final bill, which leads to high consumer dissatisfaction” and will also impact Retail Risk 7 – “Inaccurate meter point master data results in errors that impact consumers”.
- Operational Effectiveness & Efficiency for REC Parties & Service Providers has been given a score of two, indicating a moderate impact. When gaining Registered Suppliers do not have accurate Meter Asset information, resolving the resulting issues represents time lost and operational inefficiency. A solution will eliminate these inefficiencies.
- Complexity/effort/duration have been given a score of two, indicating a moderate impact. Any solution to this change will require re-clarification of expectations between multiple REC Parties & Service Providers. We will also explore options that will enable the Incoming Registered Gas Supplier to have confidence in the meter Asset details provided to them where the Switch occurs close to a Meter Exchange, which may include things that may come out of Impact Assessments.

8 SUMMARY OF CHANGE PROPOSAL PLAN

This change seeks to clarify and make explicit existing obligations for MEMs and Suppliers to communicate with the CDSP via Market Messages following a Change of Metering Assets when occurring concurrent with a Switch. It will also explore solution options that will allow the Gaining Supplier to have confidence that the metering information provided to them is an accurate reflection of the metering asset at the Metering Point. Whilst we have outlined the major milestones in this change and brought them within scope, we anticipate that solution development and impact analysis may yield outcomes that may require us to re-evaluate the scope of this change.

	FROM	TO
SOLUTION ANALYSIS AND DEVELOPMENT	03/10/2023	10/11/2023
SERVICE PROVIDER IMPACT ASSESSMENT	20/11/2023	22/02/2024
PARTY IMPACT ASSESSMENT	01/03/2024	22/03/2024
PRELIMINARY CHANGE REPORT ISSUED	29/03/2024	29/03/2024
RESPONSIBLE COMMITTEE REVIEW	10/04/2024	10/04/2024
CONSULTATION	12/04/2024	03/05/2024
FINAL CHANGE REPORT ISSUED	31/05/2024	31/05/2024
RESPONSIBLE COMMITTEE DECISION	12/06/2024	12/06/2024
APPEAL WINDOW CLOSURE	26/06/2024	26/06/2024

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9 GLOSSARY

TERM	DEFINITION
Appointed	means, in respect of a Supplier Agent and for a particular RMP, that the Supplier Agent is recorded against that RMP under this Code (or the BSC or UNC, as applicable); or, in respect of a period of time, that the Supplier Agent is or was so recorded during that period. "Appoint" and "Appointment" shall be interpreted accordingly.
CDSP	means the 'Central Data Service Provider' appointed by Gas Transporters pursuant to standard special condition A15 (Central Data Service Provider) of the Gas Transporter Licences.
Change of Metering Assets	means the installation, removal and/or exchange of a Metering Asset for an RMP.
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.
MEM	means, as applicable, either: (a) for electricity, the 'Meter Operator Agent' (as defined in the BSC) Appointed by an Electricity Supplier; or (b) for gas, the 'Meter Asset Manager' (as defined in the UNC) Appointed by the Gas Supplier
Metering Asset	shall have the same meaning as Metering Equipment
Metering Equipment	means: (a) in relation to gas, all the components of a meter installation and ancillary equipment, as defined in IGEM/G/1 edition 2; or (b) in relation to electricity, means the equipment associated with a particular meter, including the meter itself and any related Current Transformer (CT) and/or Voltage Transformer (VT), communication and/or control equipment, as may be further defined in the BSC.
Registered Supplier	means, in respect of an RMP and at any time, the Energy Supplier recorded against that RMP in the Central Switching Service at that time with an Active or Secured Inactive Registration Status (or, in respect of a period of time, the Energy Supplier that had, has or will have an Active or Secured Inactive Registration Status in respect of that RMP during that period).
Registrable Measurement Point (RMP)	means a Supply Meter Point or Metering Point identified in the Central Switching Service.
Retail Risk	means a risk that retail energy consumer outcomes and the effectiveness of the retail market are measurably and significantly degraded by a failure by a REC Service User or REC Service Provider to meet the objectives, standards and core processes under this Code.
Switch	means a change to the Registered Supplier for an RMP.