RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	Final Recommendation

CHANGE REPORT

I0312 – REVIEW OF EXPORT METERS WORKS ARRANGEMENTS

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

RESPONSIBLE COMMITTEE	Metering Expert Panel	CHANGE PATH	Self-Governance
PRIORITY STATUS	High	URGENCY	Standard
IMPACTED STAKEHOLDERS	Energy Suppliers, Metering Equipment Managers, Safe Isolation Providers		

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

There is a lack of distinction within REC Schedule 14 – Metering Operations between activities for Import and Export Metering, and how to manage work arrangements where there is a shared Metering Asset between Import and Export Suppliers.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the REC Change Panel:

- **APPROVE** the Proposal Plan, including the Responsible Sub-Committee, Change Path, Priority Status, Urgency and timetable.

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BACKGROUND

1 SUMMARY

The REC Schedule 14 – Metering Operations has limited distinction between the activities for Import and Export Metering. These provisions were not specifically developed to support a market with high volumes of small-scale microgeneration with shared Metering Assets for Import and Export. Due to this, there is no recognition of how certain activities should be managed where there is a shared Metering Asset with separate Import and Export Suppliers. For example, whether there are specific services that should only be requested by one of these Suppliers. Through the R0207 - Import / Export MOA Charging Clarification working group, Parties have highlighted the need to review these arrangements to provide clarity on how metering works should be managed and provide clarity for Consumers/generators, Suppliers and Meter Operator Agents (MOAs).

Industry Parties do not have a consistent approach to managing meter works or investigating meter faults/issues where Import/Export Metering is present. In these scenarios, there may be separate Import and Export Suppliers, particularly as not all Suppliers are obligated to provide Export tariffs via the Smart Export Guarantee (SEG). Different Suppliers have different views on how this should be managed. Some consider that meter works should only be requested by the Import Supplier. Others consider that the Export Supplier must have a way to investigate and resolve meter faults, particularly where the fault has been reported by the generator to the Export Supplier. With the proliferation of small-scale metered Export supplies, which is expected to increase as Deemed Feed-in Tariff (FIT) generators are migrated to metered Export as part of MHHS Migration, this issue is becoming more prevalent and an industry solution is required.

This Issue seeks to review the arrangements codified in REC Schedule 14 – Metering Operations, with a view to amend the text and provide a clear approach on how meter works should be managed between Import and Export Suppliers where there is a single Import or Export meter in place. The outcome of this review may also include amendments to other arrangements in the REC related to Export meter works to ensure the processes, systems, interfaces and governance for requesting meter works and investigating meter faults for Import and Export Suppliers are clear.

2 PROBLEM STATEMENT

There is a lack of distinction within REC Schedule 14 – Metering Operations between activities for Import and Export Metering, and how to manage work arrangements where is a shared Metering Asset between Import and Export Suppliers.

3 IMPACTS

CONSUMERS
All Consumers

RECCO / REC CODE MANAGER
REC Performance Assurance

REC SERVICE PROVIDERS
TBD

REC PARTIES AND SERVICE USERS
Energy Suppliers
Metering Equipment Managers
Safe Isolation Providers

REC DOCUMENTS / PRODUCTS
Schedule 1 – Interpretations and Definitions
Schedule 14 – Metering Operations
Data Item Catalogue, Market Message Catalogue

MHHS
Given this Issue will consider amendments to Schedule 14 - Metering Operations it is expected a range of market scenarios will be impacted. A series of market scenarios anticipated to be impacted have been outlined below. Following development of the solution this assessment will need to be reviewed.

4 CROSS-CODE IMPACTS

It is not expected that changes to the BSC will be required but it is possible the BSC may have an interest in this review. BSCCo will be engaged with during solution development.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**13 Feb-26**	**30 Nov-26**
	Code Manager Initial Assessment	March	March
	Solution Analysis	March	April
	Solution Development	May	November

This Proposal Plan submitted to Change Panel only covers the solution analysis and solution development activities as the Code Manager plans to fully assess and scope the size of the problem being addressed under I0312. As part of solution development activities, a working group will be stood up to review Schedule 14 in detail ahead of a Party impact assessment (if needed) and progressing to a Change Proposal.

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6 STAKEHOLDER ENGAGEMENT

Throughout the progression of this Issue, the Code Manager and Proposer will engage with industry stakeholders through the I0312 Working Group. This is to gather input from REC Parties on use cases of Export/Import meter works to be considered as part of the review of Schedule 14. The Working Group's output will be integral to the Solution Development stage and should ensure that a thorough and effective review is conducted under I0312.

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	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	3	7	20
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		3	9	28
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	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)	163

Priority Status	HIGH
Change Proposal Type	STANDARD

The Code Manager has designated I0312 a priority status of High, with a weighted score of 163. This is due to the direct impact borne by Consumers where there is difficulty in requesting meter works/meter investigations if the process for the Supplier taking this forward is unclear. This can result in delays to either the acceptance and completion of works or Supplier/industry records being updated through the correct data flows being shared with both Suppliers. This Issue will improve the operational effectiveness and efficiency of the REC by providing clearer legal drafting and reducing ambiguity in the obligations of Energy Suppliers, MEMs and, potentially, SIPs in conducting meter works.

8 APPENDIX

CHANGE PROPOSAL	Link
RELATED CHANGE(S)	R0207 - Import / Export MOA Charging Clarification

9 GLOSSARY

TERM	DEFINITION
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Export	means electricity which is exported from a Premises.
Export Metering Point	means a Metering Point which identifies exports from a Location.
Import	means electricity which is imported to a Premises.
Metering Asset	shall have the same meaning as Metering Equipment.
Meter Operator Agent (MOA)	means a Party which has Qualified in that role under the Qualification and Maintenance Schedule. Where used in respect of a particular Metering Point, it means the MOA Appointed by an Electricity Supplier in accordance with the Metering Operations Schedule. The MOA is accountable for the installation, replacement, repair and maintenance of electricity Metering Equipment (either itself or by an EMO), and the MOA must also therefore be Accredited under the Metering Accreditation Schedule.
Safe Isolation Provider (SIP)	means a Meter Operator Agent or Electricity Metering Operative which has been (and remains) accepted as a Safe Isolation Provider in accordance with paragraph 9 of the Metering Accreditation Schedule.