RETAIL ENERGY CODE

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

CHANGE REPORT

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

CHANGE REPORT	FINAL
DOCUMENT VERSION	1.0
ISSUED DATE	05/06/2024
DOCUMENT APPROVAL STATUS	PRE-VOTE

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

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	25/04/2024

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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: Gas Suppliers Metering Equipment Managers Gas Shippers
	Low Impact: Central Data Service Provider

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0094 is **APPROVED** for implementation on 08 November 2024.

RETAIL ENERGY CODE

CONTENTS

BACKGROUND		
1.	Summary	**3**
2.	Problem Statement	**3**
3.	User Stories	**3**
PROPOSAL		
4.	Summary of Analysis Undertaken	**4**
5.	Proposed Solution	**4**
6.	Draft Legal Text	**10**
7.	Summary of Impact Assessment Activity	**11**
8.	Delivery Against Change Proposal Plan	**14**
9.	Key Risks, Assumptions, Issues and Dependencies	**14**
10.	Proposed Implementation Date and Approach	**14**
11.	Summary of Consultation Responses	**15**
12.	Summary of Amendments Made Following Consultation	**16**
13.	Business Case Assessment	**17**
14.	Case for Change	**18**
15.	Code Manager's Recommendation	**18**
16.	Appendix	**18**
17.	Glossary	**1919**

BACKGROUND

1 SUMMARY

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 outcome.

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 MEMs 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.

RETAIL ENERGY CODE

PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

During solution development and analysis, we have identified three scenarios that all result in the same issue central to this change; the CDSP not receiving accurate Metering Asset information where Metering Asset works are carried out close to a Switch. This section will describe the scenarios that the Code Manager has identified and will then go onto detail how the legal text changes will resolve each specific scenario, by exploring the draft legal text changes.

4.1 CHANGE SCENARIOS

4.1.1 SCENARIO 1

The losing Supplier instructs a Metering Asset job prior to the Switch and it is conducted in the losing Supplier's ownership period. However, the Market Messages are not sent by the MEM and / or losing Supplier prior to the switch. As a result, the gaining Supplier (and Shipper) and the CDSP are not updated with the Metering Asset's new details.

4.1.2 SCENARIO 2

The losing Supplier instructs their MEM to conduct a Change of Metering Asset, however, due to a concurrent switch, the work takes place following the switch, and is therefore within the gaining Supplier's Registration period. In this scenario, where the losing Supplier then attempts to update CDSP with the details of the Change of Metering Asset, this will be rejected as the work occurred outside the losing Supplier's Registration period. The gaining Supplier will receive a Connections & Disconnections (C&D) Store notice, alerting them that details of the Metering Asset they have acquired are likely to be inaccurate.

4.1.3 SCENARIO 3

The gaining Supplier instructs their MEM to conduct a Change of Metering Asset to coincide with the switch, to ensure that work is carried out on D+0, for example. However, the MEM conducts the work prior to the switch, and as a result, the Change of Metering Asset occurs during the losing Supplier's ownership period, and the losing MEM's appointment period. Where the work is carried out on or before D-2, the CDSP cannot accept notification of the work as it was conducted outside of the gaining Supplier's acceptable appointment period.

5 PROPOSED SOLUTION

The Code Manager has is proposing a series of changes to Schedule 14 – Metering Operations. These are broken down as follows:

5.1.1 SECTION 6.4 - METERING ASSET INSTALLATION (GAS MAM)

The Code Manager is proposing the following text to be added to Section 6.4 - Metering Asset Installation (Gas MAM). Please note that selected previous steps have been included to provide context to the text for 6.4.4. Only the text in red is to be added.

Ref	When	Action	From	To	Interface	Means
6.4.1	If required.	Request Metering Asset installation.	Consumer	Gas Supplier[4]	Unlikely to be electronic	Not defined
6.4.2	Following 6.4.1.	Request Metering Asset installation.	Gas Supplier	MAM	ORJOB	Email, IX, DTN
6.4.3	Within 2WDs of 6.4.2.	Respond to Metering Asset installation request.	MAM	Gas Supplier	RRJOB	Email, IX, DTN
6.4.4	Following 6.4.2.	Request Metering Asset installation. MAMs shall only proceed with the Metering Asset Installation if they reasonably believe they will have a valid appointment status on the date of the Metering Asset Installation. Where a MAM conducts a Metering Asset Installation following instruction by a Supplier, the MAM should take all reasonable steps to report the details of the Metering Asset Installation onward as per their obligations in Section 6, regardless of their appointment status upon completion of the Metering Asset Installation.	MAM	Meter Worker / AMI	Information contained within ORJOB	Not defined
6.4.7	At the time and date specified within the request in 6.4.4.	Carry out Metering Asset installation[7].	Meter Worker / AMI		Internal Process	N/A

5.1.2 SECTION 7.5 – METERING ASSET REMOVAL

The Code Manager is proposing the following legal text amendment to be added to Section 7.5 - Metering Asset Removal (Gas MAM). Please note that selected previous steps have been included to provide context to the amendment for 7.5.4. Only the text in red is to be added.

Ref	When	Action	From	To	Interface	Means
7.5.1	If required.	Request Metering Asset removal.	Consumer	Gas Supplier[29]	Unlikely to be	Not defined

Ref	When	Action	From	To	Interface	Means
					electronic	
7.5.2	Following 7.5.1.	Request Metering Asset removal.	Gas Supplier	MEM	ORJOB	Email, IX, DTN
7.5.4	Following 7.5.2.	Request Metering Asset removal. MAMs shall only proceed with the Metering Asset Removal if they reasonably believe they will have a valid appointment status on the date of the Metering Asset Removal. Where a MAM conducts a Metering Asset Removal following instruction by a Supplier, the MAM should take all reasonable steps to report the details of the Metering Asset Removal onward as per their obligations in Section 7, regardless of their appointment status upon completion of the Metering Asset Removal.	MAM	Meter Worker / AMI	Information contained within ORJOB	Not defined
7.5.7	At the time and date specified within the request in 7.5.4.	Carry out Metering Asset removal.	Meter Worker / AMI		Internal Process	N/A

5.1.3 SECTION 8.5 - METERING ASSET EXCHANGE / REPOSITION / RECONFIGURE (GAS MAM)

The Code Manager is proposing the following legal text amendment to be added to Section 8.5 - Metering Asset Exchange / Reposition / Reconfigure (Gas MAM). Please note that selected previous steps have been included to provide context to the amendment for 8.5.4. Only the text in red is to be added.

Ref	When	Action	From	To	Interface	Means
8.5.1	If required.	Request Metering Asset exchange.	Consumer	Gas Supplier[29]	Unlikely to be electronic	Not defined
8.5.2	Following	Request Metering Asset	Gas	MAM	ORJOB	Email, IX, DTN

Ref	When	Action	From	To	Interface	Means
	8.5.1.	exchange.	Supplier			
8.5.4	Following 8.5.2.	Request Metering Asset exchange. MAMs shall only proceed with the Metering Asset Exchange if they reasonably believe they will have a valid appointment status on the date of the Metering Asset Exchange. Where a MAM conducts a Metering Asset Exchange following instruction by a Supplier, the MAM should take all reasonable steps to report the details of the Metering Asset Exchange onward as per their obligations in Section 8, regardless of their appointment status upon completion of the Metering Asset Exchange.	MAM	Meter Worker / AMI	Information contained within ORJOB	Not defined
8.5.7	At the time and date specified within the request in 8.5.4.	Carry out Metering Asset exchange.	Meter Worker / AMI		Internal Process	N/A

5.1.4 SECTION 9.5 - SWITCH WITH CONCURRENT CHANGE OF MEM (GAS MAM)

The Code Manager is proposing the following legal text amendment to be added to Section 9.5 – Switch with Concurrent Change of MEM (Gas MEM). Please note that selected previous steps have been included to provide context to the amendment for 8.5.4. Only the text in red is to be added.

Ref	When	Action	From	To	Interface	Means
9.5.1	At any time.	Request new Gas Supplier.	Consumer	Gaining Supplier	Not defined	Other
9.5.2	Following 9.5.1.	Submit Switch Request.	Gaining Supplier	CSS Provider	As defined in the Registration Services Schedule	CSS API

Ref	When	Action	From	To	Interface	Means
9.5.3	Following Switch Request validation	Accept Switch Request. Where the Switch Request is rejected, the process will be terminated and a new Switch Request will be required.	CSS Provider	Gaining Supplier Losing Supplier CDSP via the GRDA Other recipients as defined in the Registration Services Schedule	As defined in the Registration Services Schedule	CSS API
9.5.10	At any time following 9.5.3[46].	Request agent de-appointment.	Losing Supplier	Losing MAM	ONAGE including details of Gaining Supplier	Email, IX, DTN
9.5.11	Within 2WDs of 9.5.10.	Accept agent de-appointment.	Losing MAM	Losing Supplier	RNAGE	Email, IX, DTN
9.5.12	Following 9.5.11, if ONAGE DI40174 Transaction Type Reason Code = COS, and where ONAGE DI40088 Effective To Date is in the past. Otherwise, move to 9.5.18.	Confirm if Metering Asset Exchange /Reposition /Reconfigure has been conducted and/or not recorded following effective de-appointment date found within the ONAGE. If at any time a de-appointed MAM realises it has carried out a Metering Asset Exchange /Reposition /Reconfigure, Metering Asset Removal, or Metering Asset Installation, that is not represented in Market Messages already issued to the Gaining MAM on de-appointment, it should ensure that all updated Metering Asset information & supplementary	Losing MAM	-	Internal	N/A

Ref	When	Action	From	To	Interface	Means
		information are provided to the Gaining MAM. Where the exchange of Metering Asset information reveals that Switch Meter Reading used by the Gaining Supplier and Losing Supplier for billing and/or settlement are incorrect, the suppliers shall resolve this read issue via the Switch Meter Reading Problems process as per Schedule 30 - Resolution of Consumer-Facing Switching and Billing Problems.				
9.5.13	Within 48 hours of 9.5.12 where the conditions are met.	Communicate details of Metering Asset Exchange/Reposition/Reconfigure	Losing MAM	Gaining MAM	ONDET	Email, IX, DTN
9.5.14	Within 48 hours of 9.5.13	Respond to Metering Asset information.	Gaining MAM	Losing MAM	RNDET	Email, IX, DTN
9.5.15	Within 48 hours of 9.5.13	Notification of Metering Asset Exchange/Reposition/Reconfigure	Gaining MAM	Gaining Supplier	ONJOB	Email, IX, DTN
9.5.16	Within 48 hours of 9.5.13	Notification of Metering Asset Exchange/Reposition/Reconfigure	Losing MAM	Losing Supplier	ONJOB	Email, IX, DTN
9.5.17	Following 9.5.13, 9.5.15 or 9.5.16	As per Metering Asset Exchange obligations in Paragraph 8.5, Metering Asset Removal obligations in Paragraph 7.5, or Metering Asset Installation obligations in Paragraph 6.4, as appropriate.	MAM Gaining Supplier Losing Supplier	CDSP Gaining Shipper Losing Shipper	ONJOB	-

6 DRAFT LEGAL TEXT

The draft legal text can be found here. These legal text amendments will resolve the three scenarios identified above, and therefore resolve the issue identified in R0094's problem statement. Below, the legal text changes will be addresses one by one, and an explanation will be provided for the Code Manager's rationale behind them.

The draft legal text has since been updated following the closure of the Consultation. These changes, and the rationale behind them, are captured in Sections 11 and 12 of this document,

6.1.1 SECTION 6.4, SECTION 7.5 & SECTION 8.5 AMENDMENTS

These amendments have been included for two reasons. Firstly, they represent a general catchall statement that work on Metering Assets should not be conducted outside of a MEM's appointment period. All the scenarios identified as part of the Code Manager's solution analysis demonstrate the underlying issue at the heart of R0094. These are caused by a MEM conducting work very close to a different MEM's appointment period. Also. the de-appointment process overlapped the change of supply process, leaving insufficient time for Market Messages to process and complete. This statement therefore represents the Code Manager's intention that wherever possible these, close to or out-of-appointment, Metering Asset jobs should be avoided.

The Code Manager has included the same legal text amendment under both Section 6.4 – Metering Asset Installation, Section 7.5 – Metering Asset Removal & 8.5 – Metering Asset Exchange / Reposition / Reconfigure. Whilst the majority of the R0094 incidents occurring are a result of a Metering Asset Exchange, we cannot rule out that these incidents also occur during a Metering Asset Installation or Metering Asset Removal.

The second reason behind the addition of this legal text is to directly address Scenario 3, outlined above. Whilst the Code Manager has proposed a new obligation to address Scenarios 1 & 2 (to be detailed below), we did not feel that this was warranted for Scenario 3. We feel that Scenario 3 is not as prevalent as the other scenarios, and as a result, we did not feel that a new obligation to address it would be appropriate. Instead, the legal text amendment would be sufficient to provide Suppliers and MEMs with clarity that work should not be instructed before either Party is appointed.

6.1.2 SECTION 9.5 – NEW OBLIGATION

The Code Manager has proposed a new obligation to ensure that details of a Change of Metering Asset are communicated onwards to Suppliers, Shippers and the CDSP as appropriate. This new obligation has been inserted into Section 9.5 – Switch with Concurrent Change of MEM (Gas MEM). We have not included the Change of MEM (Gas MEM) without a Switch as the Supplier remains the same and will have details of any missing updates to escalate with their MEMs. The Code Manager has inserted the new steps below existing steps 9.5.10 and 9.5.11, as we felt that linking these new obligations to the MEM de-appointment process was essential, as de-appointment is a fundamental issue within the context of this Change. The new obligation is as follows:

- **9.5.12** – We have linked new obligation to two specific triggers: The effective de-appointment date found within the ONAGE, and the de-appointment reason found within the ONAGE to address the issues identified in R0094.
- **9.5.13 & 9.5.14** – Where a MEM has identified that a Change of Metering Asset has occurred outside their appointment period following the checks conducted as part of 9.5.12, the losing MEM will communicate with the gaining MEM via an ONDET (responded to via the RNDET). This ensure that both parties are now aware of the Metering Asset details.
- **9.5.15 & 9.5.16** – By introducing an obligation for both the gaining and losing MEM to communicate Metering Asset details onto the relevant Supplier, the Code Manager has ensured that all Parties are now able to communicate onward to CDSP. As Scenario 1 and 2 involve a Change of Metering Asset conducted in the Losing and Gaining MEMs' appointment periods respectively, by ensuring that both the Losing and Gaining Supplier both have access to the correct Metering Asset details, the opportunity to update CDSP is enhanced and clarified.
- **9.5.17** – We have linked this new obligation back to existing steps to inform relevant parties of a Change of Metering Asset, as described in Section 8.5.

6.1.3 SECTION 9.5.12 – SUPPLEMENTARY TEXT

The Code Manager has included two paragraphs within 9.5.12 to support the proposed obligation, both associated with the "trigger" found in 9.5.12.

- **Paragraph 2 ("If at any time…")** – We have included this to let Parties know that if at any point during the Switch Process they discover a Change of Metering Asset has been conducted outside of that MEM's appointment period, then they can follow the new obligation to resolve it.
- **Paragraph 3 ("Where the exchange of…")** – This amendment is to encourage Parties to use the Switch Meter Read Problems process (as per Schedule 30) to address incorrect readings, should they arise from the R0094 issue. We are keen to ensure that even, REC Parties feel supported in knowing how to resolve any issues with the Switch Meter Read.

7 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

7.1 SERVICE PROVIDER IMPACT ASSESSMENTS

The Code Manager conducted a preliminary service provider impact assessment with the CDSP between 20 November 23 and 11 December 23. The Code Manager should note that the CDSP completed the impact assessment based on a solution which has since undergone further iteration. As such, this section reflects CDSP reaction at the time; they have since made further comments during Consultation, which can be found in Section 11.

Central Data Service Provider	• CDSP confirmed that they do not expect any system changes as a result of the proposed solution. • The CDSP confirmed that they believed that the Code Manager captured all solution requirements. • The CDSP made an assumption that no changes to the ONJOB or ONUPD Market Messages would change as a result of the proposed solution. The Code Manager can confirm that this is indeed the case. • The CDSP were asked to provide feedback specifically on how the solution would resolve scenario two and confirm that they expect that it will resolve it.

The CDSP are continuing to engage informally with the Code Manager on this Change and have provided their views on the solution as it has been iterated upon.

7.2 REC PARTY IMPACT ASSESSMENTS

The Code Manager published a REC Party impact assessment on 27 March 24, and it concluded on 19 April 24. The Code Manager received seven responses, from five Suppliers and two MEMs. The Code Manager asked respondents for their view on the proposed solution, expected resource costs associated with implementation, implementation lead time requirements, and for views on any other elements of the Change not captured by the Code Manager.

ENERGY SUPPLIERS	• Of the five Suppliers who responded, two of them (ENGIE & SSE) supported the Code Manager's assertion that the proposed solution constitutes a positive case for change, and agreed with our assessment that the proposed solution will resolve the problem statement.
	  ○ Regarding operational costs associated with implementation, ENGIE did not foresee any implementation costs, and SSE foresaw a small amount (which was not quantified) but anticipated that it would be outweighed by the benefits likely to be accrued by the proposed solution.
	• Of the remaining three Suppliers (OVO, SEFE & EDF), each identified an issue which the Code Manager will address below:
	  ○ OVO: This respondent (who is also the Proposer of the change) has suggested several changes to the wording of proposed new Paragraph 9.5.12. Several of the points raised have been addressed by legal text revisions suggested by SEFE (see below). The respondent did question the wording of new Paragraph 9.5.12, and the Code Manager will address the wording of this Paragraph during Consultation.

	○ SEFE: This respondent identified that the Code Manager had not given suitable consideration to the impact that the proposed solution will have on non-domestic MEMs who conduct work on complex Metering Assets. They suggested a wording amendment to the proposed amendments for Sections 6.4 and 8.5, that they believe will sufficiently resolve the issue. The Code Manager agreed and has since adopted this amendment. ○ EDF: The respondent raised several concerns about the new obligation proposed by the Code Manager, and how it will impact on operational processes during a Change of Metering Asset. The Code Manager has since met with the respondent, discussed the solution, and the respondent has confirmed that their concerns have been addressed in the latest iteration of the solution.
METERING EQUIPMENT MANAGERS	• Both MEMs who responded supported the proposed solution and agreed that it would constitute a positive case for change. • Of the two MEMs, only SMS provided a view on implementation and operational considerations; BUUK did not respond to these questions. ○ SMS confirmed that they would expect minimal operational impact as a result of implementing the proposed solution as their systems already work in a way which aligns with the goals of the R0094 solution. ○ SMS confirmed that they did not expect any conflict between the proposed solution and existing Connections & Disconnections Store obligations. • BUUK drew attention to the Code Manager's assessment that there is some overlap between R0094 and R0064. They queried why the Code Manager flagged R0064, when that change largely constitutes changes to Electricity regulation. ○ The Code Manager confirmed that the R0064 solution involves a change to Schedule 14 – Metering Operations, in which gas MEMs are to be re-named MAMs. As such, the Code Manager is confident that this link was identified correctly, and the R0094 proposed legal text changes have been drafted with R0064 in mind.

8 DELIVERY AGAINST CHANGE PROPOSAL PLAN

The Change is proceeding according to V2.0 of the Change Proposal Plan. The Code Manager revised the initial plan on 01 March 24, and this revised plan was approved by the REC Change Panel.

The Change Proposal Plan can be found here.

9 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

9.1 ASSUMPTIONS AND DEPENDENCIES

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
1	R0105 is a change that is exploring a reduction in the 2WD SLA for MEMs to respond to the ONAGE Market Message.	The Code Manager has not formally identified a direct dependency between these changes. Rather, they share an overlap as both relate to processes surrounding the de-appointment of MEMs. Instead, the Code Manager would encourage respondents simply to keep R0105 in mind whilst considering their responses.	Confirmed – No Impact

10 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	08 November 2024

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

The Code Manager proposes to include this Change in the November 2024 release. This will provide sufficient lead time following approval to allow REC Parties to accommodate the implementation of the proposed solution. Whilst the Code Manager did initially propose to include this Change in the February 2025 release, respondents to the Consultation reported that a November 2024 release would be preferable, and so the Code Manager has changed the proposed release date to accommodate this feedback.

11 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 10 May 2024 to obtain views on the Preliminary Change report (found here). In total six responses were received from five Suppliers and one MEM. The responses have been consolidated and comments provided by the Code Manager. This can be found here.

The key themes from these responses have been summarised and set out below.

11.1 SUMMARY OF RESPONSES

11.1.1 COMMENTS ON THE SOLUTION AND LEGAL TEXT

Four of the respondents support the proposed solution and agree with the Code Manager's assessment that it will resolve the problem statement. One of these four respondents, SSE, did raise concerns about the specific wording of proposed new process paragraph 9.5.12, following invitation specifically from the Code Manager to comment on this wording. They suggested that it might be better to move the "trigger" for the new process steps in 9.5.12 from the "When" column to the "Action" column. However, on this issue, the Code Manager does not agree with this assessment, as we wish it to be clear that these new steps are specific to the R0094 issue, and as such, feel this is best captured under "When" for greater clarity for REC Parties.

As stated above, only four of the six respondents agreed fully with the Code Manager's proposed solution and legal text. One of these respondents was the CDSP. They raised two main concerns that they did not feel were fully addressed within the legal text; that MAMs should only conduct work if they are appointed on the date of the work, and that the MAM who conducts work must be the one to notify it. The Code Manager has since spoken with the CDSP and have addressed these concerns. The first concern is covered within the first additional paragraph within Sections 6,7 and 8, and the second concern is covered by the new second paragraph within these Sections.

The other respondent did not supportthe proposed solution and wished to remain anonymous. They raised concerns about the risk of duplication of Market Messages posed by proposed solution and suggested alternative drafting. Whilst the Code Manager does appreciate that there is a risk of process duplication, our reasoning behind the new process steps is that if the existing ONDET/ORDET mechanism were sufficient to resolve this issue (as identified by the respondent), then additional process steps would not be required. Regarding the alternative solution proposed by the respondent, the Code Manager does not plan to move forward with it over the existing solution. This is because the alternative solution that has been proposed is likely to result in additional complexity and could result in a greater risk of delay in resolving R0094 incidents, relative to the original solution.

11.1.2 BENEFITS RELATIVE TO IMPLEMENTATION AND OPERATIONAL COSTS

Apart from the response from the CDSP and the anonymous Supplier, all respondents were broadly supportive of the proposal solution as they felt that the R0094 issue does represent a genuine issue within the REC that needs to be resolved, and that the proposed solution will address this problem.

11.1.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

All respondents bar the anonymous Supplier agreed that there is a positive case for Change, and agreed with the Code Manager's assertion that the proposed solution will benefit market participants by resolving issues relating to Metering Asset changes close to a Switch.

11.1.4 IMPLEMENTATION APPROACH AND DATE

The Code Manager asked respondents if they would be comfortable with a November 2024 release, as opposed to a February 2025 release, as initially planned. The Code Manager anticipated that REC Parties may respond favourably to moving the implementation away from planned MHHS programme activities in Q1 and Q2 of 2025. Four of the six respondents agreed with the Code Manager's approach and were in favour of the earlier implementation date. One respondent (who wished to remain anonymous) was against the November 2024 implementation, but on balance against the other respondents, the Code Manager is not able to accommodate this. The final respondent was the CDSP, who did not have a strong view on the implementation date as they are not required to modify their systems in any way to accommodate the proposed solution.

12 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

DOCUMENT	SECTION	AMENDMENT	REASON
Schedule 14	6/7/8	The explanatory footnote has been moved from paragraph: - 6.4.7 to 6.4.4 - 7.5.7 to 7.5.4 - 8.5.7 to 8.5.4	During presentation of the Preliminary Change Report to the REC Metering Expert Panel, the Code Manager received feedback on the placement of this footnote. The MEP member suggested that it would make more sense to place the action onto the MAP initiating the Metering Asset work rather than the Meter Worker, and the Code Manager agreed.
Schedule 14	6/7/8	New text has been added to Paragraph [6.4.4/7.5.4/8.5.4]	Following feedback from the CDSP, the Code Manager has introduced new legal text into these paragraphs to make clear that the MAM conducting the work has a responsibility to communicate details of that work onward to industry.
Schedule 14	6-9	Footnotes have been moved to text within the process tables.	As part of a broader review of REC Schedules by the Code Manager, footnotes are to be removed and included within process tables as text instead. R0171 will implement this for Schedule 17 in June, and as such, the footnotes have been modified accordingly as part of the R0094 proposed solution.

13 BUSINESS CASE ASSESSMENT

13.1 COSTS

There are no central system costs associated with the implementation of the proposed solution. Some REC Parties who responded to the impact assessment did indicate that they were likely to expend some resource and cost in implementing the proposed solution, but these could not be quantified.

13.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
Consumer Benefit	Improved Switch Meter Reading fidelity will greatly improve the Consumer experience. Consumers who Switch and find that their new Supplier does not have accurate details about their Metering Asset may find that they are not billed properly and have a negativewitch experience.
Improved Gas Data Quality	The proposed solution will result in improved accuracy of data relating to Metering Assets across the market, as incidents of incorrect Metering Asset details being propagated across Switches are reduced. This should provide greater confidence to any REC Party or Service Provider who regularly engages with Gas Metering Asset data.
Improved Gas Supplier Operational Efficiency	Suppliers who gain Meter Point Reference Numbers (MPRNs) with incorrect Metering Asset details need to expend resource to identify the correct Metering Asset details, update their billing systems as required, and to engage with the Consumer to rectify the issue. The R0094 proposed solution should ameliorate this issue for Suppliers and reduce their operational burden.

13.3 COST BENEFIT ANALYIS SUMMARY

As there are no Central System costs, but identifiable benefits to Consumers and Gas Suppliers, via a mechanism supported by Gas MEMs. Whilst REC Parties responding to the impact assessment did expect some level of cost to implement the proposed solution, the consensus of responses was that this cost was likely to be minimal and outweighed by the expected benefits. As a result, the Code Manager believes that this change meets the cost benefit test.

14 CASE FOR CHANGE

14.1 SELF GOVERNANCE

The Code Manager considers that there is a case for change to implement this solution, on the basis that it:

- Is both viable and implementable, and it appropriately resolves the problem statement; and
- Is cost effective and proportionate to the anticipated benefit.

15 CODE MANAGER'S RECOMMENDATION

Based on the evidence provided in sections 11 and 12 of this report, the Code Manager considers that a positive business case can be made for implementing this solution.

The Code Manager recommends that the REC Metering Expert Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 08 November 2024.

16 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
CONSOLIDATED CONSULTATION RESPONSES	Link

17 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.