

Modification proposal:	Retail Energy Code (REC) Change Proposal (CP) R0021: Allowing REC accredited MEMs to de-energise and re-energise supply points independent of the Supplier		
Decision:	The Authority ¹ has decided to approve ² this modification ³		
Target audience:	REC Board, the REC Change Panel, REC Parties and other interested parties		
Date of publication:	08 December 2022	Implementation date:	29 June 2023

Background

Currently, customers can only contract with the Registered Supplier⁴ to instruct a Metering Equipment Manager⁵ (MEM) to carry out isolation work. There is no ability to request that a MEM undertakes work independently of the Registered Supplier on single or multiple properties where they are not appointed as the Agent. This can lead to the creation of barriers in deploying solutions to help any customer (whether domestic or non-domestic) install new equipment to facilitate low and zero carbon technology (LZCT) such as the retro-fit of electric vehicle charging (EVC) points to their premises. This may be more prevalent for local authorities and social housing landlords who wish to refurbish a number of properties. Currently, they would need to liaise with the Supplier for each premises to arrange and carry out isolation works.

The modification proposal

R0021 was raised by Retail Energy Code Company (RECCo) (the Proposer) on 09 December 2021. This Change Proposal was developed in collaboration with Distribution Connection and

¹ References to the "Authority", "Ofgem", "we" and "our" are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day to day work. This decision is made by or on behalf of GEMA.

² This document is notice of the reasons for this decision as required by section 49A of the Electricity Act 1989 and section 38A of the Gas Act 1986.

³ 'Change Proposal' and 'modification' are used interchangeably in this document.

⁴ 'Registered Supplier' is defined in Retail Energy Code Schedule 1 – Interpretations and Definitions.

⁵ 'Metering Equipment Manager' is defined in Retail Energy Code Schedule 1 – Interpretations and Definitions.

Use of System Agreement (DCUSA) modification DCP394⁶. The Proposal seeks to create and define the role of a Safe Isolator Provider (SIP) in the REC.

The Proposer, in conjunction with the DCP394 working group, believes that to provide assurance to both Distribution Network Operators (DNOs) and Suppliers a SIP should be suitably qualified to carry out its activities, and that only a REC accredited MEM should fulfil this role. REC accredited MEMs will be required to accede to DCUSA prior to being appointed as a SIP and must continue to maintain their REC MEM accreditation.

The Change Proposal will allow for the owner of one or more premises to contract with a SIP to carry out works described below regardless of the appointed Supplier for each premises.

The SIP will have a limited role and only be permitted to undertake a narrow scope of works, allowing them to de-energise and re-energise a supply point. The Proposal has made clear that a SIP must not undertake any other work related to the supply point, or otherwise interfere with the Registered Supplier's metering equipment. SIPs will be subject to the same performance assurance activities as their REC accredited MEM role.

Prior to commencement of works, a SIP will be required to provide the relevant DNO with at least one working day's notice of work to be carried out, and upon completion of works should notify the Registered Supplier that work has been carried out by Market Message.⁷ The Market Message will ensure suppliers are aware of work carried out on meter points they are responsible for and allow the SIP to share Priority Service Register (PSR) information.

Energy Suppliers will still be required to provide safe isolation works directly when requested by their customers.

Responsible Committee recommendation

⁶ DCP394 "Allow any REC accredited meter operator to de-energise any metering point": <https://www.dcusa.co.uk/change/dcp-394-allow-any-rec-accredited-meter-operator-to-de-energise-any-metering-point/>

⁷ 'Market Message' is defined in Retail Energy Code Schedule 1 – Interpretations and Definitions.

At the REC Metering Expert Panel (MEP) meeting on 14 September 2022 a majority of the MEP considered that R0021 would better facilitate the REC Objectives and the MEP therefore recommended its approval.

Our decision

We have considered the issues raised by the Change Proposal and the Final Change Report (FCR) dated 14 September 2022. We have considered and taken into account the responses to the industry consultation which are attached to the FCR.

We have concluded that:

- implementation of the Change Proposal will better facilitate the achievement of the applicable Objectives of the REC;⁸ and
- approving the modification is consistent with our principal objective and statutory duties.⁹

Reasons for our decision

We consider this modification Proposal will better facilitate REC Objectives (a), (b) and (c).

(a) to ensure the REC operates and evolves in a manner that facilitates the achievement of its mission statement

The Proposer believes the creation of the SIP role will provide benefits to Suppliers and DNO's, allowing Suppliers to concentrate resources on the smart meter rollout and DNO's to focus on meeting the Low Carbon Network requirements. The Proposal seeks to achieve this by allowing MEMs to provide isolation services directly to customers, bypassing the need to request this service from Suppliers, removing a barrier to customers accessing LZCT technologies.

⁸ As set out in [Standard Condition 11B.6 of the Electricity Supply Licence](#) and [Standard Condition 11.6 of the Gas Supply Licence](#).

⁹ The Authority's statutory duties are wider than matters which the Panel must take into consideration and are detailed mainly in the Electricity Act 1989 and the Gas Act 1986.

We note that some respondents to the consultation expressed a reluctance in allowing SIPs to carry out works on metering equipment without prior Supplier knowledge. However, the Change Proposal has sought to address this by including a requirement that any aspiring SIP must first be a REC accredited MEM, and once operating as a SIP, must maintain REC MEM accreditation. We consider that this will ensure that parties are suitably qualified to be carrying out works. The Change Proposal also clarifies that the performance of a SIP will be subject to the same performance assurance measures as if they were acting in their REC accredited MEM role.

The proposal also makes clear that interfering with the Registered Suppliers metering equipment is prohibited when a MEM is performing their SIP role.

We agree with the Proposer that the creation of this role will increase competition in services available to the market, and that the prerequisites for becoming a SIP will ensure that only suitably qualified parties will be able to carry out this role. Therefore, better facilitating REC Objective (a).

(b) to ensure customers interests and data is protected in the operation of the REC

REC0021 allows for some customer vulnerability data to be collected as part of the work carried out by SIPs. We note that some consultation respondents queried whether, given the limited scope of the SIPs role and concerns around consent and data protection, SIPs should be required to collect or share vulnerability data. However, we also note that consultation responses from Suppliers were in favour of this data being collected and shared by the SIP.

Some respondents noted concerns with SIPs collecting and sharing vulnerability data with energy suppliers due to the nature of this data. However, to ensure that isolation work is carried out safely and there are no risks to vulnerable customers this information must be collected prior to the electricity supply being disconnected. The property owner will be responsible for collecting this information along with the necessary consent to share this data before providing it to the SIP

We agree with the Suppliers' position that vulnerability data should be shared. This is expected to lead to increased confidence in the accuracy of vulnerability data held by Suppliers. Further we consider that the ongoing requirement for a SIP to be a REC accredited

MEM, who as part of their role will have processes in place to manage and ensure consistency in the treatment of customer and vulnerability data.

(c) to drive continuous improvements and efficiencies in the operation of the REC and the central systems and communication infrastructure it governs

The Proposer states that the modification will better facilitate objective (c) by implementing a new Market Message to allow SIPs to share data with Suppliers post SIP works. The Proposer argues that the creation of this new Market Message will contribute to a clear audit trail when works have been carried out. Respondents differed on their support for a new Market Message. While the majority were in favour, some felt the existing MEM flows should be used. The Proposer has made clear that the SIP is a separate role from the MEM, and to avoid confusion a dedicated SIP flow will be created.

We agree with this approach of creating a new Market Message ensuring data is safely exchanged between SIP and Supplier in a manner that is consistent with the current approach for MEMs and will lead to ensuring a clear distinction between roles when a MEM undertakes SIP works. We also agree that creating a new Market Message will ensure the only the correct and relevant data is collected by the SIP and is only exchanged with the relevant parties.

Decision notice

In accordance with Standard Condition 11B of the Electricity Supply Licence and Standard Condition 11 of the Gas Supply Licence, the Authority hereby approves REC Change Proposal R0021: Allowing REC accredited MEMs to de-energise and re-energise supply points independent of the Supplier.

Michael Walls

Head of Retail Market Operations

Signed on behalf of the Authority and authorised for that purpose