

Modification proposal:	<b>Master Registration Agreement Change Proposal (MRA CP) 199: Consequential Changes to the MRA to meet the SMIP (SMRG WG4) requirements related to Registration (MRA CP 199)</b>		
Decision:	The Authority <sup>1</sup> provides its consent for this change to be made <sup>2</sup>		
Target audience:	MRASCo, Parties to the MRA and other interested parties		
Date of publication:	9 January 2013	Implementation date:	7 November 2013

## Background to the modification proposal

As part of the Smart Metering Implementation Programme (SMIP), the Department for Energy and Climate Change (DECC) established the Business Process Development Group (BPDG). The BPDG published its Legacy System Changes (Enduring) report<sup>3</sup> which provides an overview of the changes to industry legacy systems in preparation for the full implementation of the new Data and Communications Company (DCC).

Working Group 4 of the SMIP's Smart Meter Regulation Group (SMRG) was established to consider consequential changes that will be needed to existing industry codes and agreements. SMRG working group 4 requested assistance from MRASCo in developing a detailed definition of changes needed to the Master Registration Agreement (MRA). Informed by the MRA Expert Group's report and change proposal recommendations,<sup>4</sup> SMIP concluded that the identified consequential changes should be considered in accordance with normal MRA governance arrangements.

## The modification proposal

This change proposal introduces new MRA provisions which are consequential to SMIP requirements related to the registration of supply points and associated metering information. It will introduce changes including, but not limited to:-

- Extension of the Metering Point Administration Data (MPAD) to introduce new 'Smart' data requirements;
- Provisions that would enable DCC to interact with Metering Point Administration Service (MPAS) with defined rights to receive data and defined obligations to provide data; and
- Updates to MPAS Validation Rules.

This proposal includes proposed changes to MRA clauses that are defined as Priority Provisions. The governance of the MRA requires that changes to Priority Provisions can only be made with the Authority's consent.

## MRA Development Board

The MRA Development Board (MDB) considered the change proposal at its meeting of 8 November 2012 and voted unanimously to accept the change, as modified at that

<sup>1</sup> The terms 'the Authority', 'Ofgem' and 'we' are used interchangeably in this document. Ofgem is the Office of Gas and Electricity Markets.

<sup>2</sup> This document is notice of the reasons for this decision as required by section 49A of the Electricity Act 1989.

<sup>3</sup> The BPDG report was shared as part of the papers for the BPDG meeting on 10 November 2011. A copy is available from DECC's website:  
[http://www.decc.gov.uk/en/content/cms/tackling/smart\\_meters/industry/odag/bpdg/bpdg.aspx](http://www.decc.gov.uk/en/content/cms/tackling/smart_meters/industry/odag/bpdg/bpdg.aspx)

<sup>4</sup> The MRA Expert Group provided an update as part of the papers for the SMRG Working Group 4 meeting on 6 February 2012. A copy is available from DECC's website:  
[http://www.decc.gov.uk/en/content/cms/tackling/smart\\_meters/industry/reg\\_groups/reg\\_groups.aspx](http://www.decc.gov.uk/en/content/cms/tackling/smart_meters/industry/reg_groups/reg_groups.aspx)

meeting. We note that consultation responses mainly related to proposed changes that can be made to the MRA without specific Authority consent. However a housekeeping modification, to update numbering, was made to the change proposed to a Priority Provision (Schedule 2). MDB agreed that this housekeeping change was needed to take account of changes made to Schedule 2 when MRA version 10.0 was implemented on 1 October 2012.

### **The Authority's decision**

The Authority has considered the issues raised by the change proposal and the Change Report submitted to it on 30 November 2012. The Authority has also considered and taken into account the responses to the consultation on this proposal that were reported in the minutes of the MDB meeting held on 8 November 2012. The Authority has concluded that the implementation of the changes proposed to Priority Provisions within this change proposal is consistent with the intent of the MRA as set out in Standard Condition 23 of the Distribution Licence.<sup>5</sup>

Whilst our consent relates specifically to the proposed amendments to the Priority Provisions of the MRA, that is those provisions listed in clause 9.5.1, we have read these amendments alongside the other proposed amendments in change proposal MRA CP 199 and have provided some general recommendations in the following paragraphs.

### **Reasons for Authority decision**

We note that changes can be made to MRA clauses that are not within the definition of Priority Provisions without the Authority's specific consent. The Authority has considered the changes proposed to Priority Provisions and the overall impact of the change proposal MRA CP 199. We consider that the changes proposed in MRA CP 199 are consistent with those identified as required for SMIP.

We consider that the changes defined within this proposal should better facilitate competition in the supply of electricity by ensuring that all parties that would need to be involved in the change of supplier process (following changes required as part of SMIP) would be able to receive and/or be required to provide relevant data. For the same reason, we also consider that the proposed changes would be conducive to the operation of an efficient, co-ordinated and economical system for the supply of electricity.

### **Legal text**

We note that this change proposal has been developed in advance of final definitions in respect of DCC and relevant activities being available. In this respect, the legal text submitted to the Authority has been provided with square brackets around some areas of text. We acknowledge that a further modification to the MRA will be required in due course to ensure consistency and accuracy of relevant defined terms.

We further note that there is a typographical error within the legal drafting in respect of the defined term 'Data and Communications Company'. Elsewhere in the drafting this appears as 'Data Communications Company'. We also note that the change proposed to the data item numbering in Schedule 2 has not been reflected in the changes proposed to clauses 24.9 and 24.13.2. We consider that these typographical errors should be corrected by a housekeeping modification.

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<http://epr.ofgem.gov.uk/Pages/EPRInformation.aspx?doc=http://epr.ofgem.gov.uk/EPRFiles/Electricity+Distribution+Consolidated+Standard+Licence+Conditions+-+Current+Version.pdf>

Finally, we consider that references to Q1 and Q2 2014 in the drafting could potentially cause confusion in light of references elsewhere in the MRA to the Financial Year, that being the period April to March. We understand that use of 'Q1' and 'Q2' in the proposed legal text is intended to refer to the Calendar Year, that being the period January to December, in line with DECC's description of SMIP milestones. We appreciate that specific timings are not yet known, however consider that greater clarity could be achieved by a housekeeping modification to indicate a specific date before which MEC may not determine the activation of the service.

### **Decision notice**

Pursuant to clause 9.5, we consent to changes to Priority Provisions defined in change proposal MRA CP 199 being made.

**Colin Sausman**

**Partner, Retail Markets and Research**

Signed on behalf of the Authority and authorised for that purpose