



**Association of Meter Operators**

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By e-mail

Rachael Clark  
Ofgem Switching Programme  
SwitchingProgramme@ofgem.gov.uk

Dear Rachael,

**Retail Energy Code v2.0 and Retail Code Consolidation**

I am responding on behalf of the Association of Meter Operators, the trade organisation that represents gas and electricity meter operators across Great Britain. The AMO membership represents a variety of sectors of the electricity and gas metering markets including domestic, non-domestic, installers and operators as well as meter data management agents. These agents are engaged by energy suppliers and provide services that support consumers.

The AMO has previously responded to Ofgem and offered support for the REC programme. The AMO has also engaged with Ofgem through the Faster Switching programme to explore the ways in which the industry processes and data relating to metering may need to adapt. The AMO has discussed the proposals for the Retail Energy Code with its members and recently the AMO consultants have participated in the detail work of the Regulatory Design User Group as well as subsidiary industry groups working on the many issues related to the migration of the codes. In all that work we have sought to fairly represent the varied views of members, taking account of the fact that electricity meter operators governed under MOCOPA® start with a different outlook when compared with gas meter operators who are subject to MAMCoP and AMICoP governed under SPAA.

We set out below our responses to the consultation question and also submit them within the Excel template.

*Question 2.1: Do you agree with our proposed approach to information security and data protection assessment under the REC? In particular, do you agree with the requirement for all REC Service Users to notify the Code Manager of a security breach?*

In principle we agree with the reporting of security breaches, however, there should be a definition of what is required. In general, it could be defined as a “Material Security Breach” which affects the systems interacting with the Retail Energy Code. There are existing definitions of a Material Security Breach which

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have been agreed with the National Cyber Security Centre. (NCSC) As an example, a hijacking of a Twitter account for a short period would be a breach but not reportable to REC.

*Question 2.2: Do you agree with our proposal to extend entry qualification to new gas MEMs? If not, please explain why.*

**Yes.** We support the proposal to ease the transfer for existing qualified operators and also to ensure that there is a clear qualification process for any new operators.

We would add that our interpretation of the REC qualification regime would appear to place a greater emphasis on system testing/proving for all MEMs (as outlined in the Qualification and Maintenance Schedule). This should not be an issue for current holders of accreditation under MAMCoP but may be a greater issue for AMIs, and particularly for small portfolio or limited scope AMIs. This may also be the case for a number of small MOCOPA Operators and Electricity Distributors. Some additional detail will be needed to provide clarity so that all MEMs are confident that they are aligned with the REC requirements and if necessary, can ensure that their ability to demonstrate capability is appropriate.

*Question 2.3: Do you agree that the change effected by MAP CP 0338 should apply equally to gas?*

**Yes,** this supplier obligation should apply for both electricity and gas.

*Question 2.4: Do you agree that the clarification on the applicability of the schedule to non-domestic suppliers sufficiently gives regard to non-domestic suppliers who do not serve prepayment customers?*

**Yes.** The schedule relates to prepayment customers regardless of the market sector of the energy supplier. It is appropriate to make this obligation customer-centric and not to have a complex carve-out based on the supplier's market sector.

*Question 2.5: Do you agree that the approach and processes for gas unregistered sites should be standardised, as set out in the Unbilled Energy Code of Practice?*

**Yes,** we believe this is the right approach.

*Question 2.6: Do you agree that the REC should make provision for the PAB to consider the case for reconciliation of data held by PPMIPs and CDSP for the purpose of identifying unregistered sites? If so, do you agree that this process should sit in the Unbilled Energy Code of Practice?*

**Yes,** this is a pragmatic approach.

*Question 2.7: Do you agree with the principle that a consumer should be no worse off by virtue of a theft investigation being undertaken by a network company rather than a supplier?*

**Yes**

*Question 2.8: Do you agree that the requirements relating to provision of customer contact details should apply equally to non-domestic suppliers, as set out in the Transfer of Consumer Data Schedule?*

**Yes**

*Question 2.9: Do you agree with our proposal to extend 'Gas use case 5: Payment of Guaranteed Standard of Performance Payments' to cover voluntary payments?*

**Yes**

*Question 2.10: What risks (if any) do you foresee in the transfer of processes associated with Commissioning, Complex Sites, Proving and Faults from BSCP514 to the REC Metering Operations schedule?*

We do not foresee any difficulty with the proposed approach. This matter was discussed at a recent BSC industry discussion. There was no appetite to move the process steps defined in BSCP514 & 515 into Metering CoP4. The AMO support this view. Commissioning does impact Supplier, Distributor, Meter Operator and Data Collector, as do many processes. This interaction is part of the detail that will need to be worked through in 2021.

*Question 2.11: Do you agree that requirement to comply with the BSC CoPs should be placed directly on MEMs in the REC? If not, please explain your reasons.*

**Yes**, the AMO support the movement of the BSC Metering Codes of Practice into the REC. However, the BSC CVA activity will remain under the governance of the BSC, as such it will need to refer to the REC Metering CoPs, the Metering CoPs change process will therefore need to allow for the BSC and CVA Meter Operators, who will not be REC signatories to be able to propose changes the Metering CoPs.

We make further reference to points in the consultation document; at paragraph 2.63 it is noted that as BSCP601 seeks to demonstrate equipment compliance with the Metering CoP requirements then there is probably value in this forming part of the REC assurance activity.

Para 2.65 highlights the indirect nature of the current governance of Meter Operators. The BSC put the obligation on Registrants, but the obligations are really on the Meter Operator. BSC Modification P332 commenced in 2016 and is still running. It has floundered on difficulty of seeking to make Meter Operators more accountable under the BSC. If the proposed changes occur under the REC, then this problem is resolved.

During 2020 the AMO raised, what is now Issue 93 with the BSC to consider changes to the Metering CoPs to address a number of defects. The first meeting of this group is due in Feb 2021 and is not expected to conclude by Sept 2021; any changes the group propose will need to be considered under the appropriate governance arrangements at the time.

The aspect of Dispensations should be considered. The BSC has a process to facilitate Dispensations from the requirements of the Metering CoPs. These are justified on a site-by-site basis, and may be time limited, where for example the Metering CoPs cannot be fully achieved for some specific reason, like space, or legacy equipment. The other type of Dispensation is a Generic Dispensation which typically applies when specific equipment is not able to be compliant and is allowed Dispensation, again typically for a specific timeframe. This is an aspect that needs consideration of whether this process remains in the BSC or moves to the REC. The CVA site specific dispensations are probably best to remain in the BSC, but SVA site specific and Generic will possibly need some joint consideration. Currently the BSC operates a Metering

Dispensation Review Group, whose views are considered by ISG & SVG. There may be a need for a continued linkage to ensure that Dispensations that span codes remain aligned.

In the summer of 2020 the AMO sought to raise a BSC Modification. This was considered by the BSC Panel and advice sought from Ofgem. In the event, based on the Ofgem response this application was withdrawn. Part of the Modification was seeking to make the obligations for provision (and maintenance) of communications equipment for Advanced Meters explicit within the BSC. Currently the Meter Operator has no obligation to install communications equipment, whereas the Supplier has an obligation to install communications on Advanced Meters under their supply licence. This has led to differences of views between Suppliers, Meter Operators and customers. This clarity would have been provided through changes to the Metering CoPs. Going forward this is a proposal that can be revisited under the REC, where the emphasis on accurate customer billing may be of greater impact, particularly as result of the Covid-19 preventing site visit data collection. The lack of smooth migration of remote communications is also a repeated criticism of the current of the current arrangements directly impacting on customer billing and settlement.

*Question 2.12: Do you agree that metering operations rules and processes in the REC could be assured by the BSC, particularly with regard to PARMs reporting and technical assurance audits, until the assurance function can transition to the REC? If not, please explain your reasons.*

A key aspect is the transitional arrangements. Although the intent at transition is a simple 'lift and shift' into the REC, the practice may need to be more complex. There will be activities, such as Qualification, change and assurances activities which are 'in progress' during the transition. These need to be carefully managed through the transition to ensure that there are no gaps left.

Para 2.69 notes the PARMs reporting is of limited value and in 2020 the BSC PAB agreed to remove many of the reporting requirements as they were deemed to be inconsistently reported and of limited value in gaining any assurance. On that basis a new set of reporting should be considered under the REC, rather than retaining the legacy BSC PARMs.

The Technical Assurance activities for SVA metering would fit well with the REC Assurance activity. This will give the opportunity in the future to consolidate assurance activities which currently span MOCOPA and the BSC.

It should also be considered whether this consultation should set out the intention to move Metering obligations from the BSC to the REC, but the exact detail of the timing for these movements can be staggered. Unlike many of the codes moving to the REC the BSC will continue to exist so there is not the same imperative to resolve every aspect by Sept 2021. Although for clarity and to enable the continued development the migration in a period of say by Spring 2022 would give certainty of the obligations.

*Question 2.13: Do you agree that the information in the RGMA Baseline relating to exceptions should be out of scope of the mandatory Schedule?*

**Yes**, we agree that the proposal is the pragmatic way to deal with the RGMA exceptions. The process so far has acknowledged the different historical basis of the electricity and gas regimes and the differences in the way that the data sets and data-transfer mechanisms have operated. It will be appropriate for the consolidated code manager to review across the piece and keep under consideration ways to achieve greater alignment where appropriate.

*Question 3.1: Do you agree that the proposed text to embed the Cross Code Steering Group will enable the intended improvements to cross code change? If not, please suggest alternative or additional drafting.*

**Yes**, there should be a far more efficient method for cross-code changes to be progressed. There are many examples of difficulty with a change being raised in one governance arrangement impacting another code but then having to go through further debate and justification. From an AMO perspective moving all the metering activity into the REC will help mitigate the historic cross-code impacts between the BSC & MRA.

*Question 4.1: Do you agree with the assignment of Code Manager ownership (Metadata Owner) of each Energy Market Message within the “Annex D – Message Scenario Variant Catalogue”?*

The proposed ownership of flows does not reflect the BSC/REC split for Meter Operators. Flows like the D0150 & D0268 are shown as owned by the REC, which makes sense, but the D0214, D291, D0343, D0344 are less clear. There are also a series of interactions like the fault reporting and appointment processes, that use common flows for meter operator and Data Collector interactions. An approach may be to recognise dual ownership.

As part of the Marketwide HH Settlement activity a series of data flow instances (or the whole flow) have been identified which may no longer be required. The industry has not been focused on removing redundant or unnecessary interactions. There is probably information being sent to various parties which is no longer of value. Ideally, these should be identified, challenged and where possible removed. This will simplify and reduce cost across the industry.

*Question 4.2: Do you agree with the classification of existing flow notes (including DTC Annex C) to either one of, a rule within the Data Specification, a Guidance Note (managed under the respective code, e.g. a REC Level 3 document) or a process obligation (e.g. a rule within a REC Schedule / BSCP)?*

**Yes**

*Question 4.3: Do you agree that the data items identified in ‘Redundant Data Items for Review’ spreadsheet should no longer be represented in the Data Specification as they are not associated to any Market Messages?*

**Yes**

The consultation is accompanied by a large volume of supporting documents. We acknowledge that many of these are ‘work in progress’ and that a great deal of further work will be undertaken on the schedules before they are embodied in REC v2. As we have during the development to date, we will continue to support the work of RDUG and other groups. For now, we wish to make the following observations on matters that we anticipate will feature in the continuing discussions as we move towards implementation.

## **DEFINITION OF METERING EQUIPMENT MANAGER**

This a term used through the REC to identify the operators that will become parties to the Code. Currently the terms, Meter Asset Manager, Meter Operator, Approved Meter Installer, AMR Service Provider, etc. are defined in their own Codes and some cases referred to elsewhere, e.g. Meter Operator defined in the BSC. This means that the definitions, as a result of their different origins, vary between gas and electricity, between

the types of activity undertaken and sometimes between Codes. Whilst the headline is that all metering companies will be required to accede to the REC it is not clear that all companies fit the definition of a MEM. Some further work is required to clarify how these many different classes of operator can be drawn under a single identification as MEMs.

**REC METERING GROUP** - We have contributed to the development of the terms of reference for the REC Metering Group and will continue our support through the development of further detail in relation to the role of the group and the mechanisms for nominating representatives for our member MEMs.

We wish to make these specific comments in respect of the Metering Group draft terms of reference.

The group is constituted with a small number of representatives; we suggest that the two MEM members are drawn so that the many, varied metering companies that accede to the REC can have confidence that they have a 'voice' in the Metering Group. Ideally, the representatives should have a formal connection to their constituencies and ideally one each representing the electricity and gas sectors.

Section 2.3 Members: In other Agreements, such as the Smart Energy Code, there are provisions for "Other Parties" to be represented on a governance board. The advantage of this is that it allows organisations such as Trade Associations to participate and bring perspective and knowledge to such panels. We note that the draft terms of reference do not preclude that a trade association could be nominated as a MEM representative to the Metering Group.

Section 2.5 Confidential Information: It is possible that this Group will receive Confidential Information such as in relation to safety aspects of equipment which is not in the public domain. The REC and therefore all of the committees/groups should have an Information Security Classification Scheme which applies throughout REC.

Section 2.11 Chair: Typo – penultimate word should be "their"

Section 3 Declaration of Interest: Where a member declares a financial interest (of their employer) in respect of a Change Proposal then that member should be excluded from the discussion and voting.

**QUALIFICATION** – The Qualification and Maintenance Schedule sets out requirements for new applicants. Under the BSC there are a number of BSC existing Meter Operators which are 'qualified' but have either never commenced operations, or have stopped operations and are currently dormant. The risk with these companies is that they may have been initially qualified several years ago, but having not operated in the interim, if they were to commence operation now, the basis of their original qualification will have changed materially. The transfer to the REC would be a good opportunity to purge these dormant organisations from the Qualified persons, some criteria will be required to fairly identify those where in effect their qualification has so lapsed.

The migration to REC is planned to be 'lift and shift' although there may be some transitional disruption. Although a 'code freeze' is to be implemented to limit activity with code changes it would be helpful to ensure that the audit and surveillance activities are maintained. This will give confidence to MEMs and the wider market that the high standards required under qualification are being maintained. Activities of the respective scheme auditors should continue throughout the transition process. Failure to meet the requirements should continue to lead to a process which could result in removal of qualification.

## **METERING ACCREDITATION SCHEME SCHEDULE**

### **APPENDIX C - METER OPERATION CODE OF PRACTICE AGREEMENT:**

This section needs further development to enable the migration of MOCOPA into REC. There are a substantial number of omissions from the current Schedule C. An updated Schedule C should be created and issued for consultation as soon as possible.

Schedule C Section 1.4. Typo first word should say "Once" (not "One")

We would be happy to elaborate on any of the points made above.

Yours sincerely,

David Wright, Chair, Association of Meter Operators

cc. Geoff Huckerby, Tom Chevalier, Eric Fowler

Consultants to the Association Meter Operators