

CONSULTATION RESPONSE

C3-0091 – CHANGES TO METERING EXPERT PANEL TERMS OF REFERENCE TO SUPPORT ALTERNATE R0170 SOLUTION

DATE ISSUED	04/12/2024
RESPONSE DEADLINE	18/12/2024

LINKS

- [Change Proposal Page](#)
- [Consultation Register](#)

The completed response document should be uploaded to the REC Portal. On the Consultation Page click 'Add Response' to upload the completed document. Further information about Consultations can be found in the [Change Management User Guide](#).

All responses will be treated as non-confidential unless indicated otherwise. Responses marked as confidential will be shared with RECCo, The Code Manager, Responsible Committee and the Authority (where relevant) but will not be published to REC Parties, Service Providers or wider stakeholders.

Anonymous responses will omit the detail of the submitting Organisation, but the content of the response will be published on the REC Portal and provided to the Responsible Committee as part of the Final Change Report.

1 RESPONDENT DETAILS

NAME	Paul Abreu
ORGANISATION	Energy Networks Association
ORGANISATION CATEGORY	Trade Association
EMAIL ADDRESS	paul.abreu@energynetworks.org
TELEPHONE NUMBER	07792221011
RESPONSE CONFIDENTIALITY	Non-Confidential

2 QUESTIONS

1. Do you agree with the proposed solution? If not, please explain why?	
<p>Electricity Network Operator (ENO) members of ENA would support any solution that does not provide other REC parties an opportunity to dictate ENO asset management policy to the ENO. Although the proposed solution offers voting equivalence similar to what existed under MOCOPA, we are concerned that soon after implementation of this change the Code Manager will receive a further change proposal requesting the re-categorisation of STIRG from a REC Category 3 document to a REC Category 2 document. Changing STIRG to a Category 2 document would move change acceptance/rejection decisions out of REC MEP thereby reintroducing the imbalance in the voting arrangements that gave rise to ENO concerns from the outset, and which lead to the rejection of R0145 at REC MEP on 14/02/24.</p> <p>Although ENOs are supportive of the aims of this change, we are concerned that a further change to re-categorise the document will undermine the outcome. As a further proposal is expected, repeating R0145, we look to the Code Manager to work with REC Parties to resolve this impasse by arriving at a solution that respects the ability of ENOs to control their own asset management policy and ensures that this fundamental principle is not compromised.</p>	
RESPONSE CONFIDENTIALITY	Non-Confidential

2. Do you have any comments on the updated legal text, to ensure there must be a DNO and MOA representative?	
No	
RESPONSE CONFIDENTIALITY	Non-Confidential

3. Do you agree that this change resolves the problem statement for R0170 (Withdrawal of Service Termination Issue Reporting Guidance (STIRG) from REC Governance)?

Unfortunately, we do not agree that this change resolves the problem statement from R0170. We are aware of a clear intention from another REC Party (REC MEP 11/12/24) to raise a further change to re-categorise STIRG as a Category 2 document, thereby reintroducing the imbalance of change voting and this will re-introduce the significant risk to ENOs that gave rise to their concerns from the outset. This will bring matters back to where we were with R0145.

RESPONSE CONFIDENTIALITY

Non-Confidential

4. Do you anticipate any benefits or risks to your organisation, or to the industry, as a result of this change? If so, please provide details.

The expected outcome of this change will be undermined soon after it is implemented by the introduction of a further proposal that will seek to re-categorise STIRG to a Category 2 document.

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5. Do you agree with the implementation date of 20 December 2024?

As a result of the discussions at REC MEP 11/12/24, it may be advisable for the Code Manager to reconsider whether to proceed with the implementation of this change and work towards further discussions with REC Parties to try to find a workable solution.

RESPONSE CONFIDENTIALITY

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6. Do you have any other comments relating to this change?

If the STIRG document is to exist under the governance offered by REC, we look to the Code Manager to work with REC Parties to resolve the impasse by arriving at a solution that respects the ability of ENOs to control their own asset management policy and ensures that this fundamental principle is not compromised.

RESPONSE CONFIDENTIALITY

Non-Confidential