

Modification 0863S – Erroneous Transfers Exception Process

Workgroup Action 1201

Summary of discussions with REC provided by Proposer.

As you'll remember I was heavily involved in making changes to the ET process under SPAA / MRA and raised the change to introduce the RET flow into the DTN. Because the ET process was in SPAA it was never mandated for non-domestic suppliers or non-domestic sites. This has continued in REC and would need to be resolved either before your change or as part of your change. I would recommend you try UNC in the first instance but to help you I've included how a REC change could look, to help explain the complexities:

Schedule 30, and specially the part related to ETs, is not mandatory for non-domestic gas suppliers. It is optional to carry out an ET and also to use the RET process or the DTN. There was a process under SPAA to have a register of all suppliers that had opted in but I believe that is proving challenging under REC as it hasn't been mandated. If all suppliers are not opted in it makes your proposed change extremely difficult to implement.

Additionally, the MRA used to have the ability for suppliers to agree bilaterally how to resolve the financial impact of an ET (do nothing, i.e., use the normal CoS reading or use a 1kwh advance if the ET was resolved within 3 months) but this was removed when Schedule 30 was set up. I've been trying to find the wording on why it was taken out but think it was via a RDUG consultation and I'm struggling to find the papers. It was in the MRA transitional schedule in RECv2 and didn't make it into the creation of Schedule 30 in RECv3. I would not recommend reintroducing the 1kWh advance – it caused all sorts of issues for settlements, even for domestic sites, and just added to confusion if the reading was disputed.

If you wanted to go through the REC, I'd recommend you open this up to domestic and non-domestic suppliers and both fuels as I know several suppliers have tried to have discussion on this over the years. As mentioned above, the process only really works if all suppliers are mandated to follow the process so the opt-out for non-domestic gas suppliers and sites would need to be resolved or updated to allow suppliers to easily know when it does or doesn't apply. It could also look at the exclusion of HH electricity sites – this has been discussed since P272 and will only increase as we move towards MHHS.