

P379 Policy and Regulatory Log – Issues outside P379

No	Item	Issue description	Impact	Impacted Code or Body	Status/ next steps
1	Exempt supply licence changes	Changing exempt supply arrangements will mean licence/policy changes. The WG agreed that licence changes are outside the P379 solution and should be dealt with separately. However, recommendations from this Mod can be passed to Ofgem and BEIS for consideration. This is subject to how the P379 discussions progress and if this can be fed into the Ofgem and BEIS review of Future of Retail Markets. There are ongoing discussions and project work on the Future of Retail Markets. Ofgem offered to provide an update on ongoing discussions and take questions on this.	Low	BEIS	On hold – P379 solution no longer considering exempt suppliers. No further actions
				Ofgem	
2	Generic licence changes	Does a supplier acting in the capacity of a secondary supplier need to retain all obligations to a customer appearing in the licence? Are there restrictions in the current licence that would prevent a supplier acting as a secondary supplier or cause a primary supplier to breach obligations (includes GSS, billing requirements)?	High	Ofgem	Follow up with Ofgem to scope potential licence changes - Ofgem leading. Ofgem presentation at workgroup on 24 September may cover issue
3	Faster Switching	Faster switching review - one day switching + supporting data transfers/governance frameworks (Including REC)	Medium	Ofgem	Timescales for data transfer between suppliers/calcs platforms will need to take into account faster switching requirements. To be included in business requirements

4	MWHHS	Introduces new arrangements for half hourly data to pass through	High	Ofgem	Solves some issues with data transfer volumes for the DCC. Data transfer processes - Design consideration (solution could look to design solutions useful for MWHHS?). Consider in BRs.
5	Charging review	Review of network charging - impact on how charges are allocated to each party involved	Low	Ofgem	Unclear that any change is necessary re: network charging - impacts business model/tariff structure for primary/secondary suppliers. No further action.
6	Future retail markets	Potential future SCR - full review of retail markets. Possible risk of subsumed Mod	High	Ofgem	Does not yet exist. No further action at this time.
7	Secondary Supplier obligations	The Workgroup will consider whether the Secondary Supplier needs to be Party to the Master Registration Agreement (MRA). It was noted that this depends on what is stated within the licence conditions.		MRA/Ofgem	No change to supplier registration at boundary point (no MRA impacts immediately) as all licensed suppliers. No further action. MRA impacts possible if MRA is the register of secondary supply relationships.
8	Class A exempt supply and the codes	Supplying over the public network requires Suppliers to become party to and comply with Codes. The MRA, DCUSA and BSC require that all suppliers are licenced. For this reason exempt supply over the public network requires a Third Party Licensed Supplier to provide relevant code-related services to the exempt supplier.	Low	DCUSA	P379 is now working under the assumption that the Secondary Supplier will be a licensed Supplier. Discuss with MRA feasibility of using MRA to register behind-the-meter meters (consider also P375 solution – for VLPs rather than Suppliers so cannot use MRA)
				MRA	

9	Use of Systems charges	On Network charges members questioned who will be responsible for paying the use of systems charges. It was clarified that in the proposed solution each Supplier would be expected to pay their own volumetric charges, with the primary Supplier responsible for passing through capacity-based charges. However, this could depend on the premises arrangements. Suppliers need to understand the impact to their business. Changes may be required under the Distribution Connection and Use of System Agreement (DCUSA) and the Connection and Use of System Code (CUSC). This needs to be discussed separately under the DCUSA and CUSC codes.	Low	DCUSA	As network charges are based on settlement volumes volumetric charges will be correct. Fixed charges as pass-through cost for boundary meter contractual matter for Primary Supplier (consider in pricing of contracts for primary supply).
				CUSC	
10	Secondary Supply arrangements	What happens to a customer's secondary supply arrangements when they vacate a premises? Either the new customer picks up responsibility or the contracts somehow port to the customer's new MPAN. Does there need to be a mechanism for cancelling secondary supply arrangements when a customer vacates? Can a Secondary Supplier charge the customer if they break the contract in this way?	High	Ofgem	Ofgem to consider – licence condition?
11	SMART'	Smart meter limitations; - single tariff register for IHD. Single credit register for PPMs. BEIS drive for smart meter as EV comms hub. Access to smart meter information. DCC network capacity.	high	Ofgem/SMETs (SECAS) DCC	Engage with SECAS to identify potential solutions (include considering in updated SMETS – cost/benefit would be useful)

12	Multiple consumers	Licences drafted based on one MPAN one consumer - could be multiple consumers behind the boundary point using different suppliers	Low	Ofgem/Other(?)	Work with Ofgem (potentially via innovation trial?) Identify licence & network charging restrictions on multiple customers. Ask proposer & workgroup view on next steps to address. Potential review codes/licences for other issues.
13	Vulnerable Customers	Looking at some of the below scenarios: <ul style="list-style-type: none"> • Supplier failure (of primary or secondary) • Deemed contracts • What happens if a consumer moves home <ul style="list-style-type: none"> • Customer switching of secondary supplier • Consumer protections and what's expected of each supplier in relation to vulnerable consumers. 	Low	Ofgem	As per existing review of licence conditions – to consider whether vulnerable customers need particular protections in respect of a secondary supply.