

## 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)? Is a Supplier allowed to change their tariff if a customer picks up a Secondary Supply in the middle of a middle of a fixed tariff?	Medium	Ofgem	Do not believe Licence changes are urgent but review possible between P379 approval and implementation.

<b>3</b>	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. Systems changes (e.g. MPAS to CSS) have been considered. Included in business requirements
<b>4</b>	MWHHS	Introduces new arrangements for half hourly data to pass through	Medium	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?). Increases applicable customers. WG feels there is case for aligning implementation dates.
<b>5</b>	Charging review	Review of network charging - impact on how charges are allocated to each party involved	Medium	Ofgem	Changes of network charges to capacity based may result in new methodologies to allocate charges between Suppliers. Increased number of per-MPAN charges may distort network charging distributions between Primary and Secondary Suppliers.
<b>6</b>	Future retail markets	Future retail markets work may change playing field for Modification.	Low	Ofgem	Awaiting update on work.
<b>7</b>	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.	None	MRA(REC)/ 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.
<b>8</b>	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	None	DCUSA	P379 is now working with the requirement that the Secondary Supplier will be a licensed Supplier.

		this reason exempt supply over the public network requires a Third Party Licensed Supplier to provide relevant code-related services to the exempt supplier.		MRA(REC)	
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 and current network charging rules 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.	Medium	DCUSA	<p>Network charges are based on metered volumes sent by Agents. These volumes will not necessarily be correct (particularly in proposed solution). Would need to be new flow from settlement to distributors to ensure correct DUOS charges.</p> <p>Fixed costs may fall entirely on one supplier. This can be addressed by splitting fixed costs between suppliers – may be problematic if charges are changed retrospectively.</p> <p>Network code changes will be required to ensure charges can be levied on Secondary Suppliers for volumes where they are not recorded as the meter registrant.</p>
				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?	Low	Ofgem	WG determined that existing change of supplier processes apply for Primary Supplier and Secondary Suppliers may end up with unbillable energy, which they cannot charge to the incoming customer. May need to develop contractual arrangements to avoid this scenario. No further work.

<b>11</b>	SMART'	<p>Smart meter limitations; - single tariff register for IHD. Single credit register for PPMs. Double payment on PPMs. BEIS drive for smart meter as EV comms hub. Access to smart meter information. DCC network capacity.</p> <p>MiData integration – availability of historic consumption data</p> <p>Charging for Smart infrastructure – will costs fall entirely on the Primary Supplier, and will Secondary Suppliers get access to that infrastructure for 'free'</p>	High	Ofgem/SMETs (SECAS) DCC	Engage with SECAS to identify potential solutions (include considering in updated SMETS – cost/benefit would be useful). SEC Mods will be required to resolve IHD and PPM issues.
<b>12</b>	Multiple consumers	Licences drafted based on one MPAN one consumer - could be multiple consumers behind the boundary point using different suppliers	Low	Ofgem/Other(?)	Supply is related to premises, and where there are multiple consumers on a premises this is likely covered by landlord/tenant relationships and associated rules. No further action.
<b>13</b>	Vulnerable Customers	<p>Looking at some of the below scenarios:</p> <ul style="list-style-type: none"> <li>• Supplier failure (of primary or secondary)</li> <li>• Deemed contracts</li> <li>• What happens if a consumer moves home <ul style="list-style-type: none"> <li>• Customer switching of secondary supplier</li> </ul> </li> <li>• Consumer protections and what's expected of each supplier in relation to vulnerable consumers. <ul style="list-style-type: none"> <li>- How to ensure that customers identified on PSR are communicated to all Suppliers</li> </ul> </li> </ul>	Medium	Ofgem	As per existing review of licence conditions – to consider whether vulnerable customers need particular protections in respect of a secondary supply.

14	Price cap	How will Secondary Supply arrangements interact with the price cap? Will secondary suppliers be price capped?	Low	Ofgem	Ofgem to consider interaction of multiple suppliers with price cap including whether secondary supplies should be price capped.
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