RETAIL ENERGY CODE

REPORT CATALOGUE FREQUENTLY ASKED QUESTIONS AND ANSWERS (FAQS)

Below is a list of frequent questions and answers the Code Manager receives in relation to the Performance Assurance Report Catalogue.

REPORTING & REPORTING TIMESCALES

1. WHAT IS THE CUT-OFF FOR PROVIDING DATA?

Data should be provided by the first working day of the month, with a one-month lag from the performance month. For example, data for the month of January will be required by the first working date of March and will form the input for the March Risk Assessment.

For data submitted at a lower frequency submission will be due by the first working day of the second month after the quarter – i.e. the same one-month lag principle applies. For example, data relating to the first quarter of the year will be due on the first working day in May.

Our expectation is the majority of data provision (and particularly for larger organisations) should be based on automated/scripted data extracts and should not involve significant manual collation activities. Therefore, we would look to gradually shorten the submission window over time once Parties have had sufficient opportunity to build automated processes.

Note this is a change from the timing previously communicated which sought to obtain data to allow reporting to the Performance Assurance Board (PAB) without the month's lag – however based on feedback from Parties this has been amended to provide additional time for reporting to be produced and submitted.

2. WHEN WILL THE DATA FIRST BE REQUIRED?

As recently communicated and based on feedback from Parties an updated transitional approach will be adopted.

Data already available under existing arrangements and/or already reported under existing obligations (e.g. Ofgem complaints reporting) will be required for performance period September 2021 (hence data required 1 November 2021). This therefore relates specifically to the following items in the report catalogue: item 101 (Ofgem Complaints Data), item 1330 (SMIS Survey Data) and item 1340 (Supplier Theft Files).

All other data requests have been deferred and will not be required until January 2022. Data submitted for January 2022 should cover the period 1 September 2021-30 November 2021.

Note if Parties wish to submit reports prior to January 2022, including to confirm processes and any validation questions the facility to do so will be available.

3. WHAT IS THE ENDURING PROCESS FOR DATA SUBMISSION?

Data will be uploaded via the REC Portal, and detailed guidance is available from the help pages and via the support desk if required.

At a high level each month files will be uploaded via dedicated pages on the portal using standard upload functionality. Additional capability for automated/API driven upload is expected to be released in future versions of the portal.

Following provision data will be subject to initial validation and queries raised with Parties if required. Data will then be processed and utilised for Risk Assessment and other relevant reporting, with detailed deviations shared with Parties via the REC Portal.

4. WHAT IS THE LEAD TIME FOR THE PROVISION OF REPORTS?

As noted in FAQ #2 an updated transitional approach has been adopted for the initial set of data provision.

For future changes to the Report Catalogue as much notice as possible will be provided however for the avoidance of doubt a standard six-month lead time will not be applied as an appropriate lead time will depend on the nature and extent of changes. In line with the expectations of increasing digitisation and the digital first principles of the REC timely access to and availability of data is anticipated.

In circumstances were a party cannot provide data in the required timescale this should be communicated to the Code Manager as early as possible and, depending on the circumstances, alternate approaches may be required to assess and monitor the relevant retail risk(s) until such data can be provided. This may require application of specific PATs or a greater level of direct assurance testing by the Code Manager until data is provided.

Finally, we would highlight that it is expected that the first major change to the Report Catalogue will relate to CSS go-live and implementation of REC V3.0.

5. HAS CONSIDERATION BEEN MADE FOR THE VOLUME OF REPORTING REQUIRED FROM PARTIES?

We are cognisant of the burden on Parties which is why we have attempted to source much of the data centrally or use pre-existing reports. We would expect Parties to have established efficient repeatable processes to produce regular reports.

6. HOW DO I UPLOAD/ PROVIDE PERFORMANCE ASSURANCE DATA?

A step by step guide, including details of the required permissions, can be found here.

7. CAN I PROVIDE DATA AS MULTIPLE SMALLER FILES/ CAN I COMBINE MORE THAN ONE MONTH'S DATA INTO A SINGLE LARGER FILE?

Data can be submitted as multiple smaller files (for example if you prefer to break down reporting or for some items need to source different elements of your portfolio from different systems). All files should follow the proscribed format and should have unique names (otherwise the portal will see them as replacements of previously submitted files).

Data can also be combined (e.g. if reporting multiple months on initial submission) for all files that contain MPxN level data or a date field (in order for us to break down the file to the relevant performance period).

8. WHAT SHOULD I DO IF I HAVE NO DATA TO SUBMIT/ HOW DO I SUBMIT A NIL RETURN?

Please submit a helpdesk ticket (enquiries@recmanager.co.uk) confirming which specific data items (including PARC ID) you have no data to submit for, with a brief description of why (e.g. not relevant to your customer portfolio) and whether this is open-ended or a temporary circumstance. If temporary, please provide you best estimate of the first performance period you expect to submit data from.

9. DO WE NEED TO SUBMIT REPORTS AT A GROUP LEVEL? WE HAVE ACCEDED WITH MULTIPLE ROLES/ LICENCES. WE WOULD RATHER ONLY HAVE TO SUBMIT A SINGLE REPORT.

Data can be provided at either level, whichever is easier for the party. Parties can choose to have Performance Assurance applied at a group or Party level, per REC Role – this will be notified via the REC Portal. We will continue to keep separate different types of Party in the same group, so if you have Suppliers, MEMs, DNOs or GTs together in a group they need to report on each of these categories of Party separately.

If data is submitted at a group level, then where the option to aggregate Parties for performance assurance has been adopted then data will be analysed as provided.

If the option to aggregate Parties has not been adopted, then data will be split to Party level using MPxN data where possible. For pre-existing (aggregate) files these should be provided at the same level as is currently required.

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ALTERNATIVE DATA COLLECTION

10. CAN PPMIP DATA BE OBTAINED DIRECTLY RATHER THAN VIA SUPPLIERS?

We are in discussion with PPMIPs to explore whether centralising data provision (subject to supplier agreement) would be possible. Note that agreement from all suppliers is required in order for this potential arrangement to be possible.

Further communications were issued to suppliers on 4 October via email to notify Parties to pause development on the PPMIP reports within the Report Catalogue whilst discussions with PPMIPs are ongoing.

11. WHERE POSSIBLE CAN INFORMATION BE OBTAINED FROM A THIRD PARTY TO PROVIDE CONSISTENCY AND LESSEN THE BURDEN ON PARTIES?

We have sought to apply this principle where possible – with a significant portion of data required being sourced through central sources and expected to increase for REC V3.0. If there are specific instances where you believe the data requested is available from a central source we have not identified or is replicated by existing regulatory/compliance reporting please provide us details and we are happy to consider switching to an alternate sourcing option.

12. HAS CONSIDERATION BEEN MADE OF EXISTING REPORTING (INCLUDING E.G TO OFGEM)/ WE FEEL THERE IS OVERLAP WITH EXISTING REPORTING REQUIREMENTS?

Existing reporting has been considered when developing the reporting catalogue insofar as possible. In many cases existing reporting does not provide the level of disaggregation of data required to enable the data driven risk-based approach being applied to REC Performance Assurance.

However, we have sought to leverage existing reporting definitions where possible – for example utilising the same categories of complaints as Ofgem but requesting data at a more granular level. In most cases our expectation is that Parties will already have to obtain the more granular information required before aggregating for existing reporting and hence in essence in many cases we are requesting the underlying data rather than aggregated reports, as discussed more fully in FAQ 19.

We recognise there is a wide variety and range of existing reporting in place and whilst reasonable effort has been made to consider existing reporting if Parties are aware of a reporting item that would fulfil the same requirements as specified and which we are not requested please feel free to contact us and we are happy to investigate further.

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APPLICABILITY OF DATA COLLECTION REQUIREMENTS

13. ARE THESE REQUIREMENTS MANDATORY/ WHAT IS THE LEGAL BASIS?

Provision of data for Performance Assurance is part of the REC Performance Assurance Schedule (section 9). Please refer to the document here for some further information regarding the overview of data processing conducted for Performance Assurance purposes.

14. WILL YOU PROVIDE AN EXPLANATION AS TO WHAT ACTIVITY A DATA ITEM IS USED TO ASSESS?

The Risk Register will detail all Retail Risks and Risk Drivers against which parties are being assessed. The Risk Drivers provide a breakdown of the specific activities/processes that are being assessed using the underlying data.

The Performance Assurance approach being adopted is fundamentally different from previous regimes. We are not requesting one individual report for each Retail Risk, we are requesting a suite of reports to monitor performance of the retail arrangements.

15. IS THERE A VOLUME THRESHOLD BY WHICH A SUPPLY LICENCE HOLDER MAY NOT BE REQUIRED TO SUBMIT DATA?

No, all Parties are required to provide the applicable data, however, note FAQ 25 below. We will update the Report Catalogue guidance to allow for the circumstance where a supply licence holder has a very low number of customers and hence may need to submit 'nil returns' for most data items.

16. WHEN DOES A NEW PARTY NEED TO START TO SUBMIT DATA – ON QUALIFICATION OR ONCE THEY BECOME ACTIVE?

Data will be required once a Party becomes active – e.g. for a supply party starts to acquire customers. Prior to this the 'nil return' guidance should be followed.

17. HOW DID THE PAB ARRIVE AT THE IDENTIFIED RETAIL RISKS AND HOW HAVE THEY BEEN PRIORITISED?

A two-stage process was undertaken by the Code Manager. Firstly, a review of the REC was undertaken, relating key obligations to consumer risks. Separately, a top-down review was also completed, focussing on risks to consumer outcomes and then relating them back to the code. The results of the two approaches were combined and used to derive the complete set of Retail

Risks. The Retail Risks were subject to both SME, PAB review and challenge prior to being voted on (by the PAB) to prioritise.

18. CAN YOU CONFIRM WHICH REPORT CATALOGUE ITEMS ARE APPLICABLE FOR DOMESTIC/ NON-DOMESTIC ONLY PARTIES? SIMILARLY, CAN YOU CONFIRM WHICH ARE ONLY APPLICABLE FOR PARTIES WITH CUSTOMERS ON PREPAYMENT METERS?

We have added two additional columns to the report catalogue showing which items are applicable only to domestic / non-domestic supplier Parties and which are only applicable to prepayment meters.

COMPLAINTS DATA

19. CAN YOU CLARIFY THE SCOPE OF ITEMS 100/ 101?

Report item 100 is a more granular breakdown of complaints related data, as detailed in the catalogue. We have sought to define this using attributes (e.g. category) already utilised for complaints reporting that is produced to Ofgem in order for Parties to leverage existing processes (which we would expect involve aggregating complaints data for the purposes of Ofgem reporting) however this is an additional report that does not represent an existing data provision to Ofgem. Note the scope of this reporting is currently the same customer base as existing Ofgem complaints reporting for suppliers – i.e. relates to domestic and micro-business customers only.

Report item 101 is the pre-existing monthly and quarterly aggregated complaints reports that are already provided to Ofgem and that we are requesting Parties also provide to the REC Code Manager.

20. COULD YOU CONFIRM WHETHER DATA ON ALL COMPLAINTS IS REQUIRED FROM SUPPLIERS, OR JUST RELATING TO ERRONEOUS TRANSFERS?

Given the focus on customer outcomes within the REC definition of Retail Risk we expect that complaints related information will provide insight into a wide range of Risks and Risk Drivers. This was not fully captured in the mapping to the Risk Register in the Catalogue and has been updated.

To provide clarity on the specific complaints to be reported by supplier Parties we have listed out in the Report Catalogue the specific categories (utilising the same categories as existing Ofgem reporting) that should be included.

21. FOR THE DNO COMPLAINTS DATA (ITEM 90) WHAT KIND OF COMPLAINTS FALL IN THE SCOPE? IS IT ANY COMPLAINTS FROM ANY STAKEHOLDER?

All complaints relating to end customer/consumer supply should be included. This is reflected in the current version of the Report Catalogue.

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22. IF A COMPLAINT IS RECEIVED AND CLOSED IN THE SAME MONTH, WOULD WE EXPECT TO REPORT THAT TWIDE IN THE SAME MONTH (ONCE UNDER EACH STATUS)?

It is not necessary to report it twice – please include as a Resolved Complaint – the date information and lack of inclusion in previous reporting will allow us to infer the complaint was opened and resolved in the same month.

23. HOW SHOULD COMPLAINTS THAT APPLY TO MULTIPLE MPXNS BE DISPLAYED WITHIN YOUR REPORTING? WE INTERPRET THAT THE REQUIREMENTS ASK US TO REPORT MULTIPLE ROWS WITH THE SAME COMPLAINT REFRENCE IF IT RELATES TO MULTIPLE METER POINTS.

This is the correct interpretation. As noted in the Report Catalogue these will be counted as a single complaint.

24. FOR REOPENED COMPLAINTS, HOW SHOULD THE DATE OF REOPENING, DATE OF ORIGINAL RESOLUTION OR DATE OF NEW RESOLUTION BE CAPTURED?

For re-opened complaints the date of reopening should be provided as the “Date of Complaint” and the new resolution date be provided as date of resolution once applicable.

25. ARE YOU REQUESTING BOTH THE EXISTING OFGEM REPORTING AND ADDITIONAL COMPLIANTS INFORMATION?

Correct. We are requesting the existing Ofgem reporting given this is already produced and available from Parties. In addition, and in line with our approach of utilising more granular, data we have requested the breakdown of complaints information to input into our risk assessment determinations.

26. THE COMPLAINTS REPORT TO BE COMPLETED BY NETWORKS IS VERY ELECTRICITY BIASED IN PLACES (MPID/ CATEGORY) – COULD YOU CONFIRM IF GAS NETWORKS ARE ALSO REQUIRED TO PROVIDE INFORMATION?

We can confirm that gas networks should also provide data. Based on feedback we have updated the requirements to better reflect both power and gas network operators.

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DATA PROTECTION AND GDPR

27. WHY IS DATA REQUESTED AT AN MPXN LEVEL? WHY CAN'T DATA BE PROVIDED IN AGGREGATE AND THEN DETAIL PROVIDED ON AN 'AS NEEDED' BASIS?

We have requested data at an MPxN level for three main reasons:

- It allows data from various sources to be linked, which we require to perform assurance against various retail risks.
- A core principle of our assurance approach is root-cause analysis, this will be facilitated by access to MPxN level detail.
- To support follow-up (when required) with Parties on specific deviations/exceptions we want to be able to pin-point enquiries rather than asking about exception numbers contained in aggregate reports.

Our data driven, risk assessment approach is consistent with the overall REC Digitisation Strategy and includes a monthly cycle of analytics and risk assessment. An alternative process by which aggregated data is provided and then further detail requested for follow-up would be more time-consuming and drawn-out, given the cycle of assessment; this would likely increase the overall party burden, build in delays and decrease the value derived from the new approach.

28. HAVE GDPR/DATA PROTECTION MATTERS BEEN CONSIDERED IN THE CONTEXT OF OBTAINING MPXN LEVEL DATA?

Data Protection has been considered when developing the Report Catalogue. This has included seeking to minimise data requested (e.g. excluding unnecessary fields from flow data, moving to direct assurance for PSR obligations). In addition, RECCo has completing a DPIA in respect of Performance Assurance data with input from the Code Manager.

All data transfer will be via encrypted methods and data encrypted at rest. Detailed (e.g. MPxN) data will only be available to Code Manager Performance Assurance team members and the Party who submitted the data. Data will be subject to lifecycle management and retention, noting that for some industry processes data will be required to be retained for over a year to allow for end-to-end processes to be assessed.

SPECIFIC DATE ITEMS

29. CAN YOU PROVIDE DETAILS OF THE FORMAT OF THE SMICOP SURVERY/SMIS SUBMISSION TEMPLATE (REPORT 1330)?

Templates are provided on the REC Portal for domestic here and micro-business here. The first submission deadline this item is 1 November 2021.

30. SUPPLIER THEFT FILE – UNCLEAR IF THIS IS IN ADDITION TO THE TRAS SUBMISSION OR IF THE REC WILL BE USING THE SAME SUBMISSION?

This replaces the TRAS submission but uses the same format to minimise disruption.

31. IS THERE ANY ADDITIONAL GUIDANCE AVAILABLE ON THE CONTENT/FORMAT OF EACH REQUIRED DATA ITEM?

Details on the fields and, where applicable, allowable values for each report is included in the Report Catalogue.

As noted in that document all data (where not a pre-existing report and hence already defined) should be provided in pipe or comma separated format.

32. WHAT DATA SHOULD BE INCLUDED IN THE 1440 SUBMISSION? AS A SWITCH CAN WE REQUESTED IN ONE MONTH BUT SUPPLY LOST IN ANOTHER, IT IS UNCLEAR HOW IN WHICH MONTH THE LOSS SHOULD BE REPORTED.

The guidance within the Report Catalogue has been updated to ask for data to be provided only once the final bill has been issued. The date the switch was requested has also been added to the data template.

33. THE PREPAYMENT FLOW DATA REQUESTS (ITEMS 600-650) CONTAIN A LARGE NUMBER OF FIELDS, ARE ALL OF THESE REQUIRED?

We have included in the request a number of fields that are currently optional but are present in the data flow. In preparing the request we removed all personal data items included in the flow but not required but retained several other fields that, whilst not required currently for risk assessment, may become relevant in the future. To avoid future changes required by Parties we have included these in the specification, however as noted these are currently optional and can be excluded if preferred.

34. DO I NEED TO PROVIDE THE THEFT OUTCOME AND CONSUMPTION FILES?

No. At this point in time, we only require the outcome files – these are item 1340 in the report catalogue.

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QUESTIONS AND FURTHER SUPPORT

35. HOW ARE CHANGES TO THE REPORT CATALOGUE MANAGED? DO THEY GO THROUGH THE REC CHANGE PROCESS?

As outlined in the REC Baseline Statement, the Report Catalogue is classed as a Category 3 document under the REC and is therefore subject to the Category 3 change process.

The Category 3 change process means that the PAB are consulted and have oversight of any changes to the Report Catalogue. As part of a Category 3 Change Proposal being raised on the REC Portal, a description must be given for the reason for the change, to give industry visibility of the proposed updates. There is also the opportunity for industry to engage with the Code Manager if they have any questions on the proposal.

36. IS IT KNOWN WHETHER THE EXISTING PARMS REPORTING UNDER ELEXON GOVERNANCE WILL PHASE OUT OR STOP COMPLETELY TO BE REPLACED UNDER THE REC PAB REPORTING CATALOGUE?

We have been working closely with Elexon on the development of the REC Performance Assurance regime to manage transition and any overlap.

They have confirmed that there is a BSC PAB paper being progressed that is proposing:

‘Switching off participant-reported PARMS Serials (excluding SP04). This Change Proposal will remove the requirement for Data Collectors (DCs) and Meter Operator Agents (MOAs) to submit the impacted PARMS Serials. This CP will go through the normal Change process, including consultation, with a view to implement in Feb 2022.

Elexon will be working with the BSC PAB and with industry to determine the appropriate next steps in terms of Supplier Charges. BSC Modification P406 suspended Supplier Charge Serials SP08 and SP04 from the March 2020 Performance Assurance Reporting and Monitoring System (PARMS) reporting period as a consequence of Covd-19 restrictions. The decision to reinstate Supplier Charges will be made be made by the BSC Panel at a date yet to be determined.

37. HOW CAN I RAISE ADDITIONAL QUESTIONS/ GET SUPPORT FOR FURTHER QUESTIONS I HAVE ON THE REPORT CATALOGUE?

Please raise via your Operational Account Manager or submit a helpdesk ticket on the REC Portal (enquiries@recmanager.co.uk).