RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0118 – REVIEW OF SCHEDULE 12 AND PROCESSES TO MANAGE ACCESS TO DATA

On 08 September 2023 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0118.

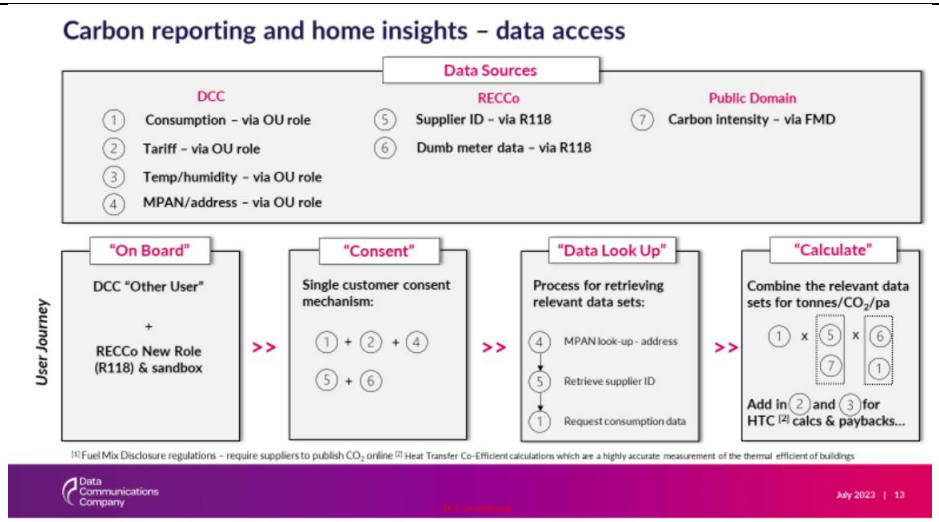
The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

DOCUMENT VERSION	1.0
RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	06/10/2023
RESPONSIBLE COMMITTEE	CHANGE PANEL
LEAD ANALYST	ELISE HANDY

DATE CONSULTATION ISSUED	08/09/2023
RESPONSE DEADLINE	22/09/2023

Question 1:	Do you agree the Proposed Solution resolves the problem statement? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
GB Group (Non-REC Party – TPI Service Provider)	Yes. There is a growing number of use-cases that would benefit from easier access to meter-point data including the installations of EV-charging points, heat-pumps and generating infrastructures such as solar panels, and wind and water turbines for domestic or small business use. Simplifying the process to add new cases for the controlled use of the data either directly or through existing TPI-Service Providers, will realise benefits to organisations providing these services and to the end-consumers.	Noted, thank you.
National Grid Electricity Distribution (NGED) (DNO)	Yes we agree that the proposed solution resolves the problem statement.	Noted, thank you.
Scottish Power (Supplier)	Yes, and we agree that the new process will offer flexibility to support industry whilst still maintaining effective controls over the use of consumer data.	Noted, thank you.
Xoserve (Service Provider)	We are generally supportive of this change as a full REC Change to amend the DAM was excessive governance but ensuring that the correct change path is followed so that the correct target audience is able to see the consultation and to respond is important.	Noted, thank you. We will take on board your comments for how we engage with industry.
Data Communications Company (DCC) (Service Provider)	DCC strongly supports these changes, arguing that the processes that grant data access should be simplified and adaptable so that valid data use cases can be addressed quickly. The DCC is working with a number of organisations attempting to access	Noted, thank you.

	granular smart meter data to unlock public good use cases, but who are currently unable to as a result of today's data access requirements. An example is the Perseus project, which seeks to automate accurate energy and carbon reporting for UK SMEs. Doing so will ensure that high resolution reconciled and verified data can support energy efficiency initiatives, and reduce risks to facilitate, target, measure and report on green lending. To achieve these objectives, it's essential that (with consent) multiple smart data sources can be easily accessed by Perseus and other individual financial institutions' (through either the DCC 'Other User' route, or new user categories of the REC). This includes access to the following smart meter data sources (covering both domestic and non-domestic meters): 1. Supplier ID data (allowing identification of tariff and carbon intensity data [publicly available]) 2. Dumb meter data 3. MPAN look up service (identified as a more accessible route than through the DDC) We have included a diagram below to explain the value in how gaining access to these specific data sets can help support a number of use cases.	

Question 2:	Do you believe that the new process is appropriately outlined within the legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
GB Group (Non-REC Party – TPI Service Provider)	. Yes.	Noted, thank you.
National Grid Electricity Distribution (NGED) (DNO)	The list of authorised purpose is now in the new Enquiry Service User Categories however, Schedule 12 only refers to the data access matrix and does not reference this new document. We feel this reference/hyperlink should be included. We have Questions around the New Category 3 document:	Thanks for your comments. Following legal advice, it was suggested that the Enquiry Service User Category document forms part of the Data Access Matrix itself rather than sitting

	Is there any cross reference to the new Category 3 Document? Is there any cross reference in the DAM to this document? This document has not been included on the REC Baseline Statement. Are there changes being made to the Data Access Matrix – the REC Baseline Statement indicates changes to the Electricity Data Access Matrix and the Gas Data Access Matrix? If so where is the red-lining for these changes?	separately. Therefore, the document will no longer be referenced within Schedule 12 or in the REC Baseline Statement. There are no changes to the Data Access Matrices themselves, however, the REC Baseline Statement will be updated to reflect the new categorisation of these documents.
Scottish Power (Supplier)	yes	Noted, thank you.
Xoserve (Service Provider)	We think that the changes to the legal text could be more appropriately constructed. Please see example below, the content appears to repeat itself and responsibilities of the code manage or RECCo are unclear. 7.4. Each application will be assessed by the Code Manager in accordance with a process ~~against criteria~~ approved by the REC Board and published on the REC Portal. This may include consultation with stakeholders. The Code Manager shall, based on its assessment of the criteria, decide if the application should be approved or rejected ~~and~~ recommend to the REC PAB (with supporting rationale) whether the application should be approved or rejected and arrange for the REC PAB to determine whether to approve the application. ~~advise~~ The Code Manager will inform the applicant regarding the outcome of the application ~~assessment~~, including the REC PAB's rationale for any rejection. The criteria may differ for each ~~Enquiry Service User Category~~ application, and shall (as a minimum) cover:	Thank you for your suggestions to the legal text. The Code Manager has reviewed the suggestion on construction and has decided to keep the drafting as current which has been subject to legal review and approval. We have noted your comments on references to paragraph 5 in Section 11. As Section 5.1 states 'Each Enquiry Service User shall only access data in accordance with the terms of use set in this REC schedule' amending the text to reference the DAM, Paragraph 4.6 and 13 only would not be sufficient.

	Also we believe **any** reference to paragraph 5 in Section 11 should be amended so that it doesn't reference paragraph 5 but instead references the DAM; Paragraph 4.6 and 13. Please see example below – (please note this is not limited to 11.1) **11 Terms of Use** 11.1. Each Enquiry Service User shall (and shall ensure that its Authorised Persons) only use the Enquiry Services for the purpose permitted in accordance with Paragraph 5.	
Data Communications Company (DCC) (Service Provider)	In Schedule 12 – Data Access it now states in paragraph 4.3: "The Enquiry Service User Categories shall be maintained in the Data Access Matrix". Should this state the Enquiry Service User Categories shall be maintained in the "Enquiry Service User Category document"? If not, then is the purpose of the Enquiry Service User Category document to avoid needing to update multiple documents when there is a new User Category?	Thanks for your comments. Following legal advice, it was suggested that the Enquiry Service User Category document forms part of the Data Access Matrix itself rather than sitting separately. Therefore, the document will no longer be referenced within Schedule 12 or in the REC Baseline Statement.

Question 3:	Do you believe that the proposed process provides the appropriate controls for data access?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
GB Group (Non-REC Party – TPI Service Provider)	Yes.	Noted, thank you.

National Grid Electricity Distribution (NGED) (DNO)	Yes we believe that the proposed process provides the appropriate controls for data access.	Noted, thank you.
Scottish Power (Supplier)	Yes	Noted, thank you.
Xoserve (Service Provider)	Yes – Only provided the correct people are aware and are reviewing the appropriate changes. The current C3 process is aimed at operational and technical people. We are concerned that adopting this process will involve Regs and Legal people who don't necessarily review the documents at the moment.	Thanks for your comments. We will take on board your comments for how we engage with industry.
Data Communications Company (DCC) (Service Provider)	We agree and hope the application process for data access will be quicker once R0118 is implemented.	Noted, thank you.

Question 4:	Do you agree with the proposed implementation date and approach? If no, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
GB Group (Non-REC Party – TPI Service Provider)	Yes.	Noted, thank you.
National Grid Electricity Distribution (NGED) (DNO)	Yes we agree with the proposed implementation date and approach.	Noted, thank you.

Scottish Power (Supplier)	Yes	Noted, thank you.
Xoserve (Service Provider)	We agree with the proposed implementation date and approach.	Noted, thank you.
Data Communications Company (DCC) (Service Provider)	Yes, DCC agree with the proposed implementation data and approach.	Noted, thank you.

Question 5:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (NGED) (DNO)	-	-
Scottish Power (Supplier)	No	-
Xoserve (Service Provider)	As a Class 3 document change - what process does this go through and what visibility is there of these changes to industry parties. We are concerned that the C3 Change Process has been designed for more technical documentation changes - and whether this process will require parties to monitor these that otherwise wouldn't. How will this be communicated to parties? Not all parties actively watch the portal or read the newsletter. Is there a risk that we are now conflating two distinct processes into one and causing issues for the recipients of these changes?	Thanks for highlighting your concerns. Category 3 change communications are managed through the weekly Change Bulletin and in some cases, the general REC bulletins. Any associated Consultations will be communicated in the usual way and within the same section on the Portal as any R change. We will continue to monitor engagement with this new process and seek to ensure there is rounded and proportionate visibility of each

	We note in advance of the PAB approval – Service Providers will be consulted for Impact assessment. Following approval normal league times will be observed including release planning and instruction from the relevant parties.	access request and action any improvements identified for communications. Engagement and communications may be done on a case-by-case basis and may involve seeking input from more than one expert group.
Data Communications Company (DCC) (Service Provider)	1) It would be useful for an explanation of each Data Item to be provided in a supporting document to assist GES and EES applicants. Note that User Guides exist but they don't cover each Data Item and so having something to this effect would ultimately save time during the application process. 2) The Data Access Matrices could also warrant a review and updates as we are aware that, following discussions with the EES Provider for example, that there are Electricity Data Items available to parties that do not currently appear within the Electricity DAM.	Thanks for your comments. There has been a RECCo-led project on classification-based data access. One of the outputs of this is a detailed DAM which categorises each Data item and provides a clear definition. This Change Proposal is expected to be raised shortly where this new DAM will be available to view.