RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0154 - PERFORMANCE ASSURANCE REPORT CATALOGUE V5.1

On 05 01 2024 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0154.

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	16/02/2024
RESPONSIBLE COMMITTEE	Performance Assurance Board (PAB)
LEAD ANALYST	Lydia Bentley

DATE CONSULTATION ISSUED	05/01/2024
RESPONSE DEADLINE	26/01/2024

Question 1:	Do you agree the Proposed Solution resolves the problem statement? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy Ltd Non-Confidential Energy Supplier	We agree that the changes to the Theft reporting specifications would be beneficial, however there are further amendments that would be beneficial, these have been noted in answer to question 7.	Thank you for your response. We have noted your suggestions in Q7.
Northern Powergrid Non-Confidential Distribution Network Operator	We agree the revisions to the Performance Assurance Report Catalogue, and agree that this achieves the objectives and resolves the problem statement.	Thank you for your response.
E.ON Non-Confidential Energy Supplier	We agree that the Performance Assurance Report Catalogue (PARC) has been subject to an annual review and has followed the correct process. We are pleased that the PAB is moving to remove reports and data items that are no longer required but we do think that the Supplier theft file needs a fundamental overhaul. The data requested in the theft file has largely remained unchanged for several years and is information that Experian requested when they ran the TRAS. We would question if all of the information is still required and if so why it is still being requested - an example would be the complete or partial bypass fields. We would like to see it fully reviewed and are very happy to support on this activity which would also need to encompass the format and validation rules as we understand many parties are having issues with loading the file. As we will also mention in our response to the proposed Theft Methodolgoy changes, suppliers reporting only on the number of confirmed thefts is not recognising the significant amount of work that	Thank you for your response. We appreciate your feedback, and we will consider it and share it with RECCo so it can be incorporated into wider theft strategy and TDIS changes.

Question 1:	Do you agree the Proposed Solution resolves the problem statement? If not, please provide rationale.	
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	suppliers are carrying out. We would propose that REC also collect data on the number of desktop assessments completed and field visits carried out. This could provide valuable insight into how the methodology could be adjusted to incentivise suppliers further. We would also recommend that included in the submission is the smart/non smart split that REC proposes to introduce into the methodology. This would enable REC to collect data which it can analyse rather than setting suppliers an arbitrary target.	
SSE Energy Supply Ltd Non-Confidential Energy Supplier	Yes.	Thank you for your response.

Question 2:	Do you agree the proposed updates to the PARC are supportive of performance assurance for REC Parties? If no, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy Ltd Non-Confidential Energy Supplier	Yes, we believe these changes will be beneficial.	Thank you for your response.
Northern Powergrid Non-Confidential Distribution Network Operator	Yes, we agree with the changes – specially commenting on changes to the Electricity Network Operator Complaints Data removal as a positive change.	Thank you for your response.
E.ON Non-Confidential Energy Supplier	Yes we agree	Thank you for your response.
SSE Energy Supply Ltd Non-Confidential Energy Supplier	The proposed changes for the commercial 1341 theft report are not required as the incentive pots remain the same, should any changes to the incentive pots be made, these changes should be implemented at that stage. We do not believe the 3-character validation values to be used for the incentive pots are well sign posted.	Thank you for your response. We will take your feedback onboard and remove the proposed incentive pot field from the 1341 Commercial file specification. We will consider how we can make the validation rule clearer.

Question 3:	As an Energy Supplier, do you believe you will be able to make the changes proposed to the Energy Theft Outcome file (ref. 1341) ahead of the first submission for the 2024/25 TDIS Reporting Year, due on the 3 June 2024? If no, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy Ltd Non-Confidential Energy Supplier	Yes, we will be able to make the required changes.	Thank you for your response.
Northern Powergrid Non-Confidential Distribution Network Operator	n/a - answer applicable to Energy Suppliers	Thank you for your response.
E.ON Non-Confidential Energy Supplier	Yes, we believe we will be able to make IT systems changes required in time for the first submission.	Thank you for your response.
SSE Energy Supply Ltd Non-Confidential Energy Supplier	As a non-domestic supplier, we believe the changes are minimal, therefore we will be able to meet the implementation date.	Thank you for your response.

Question 4:	We are considering an additional change to remove the fixed width version of the Energy Theft Outcome file (ref. 1341) for the 2024/25 TDIS Scheme Year to facilitate more effective file validation and further simplify the Energy Theft submission requirements. Do you believe this would cause you a significant impact? If so, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy Ltd Non-Confidential Energy Supplier	No, this would not have a significant impact on us.	Thank you for your response.
Northern Powergrid Non-Confidential Distribution Network Operator	n/a - answer applicable to Energy Suppliers	Thank you for your response.
E.ON Non-Confidential Energy Supplier	We support this and will not cause any impact to our organisation.	Thank you for your response.
SSE Energy Supply Ltd Non-Confidential Energy Supplier	We welcome any simplification to the validation as this will reduce the resource burden on attempts to submit the report each month and therefore will have a positive outcome	Thank you for your response.

Question 5:	Do you believe that there are any other data sources not included in the PARC that we should be using? If so, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy Ltd Non-Confidential Energy Supplier	No, not that we are aware of currently. We will continue to engage with REC Performance assurance where any efficiencies are identified though.	Thank you for your response.
Northern Powergrid Non-Confidential Distribution Network Operator	No Comment	Thank you for your response.
E.ON Non-Confidential Energy Supplier	As per our answer to question 1, we would advocate for some additional data to be included in the Supplier theft file. As an organisation, we do a lot of activity to proactively identify theft by conducting detailed desk top analysis that does not often result into a site visit and therefore does not make it on to the TRAS report. We then carry out significant numbers of site visits that do not result in the identification of a confirmed theft. We would support discussions on how this activity can be included in the report, submitted in easy user format.	Thank you for your feedback. As per above, further changes to the theft file data specification will be considered as part of the wider changes to the theft strategy and the TDIS.
SSE Energy Supply Ltd Non-Confidential Energy Supplier	We do not believe there are other data sources required to be included, at this time.	Thank you for your response.

Question 6:	Do you agree with the proposed implementation date and approach? If no, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy Ltd Non-Confidential Energy Supplier	Yes, we agree with the implementation date and aaproach.	Thank you for your response.
Northern Powergrid Non-Confidential Distribution Network Operator	Yes, we agree with the implementation date.	Thank you for your response.
E.ON Non-Confidential Energy Supplier	Yes we are happy to work to this date	Thank you for your response.
SSE Energy Supply Ltd Non-Confidential Energy Supplier	Yes	Thank you for your response.

Question 7:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy Ltd Non-Confidential Energy Supplier	Yes, we would like to suggest that a further amendment is made to the PARC. It would be beneficial if alongside each of the field specifications it could be detailed which column each filed is expected to be populated within the CSV. Currently the portal validation error messaging specifies the row and column a data error has been found, but the column does not translate to the column within the CSV, it is N+1. So making the above amendment to the PARC further clarifies the reporting requirements for parties.	Thank you for your feedback. We will accommodate this change and agree that it would be beneficial to Parties.
Northern Powergrid Non-Confidential Distribution Network Operator	No Comment	Thank you for your response.
E.ON Non-Confidential Energy Supplier	We would support a full review of individual data items required and formatting within the supplier theft file. For example, right justified, use of upper case and lower case. With regards to file validation, we would appreciate improved feedback on files that fail to upload. It is significant resource to do repeated submissions. We would also recommend that entries on the report are shortened i.e. rather than confirmed we put “C”	Thank you for your feedback. We appreciate it can be frustrating to only see the first error in the file, this had already been identified as an opportunity for enhancement of Portal functionality and will be subject to prioritisation within the continuous improvement process. To confirm on your final point, it is only the single character that is entered on the file (i.e.

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		"C" as per your example). We can however make this clearer in the PARC.
SSE Energy Supply Ltd Non-Confidential Energy Supplier	On the new version of the commercial 1341 template – Under the investigation block - The crime reference is no longer required therefore we believe this should be removed.	Thanks for your feedback. We are keeping the field in for the 2024-25 Reporting Year because it may become a mandated field in future reporting years.