RETAIL ENERGY CODE

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CHANGE PROPOSAL FORM (COPY)

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1 PERSONAL DETAILS

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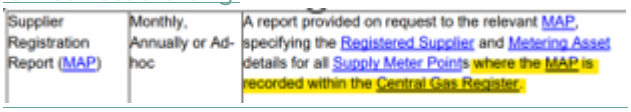
2 CHANGE PROPOSAL SUMMARY

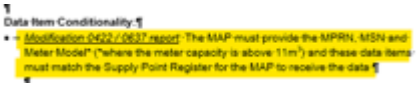
CHANGE PROPOSAL TITLE *(Mandatory)*	Amendment to the 'Supplier Registration Report (MAP)' report methodology
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	As part of the services within the Gas Enquiry Service the MAP receives two reports that are described in this manner in the GES Service Definition (v1.2).

Supplier Registration Report (MAP)	Monthly, Annually or Ad-hoc	A report provided on request to the relevant MAP, specifying the Registered Supplier and Metering Asset details for all Supply Meter Points where the MAP is recorded within the Central Gas Register.
Portfolio Data (MAP)	Monthly	A report provided on request to the relevant MAP detailing Supply Meter Point and Metering Asset details for all Supply Meter Points where the MAP is recorded within the Central Gas Register.

Figure 1: GES Service Definition v1.2 Extract

Both reports are described as having to have the MAP recorded in the Central Gas Register (highlighted).
Following a query into the report methodology initiated by the CDSP as part of their reporting checks it was identified that reports were being issued to MAPs

	that contained Supply Meter Points that did not have the requesting MAP recorded in the UK Link system as the MAP for that Supply Meter Point. The Supplier Registration Report was designed to enable MAPs to provide their portfolio of Supply Meter Points along with Meter Serial Number and Model Details. Provided the details provided by the MAP matched the UK Link Supply Point Register the CDSP would provide details to that MAP of the Registered Supplier at the Supply Meter Point. As this report was originally developed in 2013 there was no intention to check whether the MP was recorded at the Supply Meter Point in UK Link systems – as the MAP was not recorded in UK Link at this time. Following investigation into the history of this report, through the Modifications that initiated the report and subsequently amended the governance into the Data Permissions Matrix (UNC Modifications 0422; 0637S; 0684S; 0697VS) and then subsequent migration to the REC,we can find no evidence that there was any intention that the report methodology was intended to be changed at the point that the GES Services migrated to REC. Consequently we conclude that the highlighted text in the GES Service Definition is incorrect drafting.  Supplier Registration Report (MAP) | Monthly, Annually or Ad-hoc | A report provided on request to the relevant MAP, specifying the Registered Supplier and Metering Asset details for all Supply Meter Points where the MAP is recorded within the Central Gas Register. Figure 2 As part of this change, it is proposed that the documentation related to this report be assessed and amended as necessary to remove errors.
WHAT IMPACT IS THIS HAVING? *(Mandatory)*	As a consequence of the risk of non-conformance with the specification of the report that could have been releasing data that it should not have been, the 'Supplier Registration Report (MAP)' report was amended as a precaution to only provide this where the MAP was recorded against the Supply Meter Point in the Supply Point Register in accordance with the statement highlighted above. We consider that the change made to report functionality in light of the potential non-compliance was the right course of action in the short term. Given our conclusion that the 'non-compliance' was caused by erroneous drafting of the GES Service Definition we have obtained confirmation from RECCo that we can revert to the original report methodology and remove the check that the MAP is appointed in the UK Link Supply Point Register. This change will remove the erroneous drafting.
WHAT OUTCOMES DO YOU CONSIDER ARE NEEDED TO	CDSP have agreed to raise a REC Change that will look to resolve the inconsistencies in the following documents: - GES Service Definition – Amend 'Supplier Registration Report (MAP)' Report text to state: 'A report provided on request to the relevant MAP detailing the Supply Meter Point and Metering Asset details for all Supply

ACHIEVE AN EFFECTIVE SOLUTION? *(Mandatory)*	Meter Points where the MAP meets the "Meter Point Request Information" criteria". - Data Access Matrix - Assess the references to the Community view in light of the ["Meter Point Request Information"] criteria, and potentially apply 'CC06' solely to this column. Note: this assessment will also need to consider other MAP Services (i.e. the Meter Asset Enquiry API) and the extent to which this information is provided based on record of the MAP Id in UK Link systems. This change will also consider the population of this column. - GES Report Technical Specification – 'Supplier Registration Report (MAP)' to ensure that the specification reflects the methodology for report production.
IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE CHANGE PROPOSAL THAT WOULD BE USEFUL? *(Optional)*	This 'Supplier Registration Report (MAP)' has been provisioned to Meter Asset Providers since the implementation of UNC Modification 0422 on 1st April 2013. The Modification predates the recording of the Meter Asset Provider in the UK Link system, therefore the entitlement to data related to a given Supply Meter Point details was determined by the provision of "Meter Point Request Information" (UNC TPD V 5.16.2) asset by the Meter Asset Provider. Where this information matched the Supply Point Register then the information would be provided. This information was: Meter Point Reference Number; Meter Serial Number and Model Name. UNC TPD V5.16 was amended in Modification 0637S – which amended the Meter Point Request Information to mean that the Model detail was only validated on meters with a capacity greater than 11m^3. UNC Modification 0684S added the Meter Asset Provider to the Data Permissions Matrix (and the DPM Conditionality Document) from 28th June 2019. The above text endured in UNC TPD V5.16 – i.e. the determination of the provision of information to the MAP was based on the Meter Point Request Information. UNC Modification 0697VS rationalised the UNC in light of the DPM. Where a party's access to data was governed by the DPM, then the detail of the release of data was removed from the UNC itself. The DPM Conditionality Document was amended to state:  The legal text related to MAPs was as follows prior to 0697VS being implemented. 697VS removed the following text (note: emphasis added to show 'Meter Point Request Information' and the outcome where this matched, also note this text is from David Addison annotated text to the legal text provider and is NOT the formal text extract from 2020):

5.16·Disclosure·of·MAP·Information·(Annex·V-9)·¶

5.16.1·For·the·purposes·of·this·paragraph·5.16,·"Meter·Asset·Provider"·shall·mean·the·provider·of·the·Supply·Meter,·not·having·any·responsibility·for·the·maintenance·of·such·Supply·Meter;·and·"MAP"·shall·be·construed·accordingly.·¶

5.16.2·For·the·purposes·of·this·paragraph·5.16,·"Meter·Point·Request·Information"·shall·include·the·following·information·in·respect·of·each·Supply·Meter·Point:·¶

(a)·meter·point·reference·number;·¶

(b)·meter·serial·number;·and·¶

(c)·meter·model·where·the·meter·capacity·is·above·11m3.·¶

5.16.3·For·the·purposes·of·this·paragraph·5.16,·"Meter·Point·Information"·shall·mean·the·information·as·detailed·in·Annex·V-9.·¶

5.16.4·Subject·to·paragraphs·5.16.6·and·5.16.7·below,·where·the·CDSP·is·requested·by·a·MAP·to·provide·information·in·respect·of·a·given·Supply·Meter·Point·and·provided·the·MAP·notifies·the·CDSP·of·the·Meter·Point·Request·Information·for·each·relevant·Supply·Meter·Point·comprised·within·such·Supply·Point,·then,·subject·to·paragraph·5.16.5,·any·such·request·shall·be·regarded·as·made·on·behalf·of·the·Registered·User·and·the·CDSP·is·(pursuant·to·the·DSC)·authorised·by·such·Registered·User·to·disclose·the·Meter·Point·Information·to·the·MAP·for·each·Supply·Meter·Point·comprised·in·the·Supply·Point·Registration·for·such·Supply·Point.·¶

5.16.5·Meter·Point·Information·shall·only·be·provided·in·respect·of·a·given·Supply·Meter·Point·where·the·Meter·Point·Request·Information·matches·the·records·on·the·Supply·Point·Registration.·Where·the·Meter·Point·Request·Information·fails·to·match·the·records·on·the·Supply·Point·Registration·the·CDSP·shall:·¶

(a)·provide·a·response·to·the·MAP·indicating·that·the·Meter·Point·Request·Information·supplied·by·the·MAP·has·failed·to·match·the·records·on·the·Supply·Point·Registration;·and·¶

(b)·provide·no·further·information·in·respect·of·this·Supply·Meter·Point.¶

Figure 4: UNC TPD V 5.16 Extract

Note: within the introduction to Mod 0697VS presented in June 2019 to the UNC distribution Workgroup, it was explicitly stated that the UNC TPD V 5.16 principle should endure:
https://www.gasgovernance.co.uk/sites/default/files/ggf/2019-06/PreMod%20-%20V5%20DPM%20Enhancement%20v1a%2020190620.pdf

Slide 7:

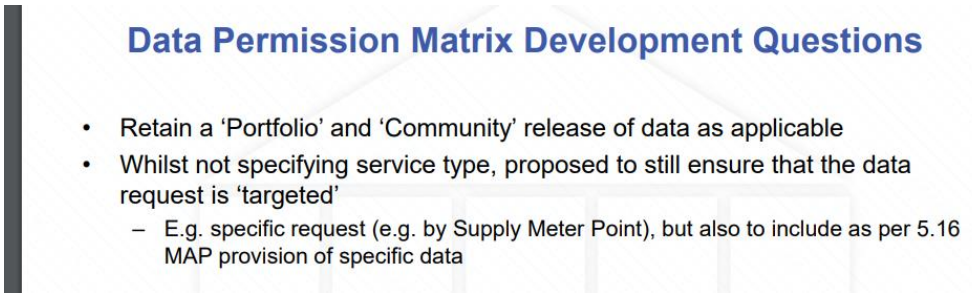


Figure 5: UNC Mod 0697VS Pre-Mod Slides

The following text was inserted into the DPM Conditionality document related to the provision of data to the Meter Asset Provider (highlights added). A full version is shown in the appendix of this section (note: the qualification to source being a version used for drafting):

The data items migrated across to the Data Access Matrix at REC v3 implementation when the Gas Enquiry Service was managed under the REC. The DAM shows the following conditions:

CC06	Meter Asset Provider	• All twin stream Supply Meter Points are excluded This is related to the API service only • Any Shared Supply Meter Points are excluded This is related to the API service only • Any Non-Domestic Supply Meter Points are excluded This is related to Portfolio services only and the determination of Domestic Supply Meter Points will be carried out by using the Market Sector Code held within the Supply Point Register. The MAP must provide the MPRN, MSN and Meter Model* (*where the meter capacity is above 11m3) and these data items must match the Supply Point Register for the MAP to receive the data

3 CONSUMER IMPACTS

WHICH CONSUMER TYPES WILL BE IMPACTED BY THIS CHANGE PROPOSAL? *(Mandatory)*	☐ Electricity ☒ Gas ☒ Domestic Prepayment ☒ Domestic Credit ☒ Microbusiness ☒ Small and Medium Enterprise (SME) ☒ Industrial and Commercial (I&C) ☐ Other (please specify in the Additional information box below)
WHAT IMPACT WILL THIS CHANGE PROPOSAL HAVE FOR THESE CONSUMERS? *(Mandatory)*	☐ Switching experience ☒ Billing accuracy ☐ Trust and confidence ☐ Safety ☐ Security of supply ☐ Ability to pay ☐ On site experience ☐ Other (please provide details in the Additional information box below)
ADDITIONAL INFORMATION *(Optional)*	UNC Mod 0422 originally was implemented to enable MAP billing accuracy to Suppliers.

4 CODE IMPACTS

RETAIL ENERGY CODE

Does this Issue relate to or impact:

THE REC OR REC SCHEDULES? *(Optional)*	☐ Main Body ☐ Interpretations and Definitions Schedule ☐ Transition Schedule ☐ Accession Agreement ☐ Company Governance Schedule ☐ Change Management Schedule ☐ Performance Assurance Schedule ☐ Qualification and Maintenance Schedule ☐ Market Exit Schedule ☐ Charging Methodology Schedule ☐ Prepayment Arrangements Schedule ☐ Central Switching Service Schedule ☐ Data Access Schedule ☐ Energy Theft Reduction Schedule ☐ Transfer of Consumer Data Schedule ☐ Metering Operations Schedule ☐ Metering Accreditation Schedule ☐ Secure Data Exchange Schedule ☐ Green Deal Arrangements Schedule ☐ Registration Services Schedule ☐ Related Metering Points Schedule ☐ Address Management Schedule ☐ Switching Data Management Schedule ☐ RMP Lifecycle Schedule ☐ Switching Service Management Schedule ☐ Resolution of Consumer Facing Switching and Billing Issues Schedule ☐ SPAA Transition Schedule ☐ MRA Transition Schedule ☐ Unbilled Energy Code of Practice ☐ Consolidated Metering Code of Practice (CoMCoP) ☐ Change Panel Terms of Reference ☐ Performance Assurance Board Terms of Reference
ADDITIONAL INFORMATION *(Optional)*	

THE DATA SPECIFICATION? *(Optional)*	☐ Data Item Catalogue ☐ Market Message Catalogue ☒ Data Access Matrix ☐ Standards Definition
ADDITIONAL INFORMATION *(Optional)*	

CENTRAL SYSTEMS OR REC SERVICES? *(Optional)*	☐ Electricity Enquiry Service ☐ Central Data Service Provider Further Services ☐ Secure Data Exchange Service ☐ Green Deal Central Charging Database ☐ Central Switching Service (CSS) ☐ CSS Certificate Authority ☐ Switching Operator ☐ Gas Retail Data Service ☐ Electricity Retail Data Service ☒ Gas Enquiry Service ☐ Energy Theft Tip Off Service (ETTOS)
ADDITIONAL INFORMATION *(Optional)*	This will affect the Gas Enquiry Service Definition. It is expected that following reversal of the reporting change that there will be no functional impacts.

REC PARTIES AND/OR MARKET PARTICIPANTS? *(Optional)*	☐ Energy Suppliers ☐ Distribution Network Operators ☐ Gas Transporters ☐ Metering Equipment Managers ☐ DCC ☐ Shippers ☐ Data Collectors ☐ Data Aggregators ☐ Green Deal Providers ☐ Green Deal Finance Parties ☒ Meter Asset Providers ☐ AMR Service Providers ☐ EES Users

	☐ GES Users ☐ GDCC Users ☐ Other (please provide details in the Additional Information box)
ADDITIONAL INFORMATION *(Optional)*	CDSP

OTHER INDUSTRY CODES? *(Optional)*	☐ BSC ☐ DCUSA ☐ SEC ☐ UNC ☐ IGT UNC
ADDITIONAL INFORMATION *(Optional)*	This does not explicitly impact any other Codes following migration of the report into REC from UNC and IGT UNC.

DOES THIS CHANGE PROPOSAL IMPACT A SIGNIFICANT CODE REVIEW? *(Optional)*	No.
ADDITIONAL INFORMATION *(Optional)*	

5 CHANGE PROGRESSION

DO YOU BELIEVE THIS CHANGE PROPOSAL MEETS THE CRITERIA FOR 'URGENCY' AND SHOULD BE PROGRESSED UNDER AN URGENT TIMETABLE?	No

IF SO, PLEASE PROVIDE JUSTIFICATION? *(Optional)*	
ARE THERE ANY REQUIRED TIMESCALES FOR THE DEVELOPMENT OR IMPLEMENTATION OF THIS CHANGE PROPOSAL? *(Optional)*	No
ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THE CHANGE PROPOSAL WHICH MAY IMPACT ITS PRIORITY OR PROGRESSION TIMETABLE? *(Optional)*	None identified
DOES THIS CHANGE PROPOSAL RELATE TO AN EXISTING OR PREVIOUS CHANGE PROPOSAL? *(Optional)*	No

6 ATTACHMENTS

ATTACH/PROVIDE ANY SUPPORTING DOCUMENTS TO BE SUBMITTED WITH THE FORM	