RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0054 – EES ACCESS FOR VIRTUAL LEAD PARTIES

On 02 September 2022 the Code Manager issued a Consultation to industry to seek feedback on the Preliminary Change Report for R0054. We received two full responses as well as an email with comments from Elexon as BSC Code Administrator.

The purpose of this document is to consolidate the responses as well as answer any questions raised within those responses.

DOCUMENT VERSION	1.0
DATE ISSUED	14/10/2022
RESPONSIBLE COMMITTEE	TECHNICAL EXPERT PANEL
LEAD ANALYST	George Barnes

DATE CONSULTATION ISSUED	02/09/2022
RESPONSE DEADLINE	16/09/2022

QUESTION 1	RESPONDENT DETAILS	Do you agree the Proposed solution resolves the problem statement? If not, please provide rationale.	CODE MANAGER COMMENTS
Do you agree the Proposed solution resolves the problem statement? If not, please provide rationale.	Northern Powergrid (DNO)	Yes	Noted
	Western Power Distribution (DNO)	Yes, we agree the proposed solution resolves the problem.	
	Utilita Energy Limited (Supplier)	Yes	

QUESTION 2	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
Do you agree with the proposed legal text? If not, please provide rationale.	Northern Powergrid (DNO)	Yes	Noted
	Western Power Distribution (DNO)	Yes, we agree with the proposed legal text.	
	Utilita Energy Limited (Supplier)	Yes	
	Balancing and Settlement Code (BSC)	Response by email regarding legal text for the new definition of Market Role.	Based off of these comments the wording of the legal text has been amended for the Final Change Report.

QUESTION 3	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
Do you agree the proposed updates to the Data Access Matrix reflect the correct level of access for Virtual Lead Parties? If no, please provide rationale.	Northern Powergrid (DNO)	Yes	Noted
	Utilita Energy Limited (Supplier)	Yes, provided VLP's are following all the necessary data protection rules already in place.	VLPs will be held to the same requirements for data protection as other EES User.
	Western Power Distribution (DNO)	Whilst we are comfortable with VLP having access to EES and agree with the proposed updates to the Data Access Matrix, we have concerns if R0022 Amendment to REC Data Access Matrix is not implemented as scheduled and the VLP had access to the following additional data items: • Cancelled indicator • Current supplier registration date • Mpan and designation • Relationship status indicator • Energisation status • GSP group • Trading status • Distributor	We will include this as a risk in the Final Change Report. The Code Manager is closely monitoring the progress of R0022 Amendment the REC Data Access Matrix to ensure action can quickly be taken to ensure any risk is mitigated. This action may include delaying the implementation date of this change.

QUESTION 3	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
		We understand that this has been identified as a dependency but also feel it should be identified as a risk.	

QUESTION 4	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
Do you agree with the proposed implementation date and approach? If no, please provide rationale.	Northern Powergrid (DNO)	Yes	Noted
	Utilita Energy Limited (Supplier)	Yes	
	Western Power Distribution (DNO)	Yes we agree with the proposed implementation date, however, we do note the risk that the implementation date sits within the appeals window. The mitigation is an assumption that as this is a simple change, there would not be any appeal made against the change, however, the mitigation should detail what actions will be taken should an appeal be raised.	The Code Manager will put additional detail as to what actions will be taken should an appeal be raised against this change.

QUESTION 5	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
Do you agree with the Code Managers assessment of there being no REC Party Impacts? If no, could you please describe these impacts.	Northern Powergrid (DNO)	Yes	Noted
	Western Power Distribution (DNO)	Yes we agree	
	Utilita Energy Limited (Supplier)	Yes	

QUESTION 6	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the REC Change Panel?	Northern Powergrid (DNO)	Yes	Noted
	Western Power Distribution (DNO)	Yes we agree	
	Utilita Energy Limited (Supplier)	Yes	

QUESTION 7	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
Do you agree with the Code Manager's assessment of the case for change and the minded-to position that this Change Proposal should be approved for implementation on 04 November 2022? If not, please explain why?	Northern Powergrid (DNO)	Yes	Noted
	Western Power Distribution (DNO)	Yes we agree, however please see response in question 3.	
	Utilita Energy Limited (Supplier)	Yes	

QUESTION 8	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
Do you have any other comments relating to this Change Proposal?	Northern Powergrid (DNO)	No	Noted
	Western Power Distribution (DNO)		
	Utilita Energy Limited (Supplier)	No further comments.	