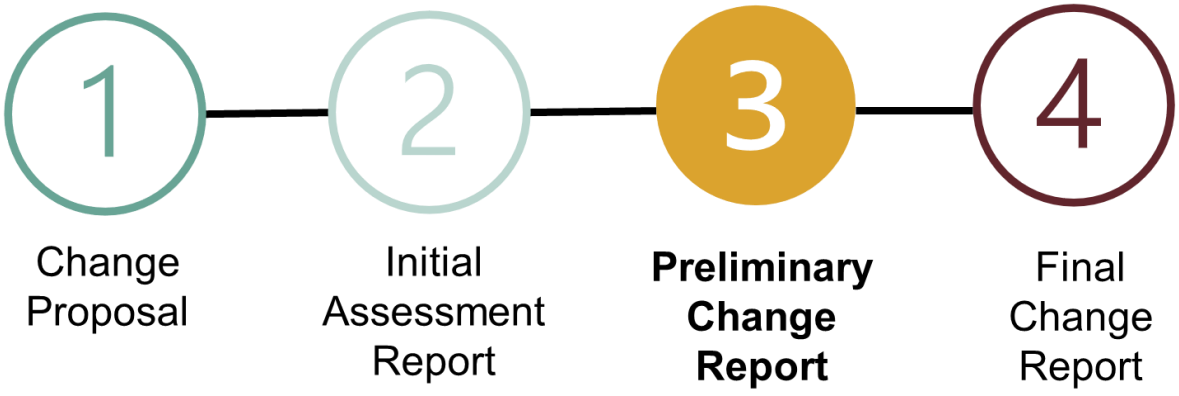
RETAIL ENERGY CODE

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Information is for public, unrestricted dissemination and publication.

PRELIMINARY CHANGE REPORT



PURPOSE:	The Preliminary Change Report is drafted by the Code Manager when a Change Proposal has a fully formed solution that has been sufficiently assessed to allow a decision to be made on whether this should be approved for implementation. The report includes a summary of the Change Proposal, details of the proposed solution and the Code Manager's view on the case for change and recommendation.
NOTES:	The report sets out the minded-to position, prior to formal consultation, and may be changed when publishing the Final Change Report.
NEXT STEPS:	The Preliminary Change Report will be issued for consultation. Following this, the Code Manager will produce a Final Change Report and the Responsible Committee will make a decision on whether to approve the Change Proposal.

RETAIL ENERGY CODE

01	Initial Assessment Report
02	Preliminary Change Report
03	Final Change Report

PRELIMINARY CHANGE REPORT

R0054 – EES ACCESS FOR VIRTUAL LEAD PARTIES

DOCUMENT VERSION	1.0
DATE ISSUED	02/09/2022
DOCUMENT APPROVAL STATUS	PUBLISHED FOR CONSULTATION

RESPONSIBLE COMMITTEE	TECHNICAL EXPERT PANEL

LEAD ANALYST	George Barnes	EMAIL
TECHNICAL LEAD	Ryan Dale	EMAIL
ASSURANCE LEAD	Cristina Bermudez Alvarev	EMAIL

CHANGE OVERVIEW

This Change Proposal seeks to allow Virtual Lead Parties (VLP) access to the Electricity Enquiry Service (EES), to allow them to efficiently register their customers for balancing services under the Balancing and Settlement Code (BSC).

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0054 is **APPROVED** for implementation on 04 November 2022.

	High Impact: N/A
	Medium Impact: N/A
	Low Impact: Electricity Enquiry Service (EES) Provider, Virtual Lead Parties (VLPs)

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BACKGROUND

1 SUMMARY

Virtual Lead Parties (VLPs) are a Market Participant defined under the Balancing and Settlement Code (BSC). VLPs independently aggregate Supplier Volume Allocation (SVA) registered units to be entered into the balancing mechanism. VLPs are required by the BSC to provide their customer's MPAN as part of their application to provide balancing services.

As an independent aggregator with no link to an Energy Supplier, a VLP does not fit into any of the Market Roles currently defined as users of the Electricity Enquiry Service (EES) within the electricity Data Access Matrix (DAM).

This Change Proposal seeks to update the DAM to include VLPs as a new EES User Category, which will allow them access to the Data Items required to fulfil their Market Role. The change will also require the EES to be updated to reflect the new access for VLPs. There are currently only a small number of VLPs, however, this change will provide the mechanism for all VLPs to request access without the need for further change proposals to be raised.

2 PROBLEM STATEMENT

VLPs are required to provide their customer's MPAN as part of the registration process, as per the Balancing and Settlement Code (BSC). VLPs do not currently have access to the EES to enable an MPAN search and they have no reliable means to acquire the MPAN, other than asking their customer to provide it. This could potentially lead to delays in the registration process and may result in an increased risk of inaccurate data, detrimentally impacting the service VLPs are able to provide to their customers.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As an Energy Consumer, I want my VLP to have access to the data needed to correctly register me in a timely manner, so there aren't delays in the delivery of my service.
MARKET PARTICIPANT USER STORIES	
M1	As a VLP, I want to have access to all the data I need to register my customers so I can deliver the service they have requested, without delay.
M2	As a VLP, I want to be able to use the EES to find the MPAN of a customer using their address information, to enable me to reliably gather this data to without delay or further engagement with my customer.

4 PROPOSALSUMMARY OF IMPACT ASSESSMENT ACTIVITY

4.1 SERVICE PROVIDER IMPACT ASSESSMENTS

An Impact Assessment was issued to the EES Provider, to assess the cost and impact of change to EES systems.

EES Provider	• Two solutions were assessed. Whilst these were fundamentally the same, one considered implementation prior to R0022, and the other considered implementation after R0022.
	  ○ The costs for implementation of this change prior to the implementation of R0022 is laid out in section 12.1 of this document.
	  ○ The EES Provider have confirmed there will be no cost should the Change Proposal be implemented alongside or after R0022.
	  ○ If this change was implemented prior to R0022, the EES Provider would not be able to restrict the data items in EES to the level we have requested. This would mean that VLPs would also have access to the following additional data items;
	  ▪ Cancelledindicator
	  ▪ Currentsupplierregistrationdate
	  ▪ Mpandesignation
	  ▪ Relationshipstatusindicator
	  ▪ Energisation status
	  ▪ GSP group
	  ▪ Trading status
	  ▪ Distributor
	  ○ The access to these additional data items would be removed when R0022 is implemented.
	• Implementation timelines were provided (Circa 7.75 FTE Days).
	• The EES Provider considered the assumptions provided by the Code Manager and validated the assumption on VLP EES access methods (A1). The EES Provider also provided their own assumptions for consideration by the Code Manager.

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5 DELIVERY AGAINST CHANGE PROPOSAL PLAN

	PLANNED	COMPLETED
SERVICE PROVIDER IMPACT ASSESSMENT ISSUED	22/07/2022	22/07/2022
DEADLINE FOR ALTERNATIVE CHANGE PROPOSAL SUBMISSION	02/09/2022	02/09/2022
PRELIMINARY CHANGE REPORT ISSUED	02/09/2022	02/09/2022

To date, the activity for this Change Proposal has been completed in line with the Change Proposal Plan.

6 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

6.1 RISKS AND ISSUES

No.	RISK	NOTES	MITIGATION
R1	Implementation During Appeals Window	The implementation date we are proposing (04 November 2022) for this change sits within the appeals window which will end 10 November 2022.	Due the simplicity of this change we do not anticipate any appeals being made against this change proposal.

6.2 ASSUMPTIONS AND DEPENDENCIES

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A1	The method of access to EES Data (GIU, API, Reports etc) is not determined by the Data Access Matrix (DAM)	Method of retrieval should not impact the available data.	Confirmed through the EES Provider Impact Assessment

No.	DEPENDENCY	NOTES	STATUS
D1	Change Proposal R0022 is seeking to make fundamental changes to the EES.	The R0022 solution seeks to make changes to the way new user categories are added to the EES system by the EES Provider. This will remove any cost associated with implementing this change from the EES Provider. Due to this, this change should be implemented at the same time or after R0022. Despite of this we have included a contingency solution which will be implemented should R0022 be rejected.	Open – can be closed when R0022 is confirmed on 04 October 2022

7 PROPOSED SOLUTION

The Code Manager considers this solution to be simple, to add a new party category into the EES system to allow VLPs to access the EES data they require to fulfil their Market Role.

This solution will then require the EES Provider to make the necessary amendments to their systems to accommodate the new Market Role, with access to the correct data items.

The solution will make amendments to the DAM, this will specify EES data items they are permitted to access. Change Proposal R0022 will introduce a new version of the DAM, this Change Proposal will make amendments to this updated version.

The below table shows what the DAM, post R0022 implementation, will look like with the VLP access added.

Data Access Matrix Electricity	Virtual Lead Party (VLP)
Data Items	Community
Address Line 1	Yes
Address Line 2	Yes
Address Line 3	Yes
Address Line 4	Yes
Address Line 5	Yes
Address Line 6	Yes
Address Line 7	Yes
Address Line 8	Yes
Address Line 9	Yes
MPAN Core	Yes
Postcode	Yes

This solution fully resolves the issue presented within the problem statement. Currently VLPs are unable to apply for access to EES through the standard process available to industry

parties. This Change Proposal, if implemented, will enable VLPs to use that same standard process, whilst ensuring they have access to the correct data.

This solution is not subject to costs as listed in section 12.1.

7.1 R0022 CONTINGANCY

Due to the dependency of R0022, the Code Manager believes it is appropriate to include a version of the solution to be implemented should R0022 not be implemented as currently planned.

The legal text will remain the same, however the DAM implemented will differ as it will be created as per the current format of this table. This version of the DAM can be found here within the as-is tab.

Please note, this change will be subject to the costs outlind in section 12.1 of this document, as well as giving access to additional data items, as set out in section 4.1, due to limitations with the EES system.

8 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0054 can be found here.

9 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	04 November 2022

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

The proposed implementation date and approach for this change aligns with R0022, due to the changes this is making to the DAM it is most appropriate for these changes to be implemented concurrently.

10 CHANGE PATH

CHANGE PATH	SELF-GOVERNANCE

11 RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	TECHNICAL EXPERT PANEL

12 BUSINESS CASE ASSESSMENT

12.1 COSTS

The below costs are only relevant should this Change Proposal be implemented independently of R0022. This will only happen should R0022 not be implemented, or the solution for that change is altered.

	DESIGN/ DEVELOPMENT COSTS	IMPLEMENTATION COSTS	ONGOING OPERATIONAL COSTS
EES Provider[1]	£2,857	£4,919	N/A

12.2 BENEFITS

No tangible benefits have been identified for this Change Proposal. This Change Proposal is being progressed to allow a Market Participant the access they require to EES to fulfil their Market Role effectively.

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
VLP Registration	VLPs are a recognised Market Role, and under the BSC they are required to provide the MPAN as part of their registration. This Change Proposal enables them to carry out their Market Role more efficiently.
VLPs	Vitrual Lead Parties are a recognised industry party who operate under the BSC. Because of this, it is appropriate for them to have access to EES.

13 CASE FOR CHANGE

The Code Manager considers that there is a case for change to implement this Change Proposal, on the basis that;

- the proposed solution is fully formed, and appropriately resolves the problem statement
- the proposed solution will provide an already recognised Market Role, VLPs, the appropriate access to carry out their function.
- the proposed solution offers positive outcomes for consumers who contract with a VLP through an improved registration journey, made possible by the improved efficiency it will offer.
- If this change is not implemented there is no other practical way for VLPs to access the MPAN data item.

[1] EES Provider costs are exclusive of, and subject to VAT.

14 CODE MANAGER'S RECOMMENDATION

Based on the evidence in sections 12 and 13 of this report, the Code Manager considers a positive business case can be made for implementing this solution and recommends that the REC Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 04 November 2022.
-

15 CONSULTATION PLAN AND NEXT STEPS

The consultation on this Preliminary Change Report will be published on the REC Portal on **02 September 2022** and will close on **16 September 2022.**

Following consultation, the Code Manager will produce an updated version of this Preliminary Change Report (referred to as the Final Change Report). This will include the outcome of the consultation, setting out a summary of the consultation submissions and the Code Manager's response.

The Final Change Report will be issued to the Technical Expert Panel to make its determination.

16 APPENDIX

CHANGE PROPOSAL	Change Proposal Page
LEGAL DRAFTING	Link to EMAR
RELATED CHANGE(S)	R0022
ANY OTHER DOCUMENTS / LINKS	Draft Changes to the Data Access Matrix Draft Legal Text