RETAIL ENERGY CODE

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

CHANGE REPORT

R0090 – ALIGNMENT OF DATA SPECIFICATION WITH PRE-REC RULES AND CONSEQUENTIAL IMPACTS ON R0011 LEGAL TEXT

CHANGE REPORT	PRELIMINARY
DOCUMENT VERSION	1.0
ISSUED DATE	24/03/2023
DOCUMENT APPROVAL STATUS	ISSUED FOR CONSULTATION

RESPONSIBLE COMMITTEE	TECHNICAL EXPERT PANEL	CHANGE PATH	SELF GOVERNANCE
PRIORITY STATUS	LOW	URGENCY	STANDARD

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	27/03/2023

LEAD CHANGE ANALYST



Gemma Dixon

Click to send an email

0203890 9062

TECHNICAL LEAD

Rosalind Timperley

Click to send an email

CHANGE OVERVIEW

This Change Proposal seeks to address inconsistencies in the REC Data Specification, to reflect pre-REC Data Transfer Catalogue (DTC) standards and apply consequential updates to the R0011 legal text.

	High Impact: N/A
	Medium Impact: Energy Suppliers, Generators and Capacity Providers
	Low Impact: N/A

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0090 is **APPROVED** for implementation on 30 June 2023.

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BACKGROUND

1 BACKGROUND

When the legal text for REC R0011 "Reporting of Additional EMR Backing Data to Suppliers" was prepared, it was drafted using the REC Data Specification rules. Following approval of R0011, two organisations raised concerns that the R0011 legal drafting was inconsistent with historic (i.e., pre-REC) formatting rules and that this could cause confusion in how to implement the R0011 Data Specification changes.

This Change Proposal has been raised to address concerns with the R0011 legal text by:

- Adding a monetary Datatype Format Rule to the Standards Definition Document.
- Amending the Data Item Length definitions in the Standards Definition Document;
- Amending the R0011 Legal Text; and
- Amending non-R0011 Monetary Data Items.

The proposed changes to the R0011 legal text have been summarised here.

R0011 is due to be implemented in June 2023. This Change Proposal will require approval before this date so that Parties have clarity on what data specification changes, they need to apply.

2 PROBLEM STATEMENT

The approved R0011 legal text contains inconsistencies with other Data Items that were last amended before the REC Data Specification came into effect. Such inconsistencies have potential to cause confusion to Parties implementing the R0011 legal text.

3 USER STORIES

REF.	USER STORIES
MARKET PARTICIPANT USER STORIES	
M1	As a Market Participant I want to have clarity on the format of Data Items within the Data Specification, so that my internal systems can be correctly configured to send and receive Data Items within Market Messages.

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PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

Following two organisations raising concerns regarding the R0011 legal drafting being inconsistent with historic (i.e., pre-REC) formatting rules, a full review of the R0011 legal text and REC Data Specifications Standards Definition document was undertaken. This review identified a number of issues impacting the R0011 legal text. R0090 has been raised to address these issues, so that Parties have clarity on how to implement R0011.

The REC Code Manager will be raising a further REC Data Specification Change Proposal to address other areas of the REC Data Specification that would benefit from additional clarity, in areas that do not impact on the implementation of R0011.

5 PROPOSED SOLUTION

The proposed solution updates the REC Data Specification Standards Definition Document to reflect pre-REC Data Transfer Network (DTN) standards, applies consequential updates and corrections to the R0011 legal text. The proposed solution will:

- **Add a monetary Datatype Format Rule to the Standards Definition Document:** under the current REC Data Specification rules, there is no way to indicate that a Data Item should be monetary. By re-introducing the monetary Datatype Format Rule, that existed prior to REC, we can provide clarity on the units of measurement.
- **Amend the Data Item Length definitions in the Standards Definition Document:** the current definitions in the REC could be open to interpretation, so this change seeks to add clarity to the definitions of the fields ‘data item physical length’ and ‘data item decimal length’. It also adds a definition for ‘data item logical length’.
- **Amend the R0011 Legal Text:** this change seeks to update the R0011 legal text to reflect the addition of the monetary Datatype Format Rule and to mirror the pre-REC logical, physical and decimal lengths. Corrections have also been applied within the legal text, e.g., amending all instances of Data Type Format “EffectiveDate” to “Calendar Date”, as “EffectiveDate” is not in the Standards Definition document.
- **Amend non-R0011 Monetary Data Items:** this change seeks to apply the monetary Datatype Format Rule to all non-R0011 Data Items within the REC Data Specification that were Data Item monetary datatype prior to the creation of the REC. This will ensure that there is consistency across all Data Items of this type in the REC Data Specification.

6 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0090 can be found here.

7 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

7.1 REC PARTY IMPACT ASSESSMENTS

A Party Impact Assessment was issued on the 24 February 2023 and closed on the 17 March 2023; no responses were received.

8 DELIVERY AGAINST CHANGE PROPOSAL PLAN

To date all activity has been completed within the planned timescales.

The Change Proposal Plan can be found here.

9 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

9.1 RISKS AND ISSUES

No.	RISK	NOTES	MITIGATION
R0090.CPP.R001	Parties may have started development for R0011 ahead of this Change Proposal being raised.		Parties have been notified through the REC Communications, the Change Weekly Bulletin and through the REC Release Page of the REC Change Portal.
R0090.CPP.R002	Parties may not have started development for R0011 and may need to delay development or proceed at risk until the Data Specification is confirmed as part of this Change Proposal.		The Code Manager has confirmed the elements of the R0011 solution that are not impacted by this Change Proposal, to allow impacted Parties to begin/continue development on the stable elements of the R0011 solution. This will be communicated through a range of communication channels.

9.2 ASSUMPTIONS AND DEPENDENCIES

No.	ASSUMPTION	NOTES	STATUS
R0090.PCR.A001	The implementation date of R0011 will not need to change as a result of this Change Proposal.	This will be validated through consultation	Open

No.	DEPENDENCY	NOTES	STATUS
R0090.CPP.D001	The Change Panel will need to be confident with the timetable for progression in order for a decision to be reached on whether to approve this Change Proposal.		Closed – Change Proposal Plan approved.

10 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	30/06/2023

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

As Change Proposal R0011 is due to be implemented in June 2023, this Change Proposal will require approval before this date so that Parties can have clarity on what data specification changes, they need to apply. The Code Manager does not expect this change to have any impacts on the implementation date of R0011 however this will be validated through the consultation.

11 CASE FOR CHANGE

The Code Manager considers that there is a case for change on the basis that by not approving this Change Proposal, Market Participants affected would not realise the benefits of R0011 due to inconsistencies in the Data Specification. Market Message failures would cause issues with the reconciliation of invoices issued by EMRS to Suppliers and Generators.

12 CODE MANAGER'S RECOMMENDATION

Based on the evidence in section 11 of this report, the Code Manager considers a positive business case can be made for implementing this solution and recommends that the Technical Expert Panel (TEP):

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 30 June 2023

13 CONSULTATION PLAN AND NEXT STEPS

The consultation on this Preliminary Change Report for R0090 will be published on the REC Portal on **27 March 2023** and closes on **11 April 2023**.

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.

14 APPENDIX

CHANGE PROPOSAL	R0090 - Change Proposal Page
LEGAL DRAFTING	Draft Legal Text
RELATED CHANGE(S)	R0011 - Reporting of Additional EMR Backing Data to Suppliers

15 GLOSSARY

TERM	DEFINITION
Data Item	means the most granular level of data defining a specific attribute in respect of a Data Type, the permissible values for which are defined and controlled in the Data Item Catalogue
Datatype Format Rule	A Datatype Format Rule supports a specific datatype validation requirement for one or more Physical Messaging Standards, as set out in the Energy Market Data Specification Standards Definition Document
Market Message	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
Data Specification	means the document of that name forming part of the Technical Specification.
Market Participant	means a participant in either or both of the gas and electricity markets of Great Britain, each of which is identified by a Market Participant Role