RETAIL ENERGY CODE

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

FINAL CHANGE REPORT

R0002 – REVIEW OF DATA SPECIFICATION CATEGORY IN REC BASELINE STATEMENT

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RESPONSIBLE COMMITTEE	CHANGE PANEL

LEAD ANALYST	Jon Hawkins	jon.hawkins@recmanager.co.uk

CHANGE OVERVIEW

	High Impact: None
	Medium Impact: None
	Low Impact: All REC Parties and Market Participants listed as a Market Data Service in the Data Specification

This proposal seeks to formally designate parts of the Data Specification as Category 2 documents in the REC Baseline Statement, so these are subject to formal change control set out in the REC Change Management Schedule.

RESPONSIBLE COMMITTEE DECISION

On 5th October 2021, the Change Panel voted unanimously for Change Proposal R0002 to be **APPROVED** for implementation on 4th November 2021.

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BACKGROUND

1 SUMMARY

The introduction of the Data Specification as part of REC V2.0 was consulted on by Ofgem in their consultation on REC V2.0 and Retail Code Consolidation and confirmed in their decision published on 30th April 2021. The intention was for this to be included in the Switching Programme Change Request to make the required changes to the REC for Retail Code Consolidation.

Unfortunately, the Data Specification was not included in CR-D092 or CR-D099, which were the Switching Programme CR's that gave effect to REC V2.0. Therefore, the Data Specification was not formally designated as part of REC V2.0 and has temporarily been added to the REC Baseline Statement as a Category 3 product.

This means that changes to the Data Specification, including changes to Market Messages and Data Items used by Market Participants to interface with other businesses and Service Providers, are not subject to the process set out in the REC Change Management Schedule.

Changes to these artefacts can have significant impacts to the systems and processes of Market Participants and Service Providers. These changes should follow a robust and thorough assessment to ensure these impacts are identified and considered, and the most appropriate solution is considered. The Category 3 change process is not appropriate for this, as changes to Category 3 products as a rule should not cause a material impact to parties and stakeholders.

The formal REC change process will provide the formal engagement mechanisms for industry stakeholders and required controls for changes to the Data Specification, as originally intended by the Switching Programme.

2 PROBLEM STATEMENT

The Data Specification was not included in the Switching Programme Change Requests that gave effect to REC V2.0. Therefore, the Data Specification was not formally designated as part of REC V2.0 and has temporarily been added to the REC Baseline Statement as a Category 3 product.

This means that changes to the Data Specification, including changes to Market Messages and Data Items used by Market Participants to interface with other businesses and Service Providers, are not subject to the process set out in the REC Change Management Schedule.

Changes to these artefacts can have significant impacts to the systems and processes of Market Participants and Service Providers. These changes should follow a robust and thorough assessment to ensure these impacts are identified and considered, and the most appropriate solution is considered. The Category 3 change process is not appropriate for this, as changes to Category 3 products should not cause a material impact to REC Parties and stakeholders.

3 USER STORIES

REF.	USER STORIES
MARKET PARTICIPANT USER STORIES	
M1	As a Market Participant, I need to understand any changes to Market Messages I send and receive that may impact my business, so I can engage in the change process and plan any required changes to my systems and processes.
M2	As the REC Code Manager, I need to ensure that proposals to amend the Data Specification are subject to appropriate scrutiny and impact assessment, so that impacted stakeholders can appropriately engage with the proposal and understand the impacts to their business.

PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

There are currently nine products listed in the REC Baseline Statement that are related to the Data Specification. Four of which (the Standards Definition, Market Message Catalogue, Data Item Catalogue and Data Access Matrix) are the core components of the Data Specification that were included in Ofgem's consultation on REC v2.0 and Retail Code Consolidation . The other five products relate to the gas Market Domain Data tables previously governed under the Supply Point Administration Agreement (SPAA).

The Code Manager has assessed each of these products, and determined that only the Standards Definition, Market Message Catalogue, Data Item Catalogue and Data Access Matrix should be designated as part of the REC itself, as Category 2 products. The intention of this Change Proposal is to reflect the original intention of the Switching Programme, and not to expand the scope at this stage.

Changes to Market Domain Data tables are often required at short notice, and don't require the same level of assessment and scrutiny as changes to the REC itself. These changes will need to follow an expedited process, whilst still being subject to appropriate scrutiny. These are currently designated as Category 3 products under the maintenance of the Technical Expert Panel, which ensures that they are subject to formal change control but follow an expedited change process to allow changes to be made to these products as needed. The Code Manager will work with the Technical Expert Panel to agree what the appropriate change control process for these products should be under the Category 3 change process, separately to this Change Proposal.

5 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

5.1 RISKS AND ISSUES

There are no live risks or issues identified with this Change Proposal. There was a previous risk identified relating to the ability to meet the required timescales for progressing this Change Proposal, which is no longer relevant as these have now been met.

5.2 ASSUMPTIONS AND DEPENDENCIES

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A1	The intention of the Switching Programme was to designate the Data Specification as part of the REC, but this was missed from the formal Change Requests.	It was always the intention of the Switching Programme that the Data Specification would form part of the REC. The absence of this from the formal Change Request was an oversight rather than a deliberate intention or change of policy.	There were no concerns raised in the consultation to challenge this assumption and all respondents agreed with the proposed solution.

6 PROPOSED SOLUTION

This proposed solution is to formerly designate the following documents as part of the REC by amendment their Category in the REC Baseline Statement to Category 2:

- Data Item Catalogue
- Market Message Catalogue
- Data Access Matrix
- Standards Definition

7 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0002 can be found on the Change Proposal Page in the REC Portal.

8 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	04/11/2021

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

We propose this change is implemented in the next available standard REC release on 4th November 2021. This will align with the proposed implementation date for R0001 (Amendment to DCC Service Flag (DI51130) Data Item), which proposes to amend the Data Item Catalogue as part of the formal REC change process.

It will also ensure that any further Change Proposals raised to amend the Data Specification will follow the formal change process going forwards.

9 CHANGE PATH

CHANGE PATH	SELF-GOVERNANCE

10 RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	CHANGE PANEL

11 SUMMARY OF CONSULTATION RESPONSES

A consultation was issued on 14th September 2021 to obtain views on the Preliminary Change Report. In total six responses were received from three Distribution Network Operators, two Energy Suppliers and from Xoserve. The full set of non-confidential responses can be found in Appendix 2. The key themes from these responses have been summarised and set out below.

11.1 SUMMARY OF RESPONSES

11.1.1 COMMENTS ON THE SOLUTION

All respondents agreed with the proposed solution and did not have any comments in relation to this.

11.1.2 IMPLEMENTATION DATE AND TECHNIQUE

All respondents agreed with the proposed implementation date and technique.

11.1.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

All respondents agreed with the Code Manager's recommendation that this change should be approved for implementation on 4th November 2021.

11.1.4 OTHER COMMENTS

One respondent highlighted that they are not clear how the updated version of the Data Specification will be made available to them to update their data flow management software, as they previously relied on the access database provided by MRASCo for equivalent updates to the Data Transfer Catalogue.

The Code Manager recognises that this will be the first industry release where information will be made available in the EMAR, and there are short lead times between a decision being made on whether to approve this Change Proposal and the proposed implementation date. The Code Manager has arranged for a November 2021 release drop in session to be held on 11th October 2021, to provide guidance to stakeholders on how to access this information. Anyone who hasn't received the invitation for this can sign up to the event using this link.

12 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

DOCUMENT	SECTION	AMENDMENT	REASON
Final Change Report	5.1 (Risks and Issues)	A former risk (R1) that related to the ability to meet the required timescales for progressing this Change Proposal has been removed.	This risk is no longer relevant, as the timescales required to progress this Change Proposal has now been met.
Final Change Report	5.2 (Assumptions and Dependencies)	Assumption A1 has been updated to reflect that this has been validated during the consultation period.	All respondents agreed with the proposed solution and did not challenge this assumption.
Final Change Report	5.2 (Assumptions and Dependencies)	A former dependency (D1) relating to the dependency on the Change Panel to approve the Change Proposal Plan has been removed.	This dependency was closed in the Preliminary Change Report and is no longer relevant as the timescales required to progress this Change Proposal have now been met.

13 BUSINESS CASE ASSESSMENT

There is no additional cost or impact identified from this change, and this reflects the original policy intention of the Switching Programme in designating REC v2.0. The REC Code Manager mobilised under the assumption that these products will be Category 2 products so there are no additional costs to the Code Manager in the operation of the change process.

Market Participants and Service Providers rely on the Data Specification to develop their systems and process to interface with industry systems and other Market Participants. Changes to these products can have significant impacts to these stakeholders and to consumers, as these underpin the processes for switching, billing, settlement, metering and other core industry processes. These products existing outside of the formal REC change process presents significant risk to the ability of REC Parties and Service Providers to comply with their obligations, and to interoperability in the market as a whole.

We are therefore satisfied that a positive business case exists for correcting this and implementing this Change Proposal.

14 CASE FOR CHANGE

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

- The proposed solution is fully formed and appropriately resolves the problem statement.
- There are no identified additional costs to the market in implementing the proposed solution.
- The impact of not implementing this solution would cause detriment to Market Participants, as it would be possible for changes to be made to the Data Specification without being subject to the full assessment and scrutiny of the REC change process.
- A positive business case can be made, as detailed in section 13 of this report.

15 CODE MANAGER'S RECOMMENDATION

Based on the evidence in sections 13 and 14 of this report, the Code Manager considers a positive business case can be made for implementing this solution and recommends that the Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 04 November 2021.

16 RESPONSIBLE COMMITTEE DECISION

On 5th October 2021, the Change Panel voted unanimously to:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 4th November 2021.

Subject to no appeal being raised before the closure of the appeals window on 20th October 2021, this Change Proposal shall be implemented on 4th November 2021.

17 APPENDIX 1 – LINKS

CHANGE PROPOSAL	Change Proposal Page
LEGAL DRAFTING	Change Proposal Page

18 APPENDIX 2 – CONSOLIDATED CONSULTATION RESPONSES

QUESTION	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
Do you agree with the proposed solution? If not, please explain why?	**Scottish & Southern Electricity Networks (SSEN)** Distribution Network Operator	SSEN agrees that this change is required to ensure any changes to data specification should be thoroughly assessed for any impacts to market participants systems and processes and therefore should be category 2 products.	
	Scottish Power Energy Networks Distribution Network Operator	Yes	
	Western Power Distribution Distribution Network Operator	We agree with the proposed solution.	
	Xoserve REC/UNC Service Provider	Yes, we agree with the proposal of amending the categories of change under the	

		Change Management Schedule. We expect that this proposal will have limited impacts to the CDSP as the majority of interfaces that the CDSP contribute towards the EMAR are controlled under the existing DSC and UNC.	
	Utilita Energy Supplier	Yes, we agree	
	EDF Energy Supplier	Yes, we agree with the proposed solution. Given the impact that changes to them will have, the products that comprise the Data Specification should be designated as part of the REC itself, as Category 2 products, and subject to the appropriate change control processes.	
Do you agree with the proposed implementation date and implementation technique? If not, please explain why?	**Scottish & Southern Electricity Networks (SSEN)** Distribution Network Operator	Agreed	
	Scottish Power Energy Networks Distribution Network Operator	Yes	
	Western Power Distribution Distribution Network Operator	We agree with the proposed implementation date and technique.	

	Xoserve REC/UNC Service Provider	Yes, 4th November is acceptable to align with REC Major Release cycle.	
	Utilita Energy Supplier	Yes, we agree	
	EDF Energy Supplier	Yes, we agree with the proposed implementation date and implementation technique.	
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 Change Panel?	**Scottish & Southern Electricity Networks (SSEN)** Distribution Network Operator	Agreed	
	Scottish Power Energy Networks Distribution Network Operator	Yes	
	Western Power Distribution Distribution Network Operator	We agree with the assessment of the Change Path and that this change should be subject to Self-Governance approval.	
	Xoserve REC/UNC Service Provider	Yes, no concerns have been noted at this stage.	
	Utilita Energy Supplier	Yes, we agree	
	EDF Energy Supplier	Yes, we agree that this Change Proposal should be subject to Self-Governance approval by the Change Panel.	
Do you agree with the Code Manager's	**Scottish & Southern Electricity Networks (SSEN)**	As this change has low impact the implementation date is acceptable.	

recommendation that this Change Proposal should be approved for implementation on 4th November 2021? If not, please explain why?	Distribution Network Operator		
	Scottish Power Energy Networks Distribution Network Operator	Yes	
	Western Power Distribution Distribution Network Operator	We agree that this change should be implemented on the 4th November 2021.	
	Xoserve REC/UNC Service Provider	Yes, 4th November is acceptable to align with REC Major Release cycle.	
	Utilita Energy Supplier	Yes, we agree	
	EDF Energy Supplier	Yes, we agree that this Change Proposal should be approved for implementation on 4th November 2021.	
Do you have any other comments relating to this Change Proposal?	**Scottish & Southern Electricity Networks (SSEN)** Distribution Network Operator	None at this time	
	Scottish Power Energy Networks Distribution Network Operator	No	
	Western Power Distribution Distribution Network Operator	**No response**	
	Xoserve REC/UNC Service Provider	This change is not deemed to have a material impact to the CDSP or it's customers as this is a governance amendment	

		for the categorisation of different change types and where they lie within the Change Management Schedule.	
	Utilita Energy Supplier	No	
	EDF Energy Supplier	The REC Data Specification itself is still new to parties and further communication and training is required to enable parties to fully understand how it works. We are still not clear how exactly the information regarding the updates being made to the Data Specification will be communicated to parties in the absence of the Access database that was used for DTC updates under MRA governance, and how we will be able to use this information to update our dataflow management software.	The Code Manager recognises that this is the first release where REC stakeholders will be required to access pre-release information from the EMAR and will not be familiar with the new arrangements. We have arranged for a drop in session to provide guidance on how to access this information on 11th October 2021 and address any other questions about the November 2021 release.