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CHANGE PROPOSAL PLAN

R0022 – AMENDMENT TO REC DATA ACCESS MATRIX

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RESPONSIBLE COMMITTEE	REC CHANGE PANEL

LEAD ANALYST
Harriet Truss
EMAIL

TECHNICAL LEAD
Michael Taylor
EMAIL

ASSURANCE LEAD
Cristina Bermudez Alvarez
EMAIL

CHANGE OVERVIEW

This change seeks to standardise Electricity Enquiry Service (EES) data access permissions across EES User Categories via a review and update to the Data Access Matrix (DAM).

KEY MILESTONES	FROM	TO
ANALYSIS & SOLUTION DEVELOPMENT (COMPLETE)	16/02/2022	28/03/2022
PARTY IMPACT ASSESSMENT PERIOD (COMPLETE)	01/04/2022	26/04/2022
SERVICE PROVIDER IMPACT ASSESSMENT PERIOD	12/05/2022	18/07/2022
TECHNICAL EXPERT PANEL SOLUTION REVIEW (COMPLETE)	29/06/2022	29/06/2022
PRELIMINARY CHANGE REPORT PUBLISHED (COMPLETE)	08/07/2022	08/07/2022
REC CHANGE PANEL REVIEW	19/07/2022	19/07/2022
CONSULTATION PERIOD – PART 1	22/07/2022	12/08/2022
TECHNICAL EXPERT PANEL RECOMMENDATION	02/08/2022	05/08/2022
REC CHANGE PANEL REVIEW OF UPDATED PRELIMINARY CHANGE REPORT	16/08/2022	16/08/2022
CONSULTATION PERIOD – PART 2	18/08/2022	02/09/2022
FINAL CHANGE REPORT PUBLISHED	23/09/2022	23/09/2022
REC CHANGE PANEL DECISION	04/10/2020	04/10/2020
APPEAL WINDOW	04/10/2020	18/10/2020

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1 RE-BASELINE ACTIVITY

This Change Proposal Plan has been re-baselined following a delay to the Detailed Impact Assessment (DIA) being issued to the EES Provider. Detail and clarifications were required following a review of the proposed solution and requirements that could not be completed in the time running up to the planned date. The EES Provider was kept informed during the delay and the subsequent replan was agreed together. The DIA was issued on 01 July 2022.

This Change Proposal Plan has been updated to accommodate the revision to the Service Provider Impact Assessment timelines. The milestones for completion and then consideration of the DIA response by the REC Technical Expert Panel have been updated. The updated Preliminary Change Report will be published in advance of the REC Change Panel on 16 August 2022. All subsequent dates have been maintained so that 04 November 2022 can still be targeted for implementation.

The new plan dates are provided in the following table:

	APPROVED DATES		PROPOSED DATES	
	FROM	TO	FROM	TO
ANALYSIS & SOLUTION DEVELOPMENT (COMPLETE)	16/02/2022	28/03/2022	N/A	N/A
PARTY IMPACT ASSESSMENT PERIOD (COMPLETE)	01/04/2022	26/04/2022	N/A	N/A
SERVICE PROVIDER IMPACT ASSESSMENT PERIOD	12/05/2022	11/07/2022	12/05/2022	**18/07/2022**
TECHNICAL EXPERT PANEL SOLUTION REVIEW (COMPLETE)	29/06/2022	29/06/2022	29/06/2022	29/06/2022
PRELIMINARY CHANGE REPORT PUBLISHED (COMPLETE)	08/07/2022	08/07/2022	08/07/2022	08/07/2022
REC CHANGE PANEL REVIEW	19/07/2022	19/07/2022	19/07/2022	19/07/2022
CONSULTATION PERIOD – PART 1	22/07/2022	12/08/2022	22/07/2022	12/08/2022
TECHNICAL EXPERT PANEL RECOMMENDATION	27/07/2022	27/07/2022	**02/08/2022**	**05/08/2022**
REC CHANGE PANEL REVIEW OF UPDATED PRELIMINARY CHANGE REPORT	16/08/2022	16/08/2022	**16/08/2022**	**16/08/2022**
CONSULTATION PERIOD – PART 2	18/08/2022	02/09/2022	**18/08/2022**	**02/09/2022**
FINAL CHANGE REPORT PUBLISHED	23/09/2022	23/09/2022	**23/09/2022**	**23/09/2022**
REC CHANGE PANEL DECISION	04/10/2020	04/10/2020	**04/10/2020**	**04/10/2020**
APPEAL WINDOW	04/10/2020	18/10/2020	**04/10/2020**	**18/10/2020**

The following sections of this document have been updated:

- 3.3.1 Impact Assessment Plan
- 3.3.3 Engagement with REC Committees / Sub-Committees (New section)
- 3.4.2 Assumptions and Dependencies

2 SCOPE

2.1 IN SCOPE

This document details the plan for analysis, solution development, assessment and consultation on the changes required to the DAM for EES. The DAM is part of the REC Data Specification and is a Category 2 document.

This Change Proposal Plan considers the activities required to develop a revised DAM, with defined EES User Categories and the data items that are to be permitted under each. The revised DAM may also include updates to data item naming when compared with the existing matrix.

It will also consider if changes are needed to the Data Access Schedule which sets out the governance of the DAM.

2.2 OUT OF SCOPE

This Change Proposal will potentially require technical changes to the access controls of EES; however, we are not seeking to introduce any changes in functionality for EES Users or REC Parties.

This Change Proposal Plan does not consider changes to data item names in EES itself.

3 PROJECT STRUCTURE AND ORGANISATION

3.1 POINTS OF CONTACT

LEAD ANALYST	Harriet Truss	EMAIL	020 3934 8744
TECHNICAL LEAD	Michael Taylor	EMAIL	07824 072 981
ASSURANCE LEAD	Cristina Bermudez Alvarez	EMAIL	n/a

3.2 REQUIRED ACTIVITIES

3.2.1 ANALYSIS / SOLUTION DEVELOPMENT

Analysis is required of the current EES data permissions, which have often been assigned to EES Users on a case-by-case basis.

The review of current access arrangements will establish the variability within EES User Category populations. For example, the difference in data access between various Price Comparison

Websites. This will quantify the impact of standardising data permissions within an EES User Category and inform the change implementation approach.

Furthermore, this analysis will determine what data access is appropriate and the conditions under which data can be accessed. The EES Provider has submitted the required information and analysis is already underway. As a result, only a limited amount of additional time will be required to complete the required analysis before considering the appropriate solution options.

The intended outputs will include a new version of the DAM with aligned/consistent access for EES Users in the same EES User Category. This may include changes to the REC, if there is a need to amend the EES User Categories set out in the Data Access Schedule or the wider Data Access arrangements. The Code Manager is currently working alongside RECCo and Xoserve to apply the required REC V3.0 amendments to the gas Data Permissions Matrix (DPM) and review how data is presented. The DPM presentation review will feed into improvements progressed through this Change Proposal. This will ensure that both Gas and Electricity data matrices have a common look and feel. Furthermore, applying this methodology will allow for the future merging of the data matrices into a dual fuel record, should it be required. The DPM review was concluded in February 2022, as such it has little, to no, impact on this Change Proposal progression.

3.2.2 IMPACT ASSESSMENT

REC Parties and all EES Users have been identified as impacted by this change. A Party Impact Assessment has been included in the plan so that we can understand any material impacts to business operations by the proposed changes to EES access for Parties. Not all EES Users are REC Parties, therefore the Impact Assessment will be open to non-REC Parties to allow for any relevant responses from these users to be considered.

The EES Provider, will be impacted by this change and will need to configure any EES User Categories, each EES User Category's data items and apply EES User access once the DAM has been updated and approved.

We believe that the Party Impact Assessment should be triggered before a Service Provider Impact Assessment. This will allow for consideration of party views on the EES User Categories, allocated data items and consideration of possible requirements for a transitional implementation plan to be appropriately assessed by the EES Provider.

3.2.3 PRELIMINARY ASSESSMENT

Following conclusion of the impact assessments, the responses will be considered and, where relevant, the solution and legal text will be refined. Consideration will also be given to a phased implementation to allow for material impacts to REC Parties identified during Impact Assessment, whilst not delaying updates to access that can and should be applied.

To provide the RECCP with a recommendation from the appropriate technical experts, as part of the preliminary assessment activity the solution will be presented to RECTEP for them to review and endorse.

Following this, the Preliminary Change Report will be published with a summary of the activities completed, the proposed solution and plan for consultation.

3.2.4 FINAL ASSESSMENT

Following the consultation period, time has been included in the plan for a review of any consultation responses received and for these to be addressed prior to publishing the Final Change Report for decision.

3.3 STAKEHOLDER ENGAGEMENT PLAN

3.3.1 IMPACT ASSESSMENT PLAN

A standard 15 Working Day Party Impact Assessment (Party IA) period has been included in the plan. The Party IA was published on 01 April 2022 and went out to all EES Users (REC Parties and non-REC parties).

A 13 Working Day Preliminary Impact Assessment (PIA) from the EES Provider has been included in the plan, allowing for consideration of multiple EES solution options. This PIA was initiated on 12 May 2022.

Following the identification of the preferred solution and approval of the cost for completion of the Detailed Impact Assessment (DIA), the EES Provider will then complete their DIA on the preferred solution. The DIA was requested on 01 July 2022 following approval of the associated costs from the RECCo Change Advisory Board.

Time has also been allowed in the plan to reconcile the Service Provider response with REC Party and EES User impacts, enabling refinement of the solution if required.

3.3.2 CONSULTATION PLAN

The Code Manager believes that it will be appropriate to have a phased implementation for this Change Proposal, which will see the DAM itself published in EMAR on the date of implementation, followed by a period of technical development by the EES Provider to activate the alignment of EES User access within the EES system. This means that the DAM can be used as the reference point for access being granted and maintained at the earliest opportunity. This is required by the Code Manager and the EES Provider to support the efficient application of operational processes regarding EES access.

This plan proposes a two-phase consultation, so that a significant delay to DAM publication can be avoided. A DIA is required for the technical application of the permissions captured in the DAM and not the DAM itself. The Code Manager therefore feels it is appropriate that whilst the DIA is underway, the Change Proposal should progress to a standard 15 Working Day consultation period for the DAM, the legal text changes, and the high-level solution for the technical application. This first consultation is expected to be issued on 22 July 2022.

This would be followed by an additional 9 Working Day consultation, on an updated PCR. This would include a more detailed cost-benefit analysis and any updates to the case for change and Code Manager recommendation prior to Final Assessment. The second consultation is expected to be issued on 18 August 2022.

Wider Non-Party REC Service Users will be notified of the consultation. The channels for engagement will be determined once the level of impact has been identified for these users.

3.3.3 ENGAGEMENT WITH REC COMMITTEES / SUB-COMMITTEES

As agreed with the Change Panel on 03 May 2022, this plan includes consultation with the RECTEP on two occasions, to support the development of the Code Manager's recommendation to RECCP:

- On 29 June 2022, to consider the Data Access Matrix itself, the legal drafting and the proposed high level EES technical solution for application of the access permissions
- From 02-05 August 2022, to consider the EES Provider's Detailed Impact Assessment and confirm their endorsement of the solution

This engagement has been included as an essential part of the preliminary assessment activity.

3.4 RAID

3.4.1 RISKS AND ISSUES

No.	RISK	NOTES	MITIGATION
R1	Data access changes once applied may have consequential impacts for Party business processes	This should be evident in Impact Assessment responses	Impact assessment responses will inform the final agreed solution and implementation approach
R2	Addition, amendment, and removal of EES User Categories could result in development requirements for the EES Service Provider resulting in longer implementation timescales	The extent of this will be informed by the analysis being completed	The planned Service Provider Impact Assessment will inform the extent of possible development requirements

No Issues have been identified that would affect progression of the Change Proposal Plan at this stage.

3.4.2 ASSUMPTIONS AND DEPENDENCIES

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A1	Each data item will have a unique name	The current DAM has multiple data items with the same name identifier	Validated - the proposed solution for the DAM references a unique name per data item

No.	DEPENDENCY	NOTES	STATUS
D1	Existing access provision issues can currently only rely on workarounds, that are not yet defined	Impacts granting EES access to new entrants	Workarounds currently being explored by the Code Manager
D2	Decisions by the RECCP will require endorsement of the solution by the RECTEP	RECTEP will be asked to review the solution during preliminary assessment	In plan for 29 June 2022
D3	Publication of the DAM is reliant on the full Change Proposal being approved for implementation	The technical requirements for updates to the EES system require time for the SPIA to be completed	Open – a split consultation period has been included in the plan to enable approval of the Change Proposal, and therefore publication of the DAM at the earliest opportunity
D4	RECCP support that a split consultation is the right approach and that a phased implementation is appropriate for this change	n/a	Closed – Change Proposal Plan approved on 21 June 2022

3.5 DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS

SUBMISSION DEADLINE	08/07/2022