PARTY IMPACT ASSESSMENT RESPONSES

R0022 – AMENDMENT TO REC DATA ACCESS MATRIX

DATE ISSUED	01/04/2022
RESPONSE DEADLINE	26/04/2022

QUESTION	RESPONDENT DETAILS	RESPONSE
1. Do you have any comments on the methodology used to design the new Data Access Matrix?	**IMServ Europe** Metering Equipment Manager	I believe the assumption that MEM's do not require access to data outside their portfolio is incorrect.
	Scottish Power Energy Networks Distribution Network Operator	We can see no reference to the methodology used to indicate why there has been a proposal to limit DNO access to only be able to review their own Portfolio. I do believe that SPEN have fed back previously (perhaps to the MRA) that we require Community access.
	Scottish Power Energy Retail Supplier	We don't agree with the portfolio mechanism as it will hinder resolution of queries and disputes. If it is to remain, they should extend to look at historical appointments as well as current. We have specific concerns about reliance on data from the D0312 (e.g. MAP ID) as this is a known area of data quality issues. Additionally, for MEM and DNO this will mean that the cross-meter tool will no longer work as intended.

2. Do you have any comments on the Data Access Matrix solution?	**IMServ Europe** Metering Equipment Manager	It's not clear from the documentation exactly how the new permissions structure would work, for example... Will there be any changes to the Meter History search function i.e. Will the MEM still be able to see the history when they are not appointed to manage the MSN? Will there be any restrictions to the Supplier, MEM & MAP history screens i.e. can we still view appointment details which pre-date our current MEM appointment? Where the D0155 we receive is future dated (often sent weeks before the MEM start date), will the MEM be able to view EES details before their appointment date has arrived?
	Scottish Power Energy Networks Distribution Network Operator	SPEN are supportive of aligning the matrix to allow parties to market participants to complete business processes, unfortunately by restricting the DNO access this will have the opposite effect.
	Northern Powergrid Distribution Network Operator	If we have understood the matrix correctly, DNOs will only have access to their own portfolio. If this is correct, this does not align to the current access DNOs have which is on a community basis. We believe that DNO's should continue to have access to a Community view rather than a Portfolio view as a Portfolio access prevents us from viewing other DNO records which will impact some operational processes and customer service. Please see responses to question 3 for further detail on the impacted processes.
	Scottish Power Energy Retail	See comments above on portfolio option.

	Supplier	
3. Will implementation of the updated Data Access Matrix have an impact on your business process? Please provide justification for your response	**IMServ Europe** Metering Equipment Manager	Yes, this is a list of work areas we believe would be impacted: • Incorrect/missing/duplicate MTD investigations - these issues often arise as a result of site visit activities, for example se send a Technician to address 'A' and ask them to replace meter 'X', but when on-site the Technician finds meter 'Y'. This then then triggers an investigation to establish the correct course of action, EES is the only tool the MEMs have available to resolve these issues, if the MEM cannot query MSNs/Addresses for MPANs where we are not appointed this prevents us from solving the Customers MSN miss-match issue. • Address related investigations - it's not unusual for properties to be changed in such ways that the metering arrangements change, for example units combined or office space converted into flats. These activities can directly impact the metering equipment; often unravelling the issues involves gaining an understanding of the work undertaken at site i.e. what new MPANs have been registered/MPANs disconnected. If the MEM can't view the details relating to these properties their investigations will fail. • Emergency work - We have bespoke arrangements with some Suppliers which involves carrying-out emergency work at sites i.e. Fire, Flood, tampering damage. We are asked to attend at very short notice and often out-of-hours. D0155 (appointment flows) process will have been triggered and dependent on the urgency may be sent as a flat file attachment to an email, but MTDs may not have been received and EES will not yet show UKDC as appointed. As MEM we use EES to access information such as address, current MSN and SSC etc. • Import/export metering equipment where the same MSN is shared across two MPANs with the possibility of different Suppliers and MOPs being appointed - When appointment issues occur the MEM will currently use EES

		to investigate/locate the appointed Suppliers/MEMs where concerns/issues arise. • Erroneous/missing appointment investigations - at any given time a MEM will have a volume of appointment issues to be addressed, these can include issues such as missing D0151s, and as a result the MEMs believe they are appointed, but EES does not reflect this. • Missing MTDs – frequently MEMs do not receive the MTDs from the outgoing MOP and a common reason is that they themselves did not receive them. This compromises the ability for actual data to be collected by the DC and such is the settlement impact that ELEXON has undertaken targeted audits into the process. Having access to the history of appointments for the mpan enables the MEM to attempt to obtain these from previous MEMs if desired. • Market validation - As MEM we will use EES to check D0155 received is in the correct market i.e. HH vs NHH, this is particularly relevant for CoMC scenarios where confirmation of the correct market is required. • Customer support - Whenever new meters are installed by MEMs they label the new meters with the installing company and contact phone number, these labels are not changed when the Supplier and MEM churn. If there is a problem at site (i.e. OOH power outage) the customer will frequently phone the number left on the meter by the installing MEM, rather than the current MEM or Supplier. The MEM may look at our own database and conclude that we are no longer appointed, but simply telling the person on the phone that we cannot help can be inappropriate given the distress the situation may be causing. In these situations, we will use EES to check the current appointed MEM, Supplier and LDSO for the customer and pass on the necessary information they need to resolve their issue, please consider that the person making the

		call may not know who the Supplies is, without access to EES we would be unable to help customers in this way. • Investigating and resolving rejected D0312/D0304 - issues may become more difficult to manage, for example if a D0304 is rejected with code L or M we will be unable to look in EES at the historical MOP appointments to try to understand why our appointments are miss-aligned. • BSC Trading Disputes - In addition to the above them MEM's are also required to carry out Trading Dispute investigations (managed by Elexon): often these investigations are complex and involve some of the scenarios mentioned above, and limited access to EES could restrict the MEMs ability to carry-out these investigations
	Scottish Power Energy Networks Distribution Network Operator	By updating the Matrix as it currently stands this will have a detrimental impact on DNO business processes. There will potentially be MPANs created within our GSP Area that we have no visibility of (embedded networks). By limiting access to the DNO Portfolio view this restricts the access that we currently have and will mean that there are a number of Customer Service issues that we would be unable to resolve. We utilise EES in the event of 'network faults' to identify customers, who are not on our network we would not be able to verify that the customer has a valid MPAN and that they are connected to our Network. We also receive customer queries relating to MPANs that involve embedded Networks and DNO sites that straddle postcode areas, whereby there is no MPAN or a duplicate has been created in error. We would be unable to view the MPAN information to allow us to contact the other party to resolve. This view is also beneficial in terms of potential theft investigations.

		As a DNO we would require access to the Community view to be able to resolve these queries for the Customer/Settlements and for our own internal system integrity. We would also potentially use this for tracking Capacity management on Embedded Networks at a high level. We cannot hold MPANs for Embedded Networks on our MPRS system, so it is imperative that we have a view of them on EES
	Northern Powergrid Distribution Network Operator	The implementation of the Data Matrix will have a detrimental impact on our business processes as we currently reference other DNOs records for scenarios such as: • Crossed meters queries/resolution; • Identifying iDNO customers in our DNO area and referring them to the correct iDNO (prevalent during the recent storm events when dealing with loss of supply reports and subsequent claims); • MPANs created in the wrong DNO area - identification/resolution; • MPANs that have incorrect addresses i.e., updated to be in the incorrect distribution area; • Referring supplier queries/requests to the correct DNO These processes are important and not being able to access the Community view of data will hinder our ability to operate these processes and impact the service we provide to customers.
	Scottish Power Energy Retail Supplier	As a supplier it will impact us as our MEMs and MAPs will be unable to resolve our queries if they cannot see our historical information.
	IMServ Europe	Restricting access would certainly change the way we work today, many of the value added activities we offer Suppliers will no longer be possible.

4. Do you believe that your access to EES data may change in a way that is detrimental to your business? Please provide justification for response	Metering Equipment Manager	Suppliers, customers and regulators have come to assume that MEMS will be proactive in order to prevent exceptions or assist with exceptions (rather than simply fulfilling Code requirements)and EES is a vital tool required to enable this. Investigations which we as MEM are currently able to undertake will not happen and will likely be passed back to the Suppliers, who may not be best placed to conduct.
	Scottish Power Energy Networks Distribution Network Operator	By updating the Matrix as it currently stands this will have a detrimental impact on DNO business processes. There will potentially be MPANs created within our GSP Area that we have no visibility of (embedded networks). By limiting access to the DNO Portfolio view this restricts the access that we currently have and will mean that there are a number of Customer Service issues that we would be unable to resolve. We utilise EES in the event of 'network faults' to identify customers, who are not on our network we would not be able to verify that the customer has a valid MPAN and that they are connected to our Network. We also receive customer queries relating to MPANs that involve embedded Networks and DNO sites that straddle postcode areas, whereby there is no MPAN or a duplicate has been created in error. We would be unable to view the MPAN information to allow us to contact the other party to resolve. This view is also beneficial in terms of potential theft investigations. As a DNO we would require access to the Community view to be able to resolve these queries for the Customer/Settlements and for our own internal system integrity. We would also potentially use this for tracking Capacity management on Embedded Networks at a high level.

		We cannot hold MPANs for Embedded Networks on our MPRS system, so it is imperative that we have a view of them on EES
	Northern Powergrid Distribution Network Operator	Our access to EES data will change in a detrimental way as we will have a Portfolio view rather than Community as we do now. We believe that DNOs should continue to have a Community view to maintain customer service and support operational processes.
	Scottish Power Energy Retail Supplier	As a supplier no however please see Q3 response. There is a risk integrated businesses rely on supply access only and do not differentiate between market roles.
5. Do you have a preference for a Big Bang implementation or a Phased implementation? - Big Bang would mean that the data access matrix, data access schedule and changes to access would all be implemented on the same date. - a Phased implementation would allow for access updates made by the	**IMServ Europe** Metering Equipment Manager	No preference
	Scottish Power Energy Networks Distribution Network Operator	We have no preference relating to the Implementation approach only issues relating to the matrix as it currently stands for DNO access
	Scottish Power Energy Retail Supplier	No preference but needs to be carefully communicated with plenty of notice to avoid any impacts.

EES provider to be managed and prioritised according to business impacts within an agreed timeframe following the publication of the data access matrix and data access schedule on the implementation date. Please provide justification for your response		
6. If your access will change as a result of the new Data Access Matrix are there any dates/ lead times on which successful implementation is dependent?	**IMServ Europe** Metering Equipment Manager	No
	Scottish Power Energy Networks Distribution Network Operator	SPEN do not agree with the DNO changes to the matrix
	Scottish Power Energy Retail Supplier	As a supplier this is not applicable by recommend you contact each party with access to ensure they are aware of the change and confirm impacts rather than relying on responses to this IA.

7. Would implementing this change incur any costs to your business? if so, please provide details	**IMServ Europe** Metering Equipment Manager	We don't think the cost can be measured by Development, Implementation or Operational time/money, instead the cost is relates to our ability to provide a quality service for Suppliers, End-users and Settlements. Restricting the MEMs ability to investigate and resolve Settlement impacting issues may have a cost in this respect, unfortunately it's not possible to put a value on this.
	Scottish Power Energy Networks Distribution Network Operator	If this change was made, we anticipate that this would potentially require the implementation of a number of workarounds to current processes, and FTE to manage these. We believe that this would be untenable as it may result in high volumes of calls or SDEP queries being raised with other parties, this would result in a poorer customer service level than we currently have. We have at this point not been able to assess the impact of this, although suffice to say it crosses several business areas.
8. Can you identify any benefits to your business by implementing the proposed changes? Please provide justification for your response	**IMServ Europe** Metering Equipment Manager	We are unable to identify any benefits to MEMs.
	Scottish Power Energy Networks Distribution Network Operator	There is no benefit to SPEN in the revision as currently written, only a detriment to our business.
	Northern Powergrid Distribution Network Operator	There are no benefits to our business in implementing this change, only detrimental impacts.

	Scottish Power Energy Retail Supplier	None.
9. Considering any costs and benefits identified, do you believe the change should be made? Please provide justification for your response	**IMServ Europe** Metering Equipment Manager	For the reasons stated above, we feel that restricting MEM access is a back-wards step, we believe that full access should be maintained for the MEM role.
	Scottish Power Energy Networks Distribution Network Operator	SPEN do not agree with the matrix as currently written as this causes us issues in terms of managing our MPAN portfolio and supporting customer enquiries. We do however agree with the principal of the change.
	Scottish Power Energy Retail Supplier	Difficult to justify the cost at this time in the industry. We would welcome improving the non-domestic access rights as a clear GDPR issue, but the rest we see limited or no benefit.
10. Do you have any other comments relating to this Change Proposal?	**IMServ Europe** Metering Equipment Manager	No
	Scottish Power Energy Networks Distribution Network Operator	No additional comments

	Scottish Power Energy Retail Supplier	We have concerns not all ECOES users will be aware of this change and should be shared with all ECOES MAUs as a minimum.