CONSOLIDATED CONSULTATION RESPONSES

R0022 – AMENDMENT TO REC DATA ACCESS MATRIX

To support the proposed implementation approach, the Change Proposal Plan set out a two-phase consultation, so that a significant delay to publication of the DAM can be avoided. The Code Manager therefore planned for the Change Proposal to progress to a standard 15 Working Day consultation, whilst a Detailed Impact Assessment was progressed on the technical elements of the solution. These technical elements are only for changes to the EES System and how access permissions, captured in the Data Access Matrix (DAM), are applied and not the DAM itself.

1 FIRST CONSULTATION

The first consultation on the Preliminary Change Report covered the DAM, the legal text changes and the high-level solution for the EES system changes.

DATE ISSUED	10/06/2022
RESPONSE DEADLINE	01/07/2022

QUESTION	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
1. Do you agree with the proposed solution? If not, please explain why	Electricity North West Limited Distribution Network Operator (DNO)	We agree with the previous feedback from other DNOs during the impact assessment as follows: • we do not support that the EES User Categories listed should have a Portfolio View • maintaining a community view is essential to business processes to resolve queries and disputes • a risk identified that integrated businesses rely on Supplier based access for other Market Roles • potential risk that not all EES Users will be aware of the proposed changes if the CP is not shared with all EES Users • the lead times and communication need to be carefully managed to minimise impacts of access changes • No benefits were identified and cost to implement the changes were challenged No, we do not agree with the proposed solution as we can find no identified benefits.	This response refers to the draft solution that was put forward for Party Impact Assessment. Following feedback and the evidence provided, the solution was refined and the majority of the listed EES User Categories are provided with a Community View in the solution that is being taken forward. The following have all had their Community View maintained in the proposed solution: Metering Equipment Manager (MEM) Distribution Network Operator (DNO) Data Collector (DC) Meter Administrator (MA) Meter Asset Provider (MAP) Prepayment Meter Infrastructure Provider (PPMIP)
	IMServ Metering Equipment Manager (MEM)	Yes	
	Western Power Distribution DNO	Yes we agree with the proposed solution.	

	Northern Powergrid DNO	Yes	With regards to TPI access, the Code Manager refers to p.11 of the Preliminary Change Report - Third Party Intermediaries (TPIs) should ensure that they are only accessing EES data for the purposes where they have the appropriate legal basis, consent, in place and as detailed in their access application. The application process includes an information security and data protection assessment before any access is granted.
	Orsis Limited Meter Asset Provider (MAP)	Yes	
	Inenco Ltd Third Party Intermediary (TPI)	Yes – If I understand the proposal correctly then this will allow TPIs to have access to more data about customers assets. This should assist with Meter issues and supplier queries.	
	Utilita Energy Limited Energy Supplier	Yes.	

2. Do you agree with the proposed legal text? If not, please explain why?	IMServ MEM	Yes	N/A
	Western Power Distribution DNO	Yes we agree with the proposed Legal Text.	
	Northern Powergrid DNO	Yes	
	Orsis Limited MAP	Yes	

	Inenco Ltd TPI	I am not a lawyer so I don't feel able to advise.	
	Utilita Energy Limited Energy Supplier	Yes.	

3. Do you agree with the proposed presentation of the Data Access Matrix? If not, please explain why.	IMServ MEM	Yes Observation: Possibly the DAM could show when ESS users are not limited to a portfolio view i.e. they can see data regardless of appointments.	Row 3 in the DAM details whether an EES User Category has a Community or a Portfolio View The history of suppliers view made available in EES is created from the same data items, but is based on the data of previous suppliers. No additional access permissions need to be specified in the DAM.
	Western Power Distribution DNO	Yes we agree with the proposed presentation of the Data Access Matrix.	
	Northern Powergrid DNO	Yes	
	Orsis Limited MAP	Yes	
	Inenco Ltd TPI	I can't see the history of suppliers. Should this be in the matrix? If not – why not. I assume that it will remain available to web users. Not sure if this is relevant here but can the API functionality be increased to include certain items like the history of suppliers.	

		Again not sure if relevant here, but can you stop "flipping" the fields (e.g. supplier ID – DC MOP etc) when the mouse hovers near those fields. We need both names to be visible at all times and both fields to be printable – currently when the user prints off a screen these fields are ruined because both items are printed together thus rendering that field un- readable.	It isn't in scope of R0022 to look at the specific access methods to EES data or the functionality for how the data is displayed. Any requests or suggestions received in this consultation will be passed to the appropriate team in the Code Manager. Any specific requests should be raised independently from the Change Proposal, enquiries@recmanager.co.uk Access to Registration Status data in EES has been determined by the Switching Programme and is outside the scope of R0022. The Code Manager will look at whether this needs to be raised as a REC Issue.
	Utilita Energy Limited Energy Supplier	Registration Status data is not accessible for MEMs but could be necessary with same day switching. This should be reconsidered for MEMs who will be attending meter installations or site investigations and need to confirm Registration Status isn't about to change at the time of installation.	

	IMServ MEM	Yes	

4. Do you agree with the proposed access permissions set out in the Data Access Matrix? If not, please explain why.	Western Power Distribution DNO	Yes we agree with the proposed access permissions set out in the Data Access.	Please see note above regarding legal basis for access to EES data.
	Northern Powergrid DNO	Yes	
	Orsis Limited MAP	Yes	
	Inenco Ltd TPI	I agree with anything that allows TPI's (with customer permission of course) to gain full access to the data regarding their meter assets.	
	Utilita Energy Limited Energy Supplier	Yes.	

5. Do you agree with the proposed implementation date and implementation techniques? If not, please explain why.	IMServ MEM	Yes	Please see note above regarding suggestions regarding method or access.
	Western Power Distribution DNO	Yes we agree with the proposed implementation date and techniques.	
	Northern Powergrid DNO	Yes	
	Orsis Limited MAP	Yes	

	Inenco Ltd TPI	Yes. Just need to allow improved access for API service payees.	
	Utilita Energy Limited Energy Supplier	Yes.	

6. 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 REC Change Panel?	IMServ MEM	Yes	N/A
	Western Power Distribution DNO	Yes we agree that this Change Proposal should be subject to Self-Governance approval	
	Northern Powergrid DNO	Yes	
	Orsis Limited MAP	Yes	
	Inenco Ltd TPI	Yes	
	Utilita Energy Limited Energy Supplier	Yes.	

7. Do you agree with the Code Manager's assessment of the case for change and	IMServ MEM	Yes	
	Western Power Distribution	Yes we agree that this Change Proposal should be approved for implementation on 4th Nov	

the minded-to position that this Change Proposal should be approved for implementation on 4 November 2022? If not, please explain why?	DNO		
	Northern Powergrid DNO	Yes	
	Orsis Limited MAP	Yes	
	Inenco Ltd TPI	Yes	
	Utilita Energy Limited Energy Supplier	Yes.	

8. Do you have any other comments relating to this Change Proposal?	IMServ MEM	No	Address maintenance and data accuracy queries are not within the scope of R0022. The Code Manager will look at whether these need to be raised as a REC Issue(s).
	Northern Powergrid DNO	N/A	
	Orsis Limited MAP	Not specifically this change proposal but as a general comment, Orsis attend many sites throughout the UK and are surprised by the lack of maintenance on the address details and in some cases the meter serial number has been recorded incorrectly making searches more difficult. It would be beneficial if a process could be adopted to amend the system to correct inaccuracies and a section provided to detail a meter location.	

	Utilita Energy Limited Energy Supplier	No further comments.	

2 SECOND CONSULTATION

Following the completion of the DIA, the Preliminary Change Report was updated and presented to the Change Panel on 16 August 2022**.** That report included a more detailed cost-benefit analysis and confirmed the case for change and Code Manager recommendation.

The second consultation covered the updates made to the Preliminary Change Report in consideration of the technical EES System solution.

DATE ISSUED	18/08/2022
RESPONSE DEADLINE	02/09/2022

1. The Preliminary Change Report has been updated to consider the Detailed Impact Assessment for the technical elements of the solution. With these updates in mind, do you agree	Northern Powergrid DNO	Yes	N/A
	Western Power Distribution DNO	Yes we are in agreement with the technical EES solution proposed.	

with the technical EES solution proposed? If not, please explain why.			

2. When considering the technical EES solution, do you agree with implementation technique, namely that the EES system updates should be progressed as part of a second implementation phase, with specific dates to be confirmed following CP approval and appropriate planning activity? If not, please explain why.	Northern Powergrid DNO	Yes	N/A
	Western Power Distribution DNO	Yes we agree with the implementation technique.	

	Northern Powergrid DNO	Yes	N/A

3. Do you agree with the Code Manager that the technical EES solution does not change the assessment of the Change Path, which is that this Change Proposal should be subject to Self-Governance approval by the REC Change Panel?	Western Power Distribution DNO	Yes we agree	

4. Do you agree with the Code Manager that the technical EES solution does not change the assessment of the case for change and the recommendation that this Change Proposal should be approved for implementation on 4 November 2022?	Northern Powergrid DNO	Yes	N/A
	Western Power Distribution DNO	Yes we agree	

If not, please explain why?			

5. Do you have any other comments relating to this Change Proposal?	Northern Powergrid DNO	No	N/A