RETAIL ENERGY CODE

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

INITIAL ASSESSMENT REPORT

R0022 – AMENDMENT TO REC DATA ACCESS MATRIX

DOCUMENT VERSION	1.0
DATE ISSUED	04/02/2022
DOCUMENT APPROVAL STATUS	APPROVED BY REC CHANGE PANEL
RESPONSIBLE COMMITTEE	TECHNICAL EXPERT PANEL

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).

	High Impact: N/A
	Medium Impact: EES Users, EES Provider
	Low Impact: N/A

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1 SUMMARY

The Retail Energy Code (REC) Data Access Schedule sets out the approach to provision of market data via the Electricity Enquiry Service (EES). This will be extended to cover the Gas Enquiry Service (GES) at Central Switching Service (CSS) go live. The schedule categorises EES Users, e.g. REC Service Users and Non-Party REC Service Users of the EES, and sets out the principle that a defined set of data will be accessible to EES Users depending on their EES User Category. The specific data items accessible for each EES User Category are set out in the Data Access Matrix (DAM). This approach differs from the previous arrangements under the Master Registration Agreement (MRA) where data accessible by users would be agreed on a case-by-case basis. This has led to differences between data accessed by different organisations within the same EES User Category.

Following the transfer of governance from the MRA to REC, an activity has been initiated to review the historic data access agreements. This has identified areas where data access is not being provided as intended under the Data Access Schedule. Although there is a defined list of data items accessible to each EES User Category, it also currently reflects the bespoke access agreements that have been carried over. There are potentially some instances where restrictions have been placed on accessibility of data which cannot be justified. The Code Manager has also identified that there are some inconsistencies of data item names between the DAM and EES itself. These should be considered as part of this Change Proposal.

The Code Manager has found that the inconsistencies in data accessible to EES Users means that REC Parties, particularly new market entrants may be unable to complete business processes and might miss performance targets. Without a revised DAM, the EES Service Provider cannot provide or amend system-based access (via an Application Programming Interface (API)) for impacted REC Parties, who must rely on manual user access in the interim.

The EES Provider has submitted the required information on existing data access arrangements and analysis is already underway.

Where possible and appropriate, it is proposed that the final agreed solution for this Change Proposal should support alignment between gas and electricity.

2 PROBLEM STATEMENT

There is currently a lack of clarity regarding the data items that should be accessible by each EES User Category and there are potentially some instances where restrictions have been placed on the accessibility of some data items that cannot be justified.

The Data Access Matrix does not currently provide a single standardised role-based framework for EES Users' access to data. This means that the EES Provider cannot provide EES Users with the appropriate access for their role. This may result in operational issues for new entrants to the market and parties wishing to amend their API access arrangements.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As an Electricity Consumer, I want data associated with my electricity supply to be made consistently available to Market Participants so that I receive the same level of service whoever supplies my electricity or looks after my meter.
MARKET PARTICIPANT USER STORIES	
M1	As an EES User, I want to have access to all the data items appropriate to my EES User Category so that I can operate processes without disruption, to provide a good service to my customers and meet my performance targets.
M2	As the EES Provider I want to have clarity on the data items that I should provide to EES Users appropriate to their role.
M3	As the Code Manager I want Market Participants to have access to appropriate data in EES so they can complete business processes and meet performance targets, while ensuring access to data is subject to appropriate security and controls.

4 IMPACTS

REC PARTIES AND SERVICE USERS
EES Users

REC SERVICE PROVIDERS
Electricity Enquiry Service Provider

CONSUMERS
Electricity Consumers
Non-Domestic Consumers (for Portfolio Access)

REC DOCUMENTS / PRODUCTS
Schedule 12 – Data Access
Data Specification – Data Access Matrix

RECCO AND REC CODE MANAGER
REC Code Manager

REC Parties may be impacted through the standardisation of the EES User Categories for each Market Participant Role. Any permission changes may also have an impact on EES data access for one or more of the following Non-Party REC Service Users, as outlined in Data Access Schedule:

- Third Party Intermediary Service Providers;
- Non-Domestic Consumers (for portfolio access);

- Local Authorities in Great Britain;
- UK Government Department of Work and Pensions;
- HM Revenue and Customs, UK police forces and other law enforcement agencies;
- the UK Office for National Statistics;
- the Energy Theft Tip-Off Service Provider;
- the UK Revenue Protection Association;
- Citizens Advice/ Citizens Advice Scotland, and the Energy Ombudsman;
- the Microgeneration Certification Scheme Service Company;
- the Alt HAN Company (established under the Smart Energy Code); holder of smart meter communications licence?
- Energy UK
- the BSC Technical Assurance Agent
- the Authority
- the Code Manager; and
- managers or administrators of other Energy Codes.

At this time impacts are not expected to the Data Access Schedule, however, until analysis of the existing arrangements is complete and the solution is defined this cannot be confirmed.

This Change Proposal is anticipated to have a positive impact on Code Manager operational and assurance activities relating to applications for EES access. Because of the current gaps in the DAM, the Code Manager is not able to approve access, and the details of which level of access to assign, to the EES Provider. In turn, the EES Provider is not able to provide or amend the associated API access to EES Users. The gaps also mean that the Code Manager does not have the necessary framework against which it carries out the Data Access assessment as part of the Service Provider assurance activity.

4.1 CROSS CODE IMPACTS

This change is specific to access arrangements for the EES which is under the governance of the REC. At this stage no cross-code impacts have been identified. EES Users within Code Bodies are however included in the engagement plan for impact assessment and consultation.

5 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	SELF-GOVERNANCE
RESPONSIBLE COMMITTEE	TECHNICAL EXPERT PANEL

This Change Proposal primarily impacts the Category 2 document Data Access Matrix. We propose therefore, that the Responsible Committee for this Change Proposal should be the Technical Expert Panel (TEP). If following solution development, changes are required to the REC Data Access Schedule then we will consider if the TEP remains the appropriate Responsible Committee to consider this Change Proposal, or if this should be decided by the Change Panel.

6 PRIORITY STATUS AND URGENCY

PRIORITY STATUS	MEDIUM
URGENCY	STANDARD

The Priority Status for this Change Proposal is 'Medium' based on a 'Significance' score of 1 and an 'Urgency' score of 1. This is broken down as below:

Significance:

- Legal/Regulatory Compliance – score of 1 to reflect a minor improvement to RECCo's ability to meet obligations to provide access to data via the EES.
- Strategic Direction – score of 1 to reflect a minor improvement to the REC's ability to meet EES data provision requirements under the Data Access Schedule.
- Consumer Impacts – score of 1 to reflect a minor improvement to protection of Consumer data through a robust framework of permissions under the Data Access Matrix. While this Change Proposal does not directly influence the consumer experience, it supports the efficient operation of Parties in serving Consumers through correct access to EES data.
- Operational Efficiency – score of 2 to reflect a moderate improvement to the service by the EES Service Provider and Code Manager to amend and control appropriate data access to EES Users.

Urgency:

- This Change Proposal has been given an urgency score of 1 to reflect the ambition for this change to be progressed to align as closely as possible to REC Version 3 go live and to support associated operational issues.

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PRIORITISATION MATRIX

Significance	Score	Weighting
Legal/Regulatory Compliance	1	30
Strategic Direction	1	20
Cost Benefits / Value	0	10
Consumer Impacts	1	30
Operational Efficiency	2	10

Urgency

3	N/A	13	23	33
2	02	12	22	32
1	01	11	21	31
0	00	10	20	N/A

Significance

Weighted Significance Score	1
Urgency	1
Overall Priority Score	**11**

Effort	1 - Moderate

Priority Score	Priority Status
23 - 33	Critical
13 - 22	High
11 - 21	Medium
00 - 10	Low

PRIORITY STATUS
Medium

7 SUMMARY OF CHANGE PROPOSAL PLAN

The Change Proposal Plan allows for analysis of the current EES data permissions. The analysis will determine what data access is appropriate and the conditions under which data can be accessed; will show the impact of standardising data permissions within an EES User Category; and, inform the change implementation approach.

Analysis has already started following provision of data by the EES Service Provider and pre-existing activity to review data access arrangements. Analysis is expected to complete soon after acceptance of the Change Proposal Plan by the Change Panel. The solution development will provide a new version of the DAM and, if necessary, any amendments to the Data Access Schedule or wider access arrangements.

Once analysis and solution development have completed, the plan allows for both REC Party and Service Provider Impact Assessments. We consider a standard 15 Working Day Party Impact Assessment period to be appropriate and the Service Provider Impact Assessment is expected within 10 Working Days. Solution refinement and any required Legal Drafting will then be followed by a Preliminary Assessment and the publication of the Preliminary Change Report. The plan for consultation and decision will be considered and detailed in the Preliminary Change Report.

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KEY MILESTONES

	FROM	TO
ANALYSIS & SOLUTION DEVELOPMENT	16/02/2022	28/03/2022
PARTY IMPACT ASSESSMENT PERIOD	01/04/2022	26/04/2022
SERVICE PROVIDER IMPACT ASSESSMENT PERIOD	12/05/2022	26/05/2022
SOLUTION REFINEMENT AND PRELIMINARY ASSESSMENT	27/05/2022	14/07/2022
DEADLINE FOR ALTERNATIVE CHANGE PROPOSAL SUBMISSION	15/07/2022	15/07/2022
PRELIMINARY CHANGE REPORT PUBLISHED	15/07/2022	15/07/2022
TECHNICAL EXPERT PANEL REVIEW	27/07/2022	27/07/2022

8 GLOSSARY

TERM	DEFINITION
Data Access Matrix	means the matrix describing which EES Data each EES User Category can access, which forms part of the Data Specification and is updated in accordance with the Data Access Schedule.
Electricity Enquiry Service (EES)	Electricity Enquiry Service EES means the service described as such in the EES Service Definition.
Electricity Enquiry Service (EES) User	means a Party or Non-Party REC Service User which is entitled to use the EES under the Data Access Schedule.
Electricity Enquiry Service (EES) Provider	means the provider of the Electricity Enquiry Service.
EES User Category	means each category of user of the EES, as described in Paragraph 4 of the Data Access Schedule. “EES User Categories” shall be construed accordingly.
Non-Party REC Service User	means, for a REC Service, an entity which is not a Party under this Code, but which has become a REC Service User for that REC Service.
Performance Assurance	means the activities undertaken by the Code Manager and the REC PAB in accordance with the Performance Assurance Schedule.