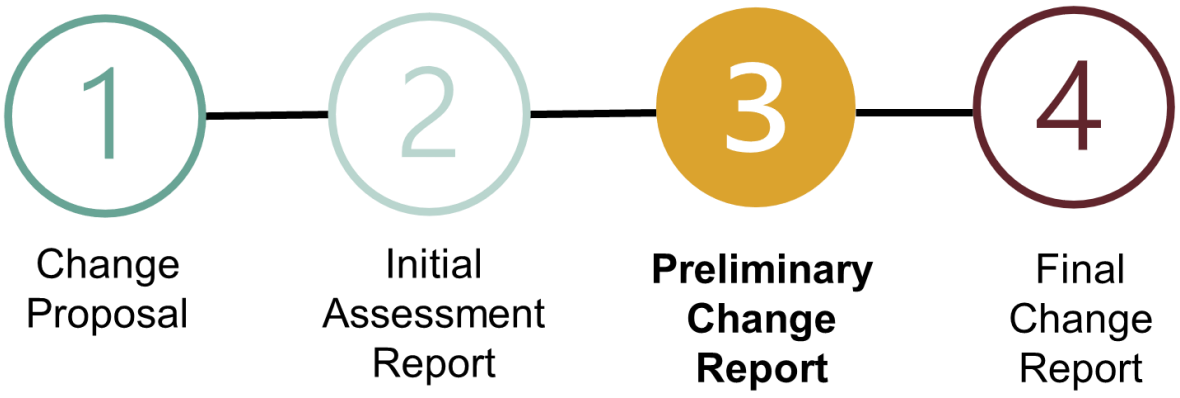
RETAIL ENERGY CODE

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PRELIMINARY CHANGE REPORT



PURPOSE:	The Preliminary Change Report is drafted by the Code Manager when a Change Proposal has a fully formed solution that has been sufficiently assessed to allow a decision to be made on whether this should be approved for implementation. The report includes a summary of the Change Proposal, details of the proposed solution and the Code Manager's view on the case for change and recommendation.
NOTES:	The report sets out the minded-to position, prior to formal consultation, and may be changed when publishing the Final Change Report.
NEXT STEPS:	The Preliminary Change Report will be issued for consultation. Following this, the Code Manager will produce a Final Change Report and the Responsible Committee will make a decision on whether to approve the Change Proposal.

RETAIL ENERGY CODE

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

PRELIMINARY CHANGE REPORT

R0022 – AMENDMENT TO REC DATA ACCESS MATRIX

DOCUMENT VERSION	3.0
DATE ISSUED	18/08/2022
DOCUMENT APPROVAL STATUS	APPROVED BY RESPONSIBLE COMMITTEE

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 to update to the Data Access Matrix (DAM).

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0022 is **APPROVED** for implementation on 04 November 2022.

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

RETAIL ENERGY CODE

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BACKGROUND

1 SUMMARY

The Retail Energy Code (REC) Data Access Schedule sets out the approach to the provision of market data via the Electricity Enquiry Service (EES).

The schedule categorises EES Users (REC Parties and Non-Party REC Service Users) and sets out the principles of data access. 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 access was agreed on a case-by-case basis. R0022 aims to resolve the access variability within EES User Categories, update EES so that its data architecture reflects the Data Access Schedule, and to improve the processes whereby new EES Users are provided with access.

It should be noted that the Data Access Schedule has been extended to cover the Gas Enquiry Service (GES) following CSS Go-Live. However, R0022 is only concerned with the electricity DAM, the DAM for GES is out of scope of this Change Proposal.

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 instances where data restrictions have been placed on EES Users which cannot be justified.

The DAM does not currently provide a single standardised role-based framework for EES Users' access to data. This means that the Code Manager and the EES Provider cannot grant and provide EES Users with standardised access for a particular role. This may also result in operational issues for new entrants or can create a situation whereby EES Users in the same role have different 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 and relevant organisations, so that they have equal access to the data they use to supply my electricity or look 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 and relevant organisations to have access to appropriate data in EES so they can complete their business processes and, where applicable, meet performance targets, to ensure a better Consumer experience while ensuring access to data is subject to appropriate security and controls.

PROPOSAL

Following completion of a Detailed impact assessment (DIA) by the EES Provider, this Preliminary Change Report has been updated to reflect the full solution, including the technical elements that were excluded from v1.0. Updates are included in the following sections:

- 5.2 Service Provider Impact Assessments
- 7 Key Risks, Issues, Assumptions and Dependencies
- 8.5 EES Solution
- 13 Business Case Assessment
- 14 Case for Change
- 15 Code Manager's Recommendation
- 16 Consultation and Next Steps

4 SUMMARY OF ANALYSIS UNDERTAKEN

The Code Manager worked closely with the EES Provider to understand current EES User access, which has to date been based on bespoke Access Agreements.

Analysis was then undertaken to determine typical access within EES User Categories. This allowed the Code Manager to assess which Data Items were consistent across each EES User Category and to inform a first view of which Data Items should be made available by which category.

All analysis was considered in the context of RECCo's open data approach, as set out in the RECCo Strategy and Forward Workplan 2022-2025,[1] and General Data Protection Regulations in respect of Consumer's personal data.

[1] "The development of our services will have regard to general industry principles. Although we are not directly captured by the obligations placed upon network licensees to comply with Ofgem's recently revised Data Best Practice Guidance (https://www.ofgem.gov.uk/sites/default/files/2021-11/Data_Best_Practice_Guidance_v1.pdf), we will do so where relevant.
For instance, whereas applicants for access to the data held on the enquiry services have traditionally been limited to the data items for which it has express permission, we will pursue a change that embraces the principles of the data being presumed to be open for all people to use, unless there is specific evidence to show that it should be withheld, or its availability reduced."
P.16, RECCo Strategy and Forward Work Plan 2022-2025

5 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

5.1 REC PARTY IMPACT ASSESSMENTS

Development of the solution has been informed by a Party impact assessment (Party IA) which was published on 01 April 2022 and went out to all EES Users (REC Parties and non-REC Parties) and included all EES Master Admin Users.

A total of five responses, one of which was confidential, were received from REC Parties. They were from a mix of Energy Suppliers, Metering Equipment Managers (MEM) and Distribution Network Operators (DNO). Meter Asset Providers' and Data Collectors' views were represented within Energy Supplier and MEM responses. No responses were received from non-REC Parties.

The responses were broadly in support of the data presentation and legal text changes, however there was universal opposition to the proposal to limit certain EES Users to a Portfolio View (which allows access to data for a Metering Point only if the EES User has specified responsibility for that Metering Point). Respondents provided detailed evidence that limiting EES access in this way would severely impact their ability to perform issue resolution activities, perform emergency works and handle Consumer complaints.

The confidential response will not be published however, it has been considered in the Code Manager assessment.

The non-confidential responses have been consolidated and can be found on the Change Proposal Page on the REC Portal here.

METERING EQUIPMENT MANAGERS	• Do not support that the EES User Categories for MEMs, Data Collectors or Meter Asset Providers should be restricted to a Portfolio View • Maintaining a Community View is essential to business processes for issue resolution activities, performing emergency works and handling Consumer complaints • No preference was provided on the implementation approach • No benefits were identified
DISTRIBUTION NETWORK OPERATORS	• Do not support that the EES User Category for DNOs should be restricted to a Portfolio View • Maintaining a Community View is essential to business processes, customer service and settlement queries • Supportive of standardisation of access under the DAM • No preference was provided on the implementation approach • Lead times would be required to implement workarounds to business processes if access was changed to a Portfolio View • No benefits were identified
SUPPLIERS	• Do not support that the EES User Categories listed should be restricted to a Portfolio View

	• Maintaining a Community View is essential to business processes to resolve queries and disputes • 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 Change Proposal is not shared with all EES Users • No preference was provided on the implementation approach • Lead times and communication need to be carefully managed to minimise impacts of access changes • No benefits were identified and the cost to implement the changes was challenged

5.2 SERVICE PROVIDER IMPACT ASSESSMENTS

5.2.1 PRELIMINARY IMPACT ASSESSMENT

A preliminary impact assessment (PIA) was sought from the EES Provider. The impact assessment considered the overall solution (the DAM and schedule) as well as the impacts on the EES technical solution.

EES PROVIDER	• Two solutions were assessed. 1. Utilise the current EES structure, rough order of magnitude of £53.5k 2. Restructure EES to apply EES User Category access to users, rough order of magnitude of £72.5k • Implementation approach and timelines were provided under the detailed impact assessment (DIA) • Assumptions were provided were considered during the DIA

The solution proposes updates to the EES system so that access is linked to EES User Categories, thereby greatly simplifying the underlying architecture, and removing the risk of variable access within EES User Categories. The EES technical solution will not have any impacts on the DAM itself, nor how the permissions are presented in the matrix or legal drafting.

5.2.2 DETAILED IMPACT ASSESSMENT

A DIA was progressed to fully understand the time and costs associated with implementing Solution 2 within the EES system.

EES PROVIDER	• Confirmed the details for a solution that restructures EES so that EES User access can be managed by category within the system

	• Costs itemised as requested within the response, totalling £70.5k (reduced from £72.5k) • No ongoing operational costs identified, including for future additions of new EES User Categories • Supported implementation of system changes in appropriate timescales after the implementation of the DAM itself on 4 November 2022 – the project for system implementation will be planned with the Code Manager • Assurance testing to be completed by the Code Manager • Impacts to specific company groups' user experience cannot be confirmed until the Code Manager completes the mapping exercise to ensure company groups are assigned to the correct EES User Category

6 DELIVERY AGAINST CHANGE PROPOSAL PLAN

	PLANNED	COMPLETED
ANALYSIS & SOLUTION DEVELOPMENT COMPLETED	28/03/2022	28/03/2022
PARTY IMPACT ASSESSMENT ISSUED	01/04/2022	01/04/2022
SERVICE PROVIDER PRELIMINARY IMPACT ASSESSMENT ISSUED	12/05/2022	12/05/2022
SERVICE PROVIDER DETAILED IMPACT ASSESSMENT ISSUED	27/06/2022	01/07/2022
TECHNICAL EXPERT PANEL SOLUTION REVIEW	29/06/2022	29/06/2022
PRELIMINARY CHANGE REPORT PUBLISHED	08/07/2022	08/07/2022

Analysis, solution development, Party IA and the PIA from the EES Provider have been completed within the planned timescales.

The DIA was not issued on time as further details and clarifications were required within the proposed solution and requirements. The EES Provider was kept informed during the period of the delay and the subsequent replan dates were agreed together. The DIA was issued on 01 July 2022, however, due to prioritisation of post CSS Go-Live activities, the ESS Provider response was delayed by 4 days and not received until 22 July 2022.

All Assumptions captured in section 7.2 have been closed following the DIA.

7 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

7.1 RISKS AND ISSUES

No risks have been identified.

No.	ISSUE	NOTES	HOW TO PROGRESS
I1	The Code Manager did not issue the request for DIA to the EES Provider on the planned date.	The DIA has now been requested but subsequent plan dates may be impacted.	Closed - The Code Manager has adjusted activities so that key dates can be met to enable implementation on the same proposed date of 04 November 2022.

7.2 ASSUMPTIONS AND DEPENDENCIES

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A1	The method of access to EES data (GUI[2], API[3], reports, etc) is not determined by the Data Access Matrix	Method of data retrieval should not impact the available data.	Closed - Confirmed as part of the DIA
A2	Where an organisation has access as a Non-Domestic Consumer but also qualifies for access under a different EES User Category, their category will be confirmed by the Code Manager to the EES Provider.	Code Manager to confirm prior to implementation	Closed – Confirmed as part of the DIA
A3	The transition of EES Users to new EES User Categories will not impact the EES service		Closed - Confirmed as part of the impact assessment
~~A4~~	The REC considers that any EES Data Item should be available to EES Users unless there is a specific legal, data protection or commercial reason for access to be restricted.		Closed – validated with RECCo during solution development

[2] Graphical User Interface. This is the web-based access through https://www.ecoes.co.uk/
[3] Application Programming Interface

No.	DEPENDENCY	NOTES	STATUS
D1	The Code Manager recommendation in this report is dependent on the completion of the DIA.	An updated report will be published for consultation following the DIA where the recommendation will be validated or updated.	Closed – DIA completed and considerations included and updated in this report

8 PROPOSED SOLUTION

8.1 SOLUTION OVERVIEW

The Code Manager proposes to resolve the problem statement identified by addressing the following requirements as part of the Change Proposal solution development:

- Application of consistent formatting within the DAM, to provide a common look and feel when exploring the EES DAM or the GES DAM;
- Present information in a clear and concise manner to aid usability and facilitate the EES access application process;
- Review existing access arrangements to ensure suitability of EES User Categories outlined in the Data Access Schedule;
- Ensure any proposed access changes meet open data objectives specified by RECCo; and
- Allow for the alignment of EES system access and EES User Categories, to simplify and speed up the EES access application process.

Following analysis and solution development by the Code Manager, a draft solution was published for Party IA, to ensure the solution's suitability. Following the Party IA, the solution was reviewed and revised to take account of the responses received, resulting in an updated 'final' proposed solution. A summary of changes to the solution prior to being issued for consultation is provided here:

SOLUTION ELEMENT	DRAFT SOLUTION PRE-PARTY IA	PROPOSED SOLUTION POST IA
EES User Categories with Portfolio View	Metering Equipment Manager (MEM) Distribution Network Operator (DNO) Data Collector (DC) Meter Administrator (MA) Meter Asset Provider (MAP)	Non-Domestic Consumer

	Prepayment Meter Infrastructure Provider (PPMIP) Non-Domestic Consumer	
Single organisation EES User Categories	Not included in the DAM Legal text included	Included in the DAM Legal text removed
EES User Categories with postcode restricted access	Represented in DAM with a category condition	Represented in DAM with Portfolio View determined by postcode

8.2 DRAFT SOLUTION FOR PARTY IMPACT ASSESSMENT

The draft solution proposed changes to EES Data access, data presentation and amendments to REC Schedule 12 Data Access. Data access changes and data presentation changes are both reflected in the revised DAM.

8.2.1 DATA ACCESS CHANGES

The Data Access Schedule states that access can be via:

- a Community View, where an EES User has access to data for all Metering Points; or,
- a Portfolio View, where an EES User has access for a Metering Point only if it has specified responsibility for that Metering Point

Currently, EES access arrangements allow all EES Users to access Data Items from outside their portfolio, regardless of whether a Portfolio View may be acceptable to complete its business processes. As such, the draft solution explored limiting certain EES User Categories to a Portfolio View, as shown in the table above. This would ensure alignment with General Data Protection Regulations.

As the removal of data access had the potential to impact industry business processes, the Code Manager sought clarification through the Party IA of potential impacts. The Party IA requested that respondents highlight business-critical processes or activities that are dependent on accessing data outside of an EES User's portfolio. All but one of the EES User Categories - Non-Domestic Consumers – had evidence provided of legitimate business requirements for accessing the data in a Community View.

Furthermore, the Code Manager proposed to remove Data Item limitations for the Third Party Intermediary (TPI) EES User Category. TPIs are wholly dependent on the appropriate legal basis for accessing the data being in place, prior to accessing EES data. As all access is dependent on this legal basis, there is no requirement for further limitations. No evidence was provided through the Party IA opposing the proposed TPI changes, this approach has been maintained in the proposed solution.

8.2.2 DATA PRESENTATION CHANGES

The Code Manager proposed to remove all single organisation EES User Categories (such as the Alt Han Company) from the DAM, to reduce the size and complexity of the matrix. Where single organisations are specified within the Data Access Schedule, there will not be any further organisations applying for EES access under that EES User Category. As such, the Code Manager considered that these should not be included within the DAM but to ensure transparency, should be made available to interested parties upon request. Although Party IA responses didn't raise any concerns with this approach, following a legal review, the Code Manager updated the proposed solution to specify that single organisations should be included within the Data Access Schedule. This is to ensure full transparency of data access arrangements in the DAM itself. They will be presented within the DAM, under a separate tab, to enable usability for the Code Manager and the EES Provider in operational processes.

Following confirmation of the DAM contents, the Code Manager proposes that a dynamic form is added to the matrix, to allow a user to select the data access view that they want to see, rather than having to view the whole matrix. The dynamic form will present DAM information in a clear and concise format, to assist users in understanding what EES access can be applied for under each EES User Category. This has been maintained in the proposed solution.

The Code Manager proposes including Electricity Market Reform Settlement Limited (EMRS), as an EES User Category. EMRS is currently an EES User, which is not suitably defined within existing EES User Categories. This has also been maintained in the proposed solution.

One further alteration has been made to the proposed solution that was not included in the draft solution. The Code Manager proposes that the EES User Categories for 'Local Authorities' and 'HMRC, UK Police Forces and other Law Enforcement Agencies' should be represented as a Portfolio View within the DAM, based on portfolio by postcode. For the avoidance of doubt, this is not a change to their data access. Currently, both EES User Categories have category conditions, which restrict data access to specific postcodes. Shifting from category conditions to a Portfolio View to maintain the postcode restriction is to simplify and improve usability of the DAM.

8.2.3 LEGAL DRAFTING

The DAM changes are supported by amendments to the legal text in the Data Access Matrix Schedule.

The draft solution proposed an additional paragraph to be introduced in Section 4, to support the limitation of EES User Categories presented in the DAM to those which have the potential for multiple company groups:

> 4.4 For each EES User Category[4], the Data Access Matrix must specify:
>
> (a) the Data Item(s) (if any) for which an EES User[5] has access for all Metering

[4] The Data Access Schedule V3.0 will replace 'EES User Category', with 'Enquiry Service User Category'
[5] The Data Access Schedule V3.0 will replace 'EES User', with 'Enquiry Service User'

Point[6]s (known as 'Community View'); and

(b) the Data Item(s) that each EES User can access for a Metering Point only if it has a specified responsibility for that Metering Point (known as 'Portfolio View').

4.5 Where an EES User Category relates to a single organisation (such as Alt HAN Company), access is granted based on role requirements and may not be reflected within the Data Access Matrix.

4.6 The Data Access Matrix may include other conditions, where applicable.

4.7 The Code Manager shall publish the Data Access Matrix, and any changes to it, on the REC Portal.

This change has been removed from the proposed solution as the single organisation EES User Categories are now being included in the DAM.

The draft solution proposed the introduction of Electricity Market Reform Settlement Limited (EMRS) to the Data Access Schedule as a standalone EES User Category:

4.3 The EES User Categories, which shall be maintained in the Data Access Matrix, are as follows:

……..

(n) Electricity Market Reform Settlement Limited (EMRS);

And,

5.3 The authorised purpose for each category of EES User is as follows

……..

(n) Electricity Market Reform Settlement Limited (EMRS) – for the purpose of fulfilling its role in the Capacity Market and Contracts for Difference scheme;

Both these changes to the legal text have been maintained in the proposed solution.

8.3 FINAL PROPOSED SOLUTION

The proposed solution was presented to the REC Technical Expert Panel (RECTEP) on 29 June 2022 for their consideration, as requested by the REC Change Panel. The solution was endorsed by RECTEP in that meeting and has been included in this report without any additional changes.

[6] The Data Access Schedule V3.0 will replace 'Metering Point', with 'Registrable Measurement Point (RMP)'

8.4 DATA PROTECTION

The DAM is a key element of EES data governance. The Code Manager has therefore considered data protection responsibilities associated with the proposed solution. The DAM reflects the Access Agreements already in place and the Code Manager is satisfied that the pre-existing data protection assessments cover the changes made under this proposal.

8.5 EES SOLUTION

The EES Provider PIA was completed on 31 May 2022. It included two technical solution options:

- Solution Option 1 – Utilises the current EES structure, by applying Data Item limitations to REC Parties at a company level. Each company group in EES will have a singular EES User Category applied to it.
- Solution Option 2 – Requires a restructuring of EES, removing company group level access controls and applying EES User Categories on a user-by-user basis. The true application of access controls at a EES User Category basis mitigates the risk of inappropriate access being applied to certain users through errors. Furthermore, it removes the issue of users having multiple EES User Categories applied to a singular company group.

Following receipt of the PIA from the EES Provider the Code Manager concluded of the proposed solution options:

- Solution Option 2 provides greater flexibility than Solution Option 1 in applying future EES User Category changes.
- Solution Option 2 removes current and future risk of variation within the EES User Category.
- Solution Option 2 increases the speed of onboarding new EES User applications.
- Solution Option 1 did not sufficiently address the Change Proposal problem statement.
- The difference in estimated costs between solution options was not sufficient to consider Solution Option 1 viable.

Bearing in mind the above considerations, the Code Manager determined that Solution Option 2 would be progressed to DIA.

The Code Manager has undertaken a full review of the EES Service Provider DIA response and can confirm that it covers all requirements, migration support and technical changes requested. The EES solution will create a structure where a template/profile is created for all EES User Categories that can then be applied to EES Users (individuals). This will specify the access available for users as defined within the Data Access Matrix. A template/profile will not distinguish between the mode of access (GUI/API) to be used.

8.5.1 MIGRATION ACTIVITES

There are two mapping activities required to facilitate the migration of EES Users from their current categories to the updated EES User Categories, as outlined in the Data Access Schedule.

EES User Category Mapping

The Code Manager has undertaken a mapping exercise, correlating current EES system categories to EES User Categories. The outputs of this exercise will be provided to the EES Provider, so that it can complete its own mapping and validate how users must be migrated.

The DAM has split the EES User Categories into those which multiple organisations fit into and those which represent single organisations. The EES Provider will highlight any EES Users that will have a change in access rights, so that the Code Manager may engage with impacted parties to plan readiness activities. Any changes to access rights are expected to be minimal and/or provide greater access and be communicated ahead of implementation.

The single organisation EES User Categories should not have any changes in access rights.

GUI Data Items to API Data Items Mapping

The Code Manager will map the GUI data items to the API data items, to ensure that the EES Provider can accurately produce the EES User Category templates/profiles. The EES Provider will review and assess the outputs from the Code Manager mapping exercise to ensure accuracy and that the appropriate user access templates can be built, providing one unique template per EES User Category.

8.5.2 TECHNICAL EXPERT PANEL ENDORSEMENT

Details of the EES solution impact assessment were presented to the RECTEP in the meeting of 27 July 2022. This was followed by a full technical recommendation paper being provided to the members by the Code Manager on 02 August 2022. One member provided a full endorsement of the solution. No further comments nor concerns have been raised. Therefore, the full solution, without change, has been taken forward for consideration in this report.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0022 can be found here.

Changes to the legal text proposed in R0022 are made to support the proposed new Data Access Matrix.

10 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	04 November 2022

PROPOSED IMPLEMENTATION APPROACH	PHASED APPROACH

The Code Manager believes it is appropriate to have a phased implementation for this Change Proposal, which will see the DAM published in EMAR on the date of implementation. This will be followed by a period of technical development by the EES Provider to apply the alignment of EES User access within the EES system. Thereafter, 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 completion of operational processes regarding EES access.

All EES System Changes are expected to be completed outside the normal release window, as they are back-end system changes only, that have no reliance on standard release windows. The project and dates will be planned and confirmed between the Code Manager and EES Provider following approval of the change. EES Users will receive communications once this planning activity is underway.

All REC document changes are proposed to be implemented on the 04 November 2022 release.

11 CHANGE PATH

CHANGE PATH	SELF-GOVERNANCE

12 RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	REC CHANGE PANEL

13 BUSINESS CASE ASSESSMENT

13.1 COSTS

	DELIVERY COSTS	ONGOING OPERATIONAL COSTS
EES PROVIDER	£70.5k	£nil

EES Provider costs detailed here are to deliver the technical system changes as set out in section 8.5 of this report.

No costs have been identified by the Code Manager to implement this change nor any ongoing operational costs.

No costs have been identified by EES Users regarding the changes being made. The standardisation of access within EES User Categories has been designed to minimise impacts

to EES Users. It is not the intention of this Change Proposal to significantly impact business processes and the potential costs called out in the Party IA were only associated with the draft DAM that applied a Portfolio View to certain EES User Categories. Portfolio Views have not been progressed for these EES User Categories due to the value of the business processes which are dependent on access to the EES Data.

13.2 BENEFITS

No quantifiable benefits have been identified.

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
EES DATA GOVERNANCE	Implementation of R0022 will ensure that the DAM reflects the data governance approach as set out in the Data Access Schedule
EES ACCESS CONTROL	An update to the EES system, as proposed under Solution Option 2, will remove current and future risk of variation within an EES User Category and will remove the possibility that EES Users within the same category may have access to different data. This solution will also increase the speed in which new EES Users can be onboarded

13.3 COST BENEFIT ANALYIS SUMMARY

Neither the DAM, nor the EES system, currently reflect the data governance set out in the Data Access Schedule. There are no costs associated with the delivery and implementation of the DAM itself. Costs are specific to the EES system functionality to apply the standardised access within the system.

Without the system changes, data access will be managed on a manual case-by-case basis and will not optimise the technical solution, which will provide robust data governance. Additionally, if the system architecture is not updated to reflect the data access arrangements, there will remain a latent risk that EES Users will not have the same access within an EES User Category. This could result in a competitive advantage for certain users.

It is in the best interests of Consumers that the REC and the EES Provider ensure their data is protected by robust system-based functionality. The Code Manager considers the costs appropriate to deliver the necessary data governance and access controls as set out in the REC.

14 CASE FOR CHANGE

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

- the proposed solution is fully formed and appropriately resolves the problem statement;
- the proposed solution will provide the data governance and access control that is required by the Data Access Schedule;

- the proposed solution will provide a clear reference for configurations available for API access
- the cost and effort of implementing and operating the proposed solution is proportionate and cost-reflective; and
- a positive business case can be made, as set out in section 13 of this report.

The Code Manager has not made any changes to the case for change following completion and consideration of the DIA.

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 REC Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 04 November 2022.

16 CONSULTATION PLAN AND NEXT STEPS

To support the proposed implementation approach, the Change Proposal Plan sets out a two-phase consultation, so that a significant delay to publication of the DAM can be avoided. A DIA was only required for the EES System solution to apply the permissions captured in the DAM and not the DAM itself. The Code Manager therefore planned for the Change Proposal to progress to a standard 15 Working Day consultation, whilst the DIA progressed.

The first consultation on the Preliminary Change Report covering the DAM, the legal text changes and the high-level solution for the EES system changes was published on the REC Portal on **22 July 2022,** with consultation closing on **12 August 2022.**

Following the completion of the DIA, the Preliminary Change Report has been updated to version 2.0 and will be presented to the Change Panel on **16 August 2022.** Version 2.0 of this report includes a more detailed cost-benefit analysis and confirms the case for change and Code Manager recommendation.

A second 9 Working Day consultation on version 2.0 of the Preliminary Change Report will be published on the REC Portal on **18 August 2022** with consultation closing on **02 September 2022.**

Wider Non-Party REC Service Users will be notified of both consultations.

Following the conclusion of both consultations, the Code Manager will produce an updated version of this Preliminary Change Report (referred to as the Final Change Report). This will include the outcome of both consultations, setting out a summary of the consultation submissions and the Code Manager's response.

The Final Change Report will be published on **23 September 2022** to enable the Change Panel to make its determination.

17 APPENDIX

CHANGE PROPOSAL	LINK
LEGAL DRAFTING	R0022 - Draft Legal Text
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	R0022 - Consolidated IA Responses
RELATED CHANGE(S)	R0054 – EES Access for Virtual Lead Parties
ANY OTHER DOCUMENTS / LINKS	R0022 - Draft Data Access Matrix Electricity