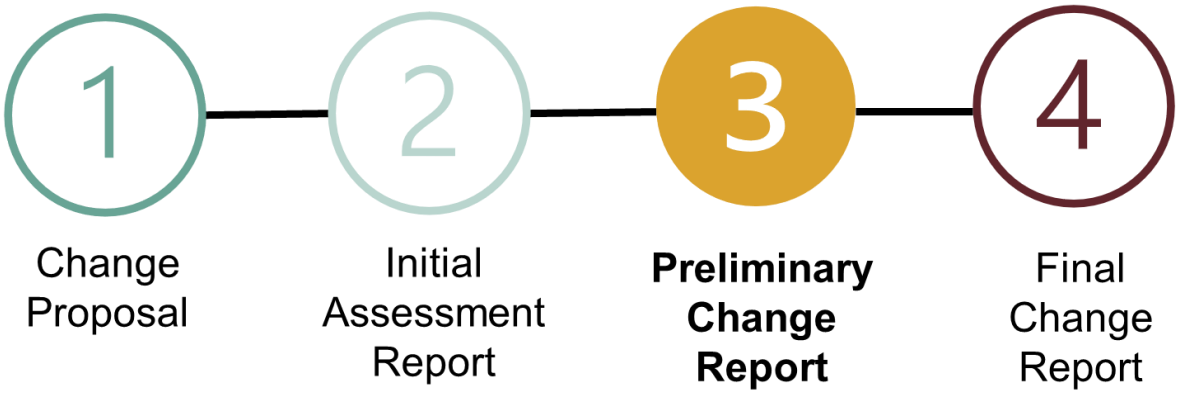
RETAIL ENERGY CODE

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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.

PRELIMINARY CHANGE REPORT

R0028 - REVIEW OF CATEGORY 3 DOCUMENTS IN THE REC BASELINE STATEMENT

DOCUMENT VERSION	1.0
DATE ISSUED	04/02/2022
DOCUMENT APPROVAL STATUS	APPROVED BY RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	CHANGE PANEL

LEAD ANALYST	Gemma Dixon	EMAIL

CHANGE OVERVIEW

This proposal seeks to formally designate identified Category 3 documents as Category 2 documents in the REC Baseline Statement, so these are subject to formal change control set out in the REC Change Management Schedule.

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0028 is **APPROVED** for implementation in an extraordinary release on 29 April 2022.

	High Impact: None
	Medium Impact: Code Manager
	Low Impact: All REC Parties and Market Participants

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BACKGROUND

1 SUMMARY

Category 3 documents, as outlined in the REC Baseline Statement, are non-mandatory guidance or subsidiary operational documents. This documentation is developed and maintained by the Responsible Provider for that document, being either the Code Manager, a REC Committee, or a REC Service Provider.

Changes to Category 3 documents do not require progression through the full formal change process and are progressed as Category 3 Change Proposals by the Responsible Provider. These changes should not have any material impacts on REC parties or stakeholders.

A review of the REC Baseline Statement has identified seven Category 3 documents where changes could result in material impacts to REC Parties and REC Service Users. As changes to these documents would require a greater degree of assessment and engagement with REC Parties and REC Service Users, it is not appropriate that the engagement, solution development and implementation timescales are solely decided at the discretion of the Responsible Provider for that document. Therefore, we consider that these documents should be re-categorised as Category 2 documents and subject to REC change control. These are:

- Performance and Assurance Report Catalogue (PARC);
- Electricity Enquiry Service (EES) Physical Message Standard (API Technical Specification); and
- the following Market Domain Data (MDD) documents:
    - MDD General
    - Meter Product Table
    - Meter Product Shadow Log
    - Converter Product Table; and
    - Converter Product Shadow Log.

It is also proposed that the MDD files be renamed to Meter Product Data (MPD) files, as MDD is a former Supply Point Administration Agreement (SPAA) term which has not transitioned into the REC.

In addition, we have also considered if there are existing Category 3 documents that do not need to be baselined as Category 3 documents. The purpose of the Category 3 change process is to provide transparency and oversight of changes to documents relevant to the operation of the REC, where these documents are maintained outside of formal REC governance. Where a document does not require formal oversight of its change control, we do not consider that it should be maintained as a Category 3 document.

There are currently nine User Guides provided by the Code Manager that are designated as Category 3 documents. We consider these are important documents for REC Service Users and these will continue to be maintained. However, changes made to these are unlikely to require the same level of engagement and oversight as with other Category 3 documents. We propose that these documents should be removed from the Baseline Statement and maintained

by the Code Manager separately to this process. We will seek views from stakeholders on this proposal when consulting on this Change Proposal.

Documents in the REC Baseline Statement not having the appropriate categorisation could have material impacts on Market Participant systems and/or processes. The formal REC change process will provide the formal engagement mechanisms for industry stakeholders and required controls for changes.

This proposal seeks to formally categorise the identified Category 3 documents as Category 2 documents in the REC Baseline Statement, so these are subject to formal change control, as set out in the REC Change Management Schedule.

2 PROBLEM STATEMENT

As a rule, changes to Category 3 products should not cause a material impact to parties and stakeholders.

It has been identified that there are a number of Category 3 documents where changes to these artefacts could have a material impact to the systems and processes of REC Parties and Service Users. These changes should therefore follow a more robust and thorough assessment to ensure these impacts are identified and the most appropriate solution is considered.

3 USER STORIES

REF.	USER STORIES
MARKET PARTICIPANT USER STORIES	
M1	As a Market Participant, I need to understand any changes that may impact my business, so I can engage in the change process and plan any required changes to my systems and processes.
M2	As the REC Code Manager, I need to ensure that proposals to amend the REC and its subsidiary documents are subject to appropriate scrutiny and impact assessment, so that impacted stakeholders can appropriately engage with the proposal and understand the impacts to their business.

PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

The Code Manager has reviewed the REC Baseline Statement and identified seven Category 3 documents where changes could result in material impacts to REC Parties and REC Service Users. As changes to these documents would require a greater degree of assessment and engagement with REC Parties and REC Service Users, it is not appropriate that the engagement, solution development and implementation timescales are solely decided at the discretion of the Responsible Provider for that document.

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5 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

5.1 RISKS AND ISSUES

No.	RISK	NOTES	MITIGATION
R1	Changes are made to the PARC prior to its categorisation to a Category 2.		The Code Manager and PAB are aware of the feedback and concerns raised by industry and will engage appropriately should any changes be required prior to the implementation of R0028.

5.2 ASSUMPTIONS AND DEPENDENCIES

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A1	There are no adverse impacts from the categorisation of identified Category 3 documents as Category 2 documents.		This will be validated in the consultation on this Preliminary Change Report.

6 PROPOSED SOLUTION

We consider that these documents should be categorised as Category 2 documents and subject to REC change control:

REC DOCUMENTS / PRODUCTS			
DOCUMENT TYPE	**DOCUMENT TITLE**	**CURRENT**	**PROPOSED**
Performance Assurance	Performance Assurance: Report Catalogue	3	2
Technical Specification	EES Physical Message Standard	3	2
Market Domain Data	MDD General	3	2
Market Domain Data	Meter Product Table	3	2
Market Domain Data	Meter Product Shadow Log	3	2
Market Domain Data	Converter Product Table	3	2

Market Domain Data	Converter Product Shadow Log	3	2

As a result of re-categorising five MDD documents, there will also be an update required to the Change Management Schedule to reference the difference in process for MDD changes/updates. It is also proposed that the MDD files be renamed to Meter Product Data (MPD) files.

In addition, there are a number of Category 3 documents that are to be removed from the Baseline Statement that are guidance and useful information only.

There is also a proposed renaming of a Category 3 document and a number of consequential changes. The breakdown of proposed amendments is detailed in the tables below.

Rename

DOCUMENT TYPE	DOCUMENT TITLE	PROPOSED DOCUMENT TYPE	PROPOSED DOCUMENT TITLE
Performance Assurance	Performance Assurance: Methodology, Risk Register, PATs, Operating Plan	Performance Assurance	Performance Assurance: Methodology
Market Domain Data	MDD General	Meter Product Data	MPD General
Market Domain Data	Meter Product Table	Meter Product Data	MPD Meter Product Table
Market Domain Data	Meter Product Shadow Log	Meter Product Data	MPD Meter Product Shadow Log
Market Domain Data	Converter Product Table	Meter Product Data	MPD Converter Product Table
Market Domain Data	Converter Product Shadow Log	Meter Product Data	MPD Converter Product Shadow Log

Removals

DOCUMENT TYPE	DOCUMENT TITLE
Performance Assurance	Performance Assurance User Guide
Entry, Qualification and Maintenance	Entry and Exit User Guide
Metering	Metering Accreditation User Guide
Theft	Theft User Guide

Service Management	Sandbox and Derogation User Guide
EMAR	EMAR User Guide
Change Management	Change Management User Guide
Change Management	Change Management Templates
Change Management	REC Portal User Guide

Consequential

DOCUMENT TYPE	DOCUMENT TITLE	CURRENT	PROPOSED
Schedule 1	Interpretations and Definitions	EES API Technical Specification: means the Category 3 document of that name, forming part of the Technical Specification that describes the Electricity Enquiry Service.	EES API Technical Specification: means the Category 2 document of that name, forming part of the Technical Specification that describes the Electricity Enquiry Service.
Schedule 1	Interpretations and Definitions		Add Meter Product Definitions
Schedule 5	Change Management		Add Market Domain Data change process.

The REC V3 version of the Change Management Schedule has been produced based on the current REC baseline, as held in EMAR. If this Change Proposal is approved, this will add an additional clause to the Change Management Schedule and update references to paragraphs. Following approval, the Code Manager will ensure updates are made to future streams in EMAR and update the baseline which REC V3 is updating. This will be reflected within the REC V3 version of the Change Management Schedule, which will be published as part of the Release Plan for this Change Proposal.

7 DRAFT LEGAL TEXT

The draft legal text to deliver the proposed solution to R0028 can be found on the Change Proposal page in the REC Portal.

8 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	29 April 2022

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

We propose this change is implemented in an extraordinary release on 29 April 2022. It is acknowledged that progressing early will reduce the risk of further material changes being made to these documents without appropriate engagement and assessment.

9 CHANGE PATH

CHANGE PATH	SELF-GOVERNANCE

10 RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	CHANGE PANEL

11 BUSINESS CASE ASSESSMENT

There are no additional costs or impacts identified from this Change Proposal. Market Participants and Service Users need to understand any changes that may impact their business, so they can engage in the change process and plan any required changes to their systems and processes. Changes to the documents identified in this Change Proposal could have impacts on these stakeholders. These documents existing outside of the formal REC change process presents a risk to the ability of Market Participants to appropriately engage with the proposal, understand the impacts to their business and therefore comply with their obligations. We are therefore satisfied that a positive business case exists for updating this and implementing this Change Proposal.

12 CASE FOR CHANGE

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

- The proposed solution is fully formed and appropriately resolves the problem statement.
- There are no identified additional costs to the market in implementing the proposed solution.

- The impact of not implementing this solution would cause detriment to Market Participants, as it would be possible for material changes to be made without being subject to the full assessment and scrutiny of the REC change process.
- A positive business case can be made, as detailed in section 11 of this report.

13 CODE MANAGER'S RECOMMENDATION

Based on the evidence in sections 11 and 12 of this report, the Code Manager considers a positive business case can be made for implementing this solution and recommends that the Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 29 April 2022.

14 CONSULTATION PLAN AND NEXT STEPS

The consultation on this Preliminary Change Report for R0028 will be published on the REC Portal on **18 February 2022** and close on **14 March 2022.**

Following consultation, 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 the consultation, setting out a summary of the consultation submissions and the Code Manager's response.

The Final Change Report will be issued to the Change Panel to make its determination.

15 APPENDIX

CHANGE PROPOSAL	Change Proposal
LEGAL DRAFTING	EMAR Change Sets