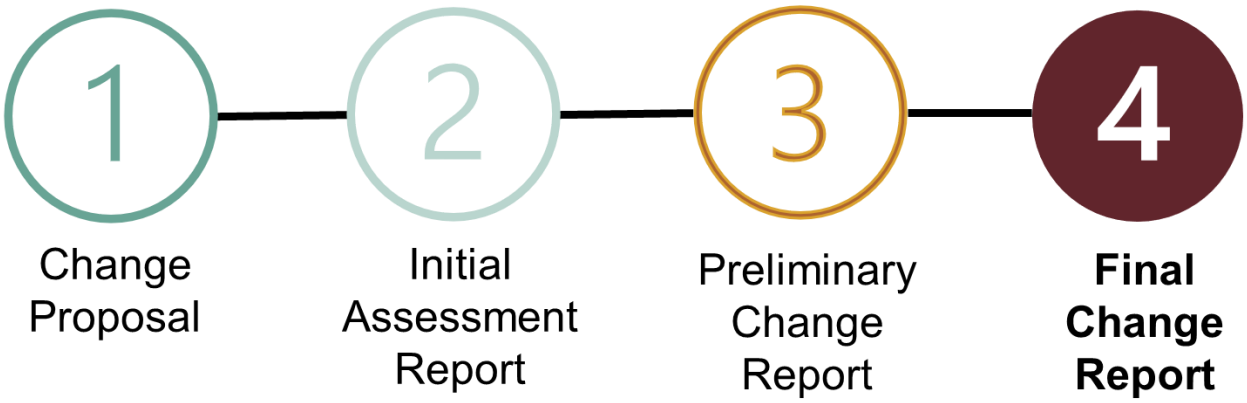
RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

FINAL CHANGE REPORT



PURPOSE:	The Final Change Report is the final stage of the Change Proposal, following consultation of the Preliminary Change Report. The Code Manager will set out their final assessment and recommendation, clarifying any changes made from the Preliminary Change Report.
NOTES:	There are three versions of the Final Change Report: one is issued the Responsible Committee for decision; one is published after the vote; and (if Authority Approval is required) one is published after the Authority determination.
NEXT STEPS:	The Final Change Report will be issued to the Responsible Committee who will vote to either approve or reject the Change Proposal, considering the recommendation of the Code Manager.

RETAIL ENERGY CODE

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

FINAL CHANGE REPORT

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

DOCUMENT VERSION	1.0
DATE ISSUED	25/03/2022
DOCUMENT APPROVAL STATUS	POST-VOTE

RESPONSIBLE COMMITTEE	CHANGE PANEL

LEAD ANALYST	Gemma Dixon	EMAIL
TECHNICAL LEAD	Rosalind Timperley	EMAIL

CHANGE OVERVIEW

	High Impact: N/A
	Medium Impact: Code Manager
	Low Impact: All REC Parties and Market Participants

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 14 April 2022.

RETAIL ENERGY CODE

CONTENTS

BACKGROUND		
1.	SUMMARY	4
2.	PROBLEM STATEMENT	5
3.	USER STORIES	5
PROPOSAL		
4.	SUMMARY OF ANALYSIS UNDERTAKEN	5
5.	KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES	6
6.	PROPOSED SOLUTION	6
7.	DRAFT LEGAL TEXT	8
8.	PROPOSED IMPLEMENTATION DATE AND APPROACH	9
9.	CHANGE PATH	9
10.	RESPONSIBLE COMMITTEE	9
11.	SUMMARY OF CONSULTATION RESPONSES	9
12.	SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION	10
13.	BUSINESS CASE ASSESSMENT	10
14.	CASE FOR CHANGE	11
15.	CODE MANAGER'S RECOMMENDATION	11
16.	APPENDIX 1	11
17	APPENDIX 2	12

RETAIL ENERGY CODE

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.

Of the suite of User Guides provided by the Code Manager there are currently 9 that are designated as Category 3. 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. These are:

- Performance Assurance User Guide
- Entry and Exit User Guide
- Metering Accreditation User Guide
- Theft User Guide
- Sandbox and Derogation User Guide
- EMAR User Guide
- Change Management User Guide
- Change Management Templates
- REC Portal User Guide

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.

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. Any 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

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.
R2	The new implementation date of 14 April 2022 is prior to the Appeal Window closure.		

5.2 ASSUMPTIONS AND DEPENDENCIES

No assumptions or dependencies have been identified that may impact the progression or implementation of this Change Proposal.

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, which are user guides 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 V3.0 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 V3.0 is updating. This will be reflected within the REC V3.0 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 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	14/04/2022

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

We originally proposed an implementation date of 29 April 2022, as it was acknowledged that progressing early will reduce the risk of further material changes being made to these documents without appropriate engagement and assessment. However Authority Change Proposal R0034 – Market Stabilisation Charge, has a proposed implementation date of 14 April 2022, therefore we now proposed to align the implementation of this Change Proposal with R0034, in order to limit the impact on Parties from having multiple releases in a short space of time.

9 CHANGE PATH

CHANGE PATH	SELF-GOVERNANCE

10 RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	CHANGE PANEL

11 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 18 February 2022 to obtain views on the Preliminary Change report. In total eight responses were received from six Suppliers (one confidential) one Distribution Network and one from the DCC.

Although the confidential response hasn't been included in this report, it will be shared with the Responsible Committee to support the review.

The key themes from the non-confidential responses have been summarised and set out below.

11.1 SUMMARY OF RESPONSES

11.1.1 COMMENTS ON THE SOLUTION

All respondents agreed with the proposed solution.

11.1.2 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

All respondents agreed with the Code Manager's recommendation that this change should be approved for implementation.

11.1.3 IMPLEMENTATION APPROACH AND DATE

All respondents agreed with the proposed implementation date and technique, with one party specifically suggesting alignment with the implementation of R0034.

11.1.4 OTHER COMMENTS

Some respondents highlighted concerns of potential changes being made to the documents listed in this report ahead of this change being implemented, which would allow updates to be made without an Impact Assessment or Consultation.

One respondent highlighted a concern around the proposed implementation date of 29th April 2022 and that this wouldn't allow key stakeholders enough time for CSS reporting to be raised as a Category 2 change.

12 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

DOCUMENT	SECTION	AMENDMENT	REASON
Final Change Report	8 (Proposed Implementation Date)	Implementation Date updated from 29 April 2022 to 14 April 2022.	This aligns R0028 implementation with R0034 which will prevent two separate Releases in April. An earlier date is supported in consultation responses.

Final Change Report	5.2 (Assumptions and Dependencies)	Assumption (A1) that there are no adverse impacts from the categorisation of identified Category 3 documents as Category 2 documents.	All respondents agreed with the proposed solution and did not challenge this assumption.
Final Change Report	5.1 (Risks and Issues)	Additional Risk (R2) added to document.	Change in Implementation date means the Appeal window would still be open when this change is implemented.

13 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.

14 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 13 of this report.

15 CODE MANAGER'S RECOMMENDATION

Based on the assessment 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 Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 14 April 2022.

16 APPENDIX 1

CHANGE PROPOSAL	Change Proposal
LEGAL DRAFTING	EMAR Change Sets

17 APPENDIX 2

QUESTION	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
Do you agree with the proposed solution? If not, please explain why?	**EDF** Energy Supplier	We agree that the documents detailed in the Preliminary Change Report, and especially the Performance and Assurance Report Catalogue (PARC), should be reclassified in the manner set out in the report. Where changes to a REC document are likely to have a material impact on REC Parties then they should be subject to the full REC Change Process, including consultations with, and impact assessment by, impacted REC Parties.	The response supports the Code Managers solution and recommendation.
	Drax Group Energy Supplier	Yes. In particular, we support the proposal to reclassify the PARC as a Category 2 document. Category 3 documents are defined as guidance or subsidiary documents. The REC states that changes to Category 3 documents should have no material impact on REC parties or stakeholders, which is not the case with the enduring reports which form part of the PARC. For example, changes were made to the new Performance Assurance reports prior to their first submission in January 2022, resulting in us having to make modifications to the reports we were building. It is appropriate that the PARC is reclassified as a Category 2 document for the following reasons; 1. As a Category 3 document, the Code Manager can currently make	The response supports the Code Managers solution and recommendation.

		changes to the data requirements within the PARC reports at very short notice. These changes incur costs and require IT changes and testing, which REC parties don't have the capacity to accommodate at short notice. Category 2 changes, progressed through a full, formal consultation process, allow parties the opportunity to assess costs and benefits associated with any changes and enable more realistic timescales for implementation. 2. Because Category 3 documents are defined as guidance or subsidiary documents, there's a risk that any changes to them may be overlooked by REC parties. In the case of the PARC reports, this could result in different parties submitting differing data sets.	
	Scottish Power Energy Supplier	Yes	
	DCC DCC	DCC are supportive of the proposed solution.	
	Utilita Energy Limited Energy Supplier	Yes	
	Corona Energy Energy Supplier	Yes	
	Electricity North West Limited DNO	Yes – the proposal to move the proposed documents to Category 2 documents will ensure that the appropriate level of scrutiny, assessment and consultation occurs on documents which have a direct impact on parties.	The response supports the Code Managers solution and recommendation.
Do you agree with the proposal to remove User Guides from the?	**EDF** Energy Supplier	We agree with this proposal, however it is important that REC Parties are informed of any changes that are made to the User Guides so that they are	The process for management of User Guides will be developed as part of the Release Plan

If not, please explain why.		operating to up to date guidance. If the User Guides are removed from the Baseline Statement, there will need to be a process in place to communicate any changes to REC Parties on a timely basis.	and published as a Knowledge Article.
	Drax Group Energy Supplier	We do not have a view on this part of the proposal.	
	Scottish Power Energy Supplier	Yes, however the documents still need to be available with a recognised communication strategy/method for any changes.	The process for management of User Guides will be developed as part of the Release Plan and published as a Knowledge Article.
	DCC DCC	DCC agree with the proposal to remove the User Guides from the Baseline Statement.	
	Utilita Energy Limited Energy Supplier	Yes	
	Corona Energy Energy Supplier	Yes	
	Electricity North West Limited DNO	Yes – there are no impacts of this change to parties.	
Do you agree with the proposed implementation date and implementation technique? If not, please explain why?	**EDF** Energy Supplier	Yes, we agree with the proposed implementation date and the implementation technique. However, this is only on the basis that no changes to the documents listed in the Report, and especially the PARC, will be progressed without full consultation and impact assessment ahead of the proposed implementation date at the end of April.	No changes will be made to the PARC or EES Technical Specification ahead of this Change Proposal being implemented.
	Drax Group Energy Supplier	Yes. We would like to see this change implemented at the earliest opportunity.	

	Scottish Power Energy Supplier	Would it not make sense to align R0034 release? This would mean there would only be one extraordinary release making it easier for everyone to manage.	The Code Manager agrees this is the appropriate implementation approach. This is reflected in the Final Change Report.
	DCC DCC	DCC agree with the proposed implementation date and implementation techniques.	
	Utilita Energy Limited Energy Supplier	Yes. I am aware there may be changes to the current PARC to allow for CSS Performance Assurance after go-live. I am concerned the implementation date of 29th April 2022 won't allow key stakeholders enough time for CSS reporting to be raised as a Category 2 change?	Any future changes to the PARC will follow the standard Change Proposal process. This will allow sufficient time for assessment and consultation ahead of implementation at an appropriate time. This would be determined as part of the Change Proposal process.
	Corona Energy Energy Supplier	Yes	
	Electricity North West Limited DNO	Yes – the proposed date will ensure that any future changes to the documents will progress through the appropriate level of review and consultation.	
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 Change Panel?	**EDF** Energy Supplier	Yes, we agree that this is a Self-Governance changes approved by the Change Panel.	
	Drax Group Energy Supplier	Yes	
	Scottish Power Energy Supplier	Yes	
	DCC DCC	DCC agree with the Code Manager's assessment of the Change Path and for it to be subject to Self-Governance approval via the REC Change Panel.	
	Utilita Energy Limited	Yes	

	Energy Supplier		
	Corona Energy Energy Supplier	Yes	
	Electricity North West Limited DNO	Yes – this is a sensible proposal.	
Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 29 April 2022? If not, please explain why?	**EDF** Energy Supplier	Yes, we agree with the proposed implementation date of 29th April 2022. However, as previously noted, this is only on the basis that no changes to the documents listed in the Report, and especially the PARC, will be progressed without full consultation and impact assessment ahead of the proposed implementation date.	As above
	Drax Group Energy Supplier	Please see response to Q3.	
	Scottish Power Energy Supplier	See response to Q3.	
	DCC DCC	DCC agree with the Code Managers recommendation for implementation on 29 April 2022.	
	Utilita Energy Limited Energy Supplier	Yes, the sooner the better!	
	Corona Energy Energy Supplier	Yes	
	Electricity North West Limited DNO	Yes	
Do you have any other comments relating to this Change Proposal?	**EDF** Energy Supplier	No	
	Drax Group Energy Supplier	No	

	Scottish Power Energy Supplier	No	
	DCC DCC	No	
	Utilita Energy Limited Energy Supplier	No further comments.	
	Corona Energy Energy Supplier		
	Electricity North West Limited DNO	No	