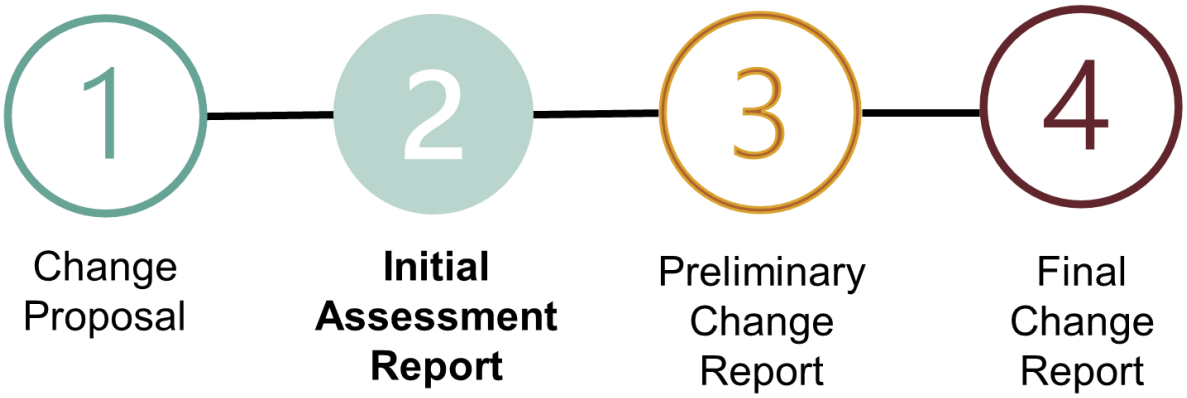
RETAIL ENERGY CODE

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

# INITIAL ASSESSMENT REPORT




| | |
|---|---|
| **PURPOSE:** | This is a written report from the Code Manager setting out their initial assessment of the Change Proposal and planned next steps for progressing the proposal. |
| **NOTES:** | The Initial Assessment Report is accompanied by a Change Proposal Plan, which describes the Code Manager's plan for progressing this Change Proposal.<br><br>The solution will not be finalised until the publication of the Preliminary Change Report. |
| **NEXT STEPS:** | The Change Proposal Plan will set out the next steps for progressing this Change Proposal.<br><br>The Code Manager will either propose additional activities to develop and/or assess the solution, or immediately prepare and publish the Preliminary Change Report. |

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

# INITIAL ASSESSMENT REPORT

## R0045 - CHANGES TO SDEP MESSAGES AND SCHEDULE NUMBERING FOR REC V3.0

| | |
|---|---|
| **DOCUMENT VERSION** | 2.0 |
| **DATE ISSUED** | 13/05/2022 |
| **DOCUMENT APPROVAL STATUS** | APPROVED BY REC CHANGE PANEL |
| **RESPONSIBLE COMMITTEE** | TECHNICAL EXPERT PANEL |

## CHANGE OVERVIEW

This change will update the Secure Data Exchange Portal messages in the REC Data Specification so that all messages are represented accurately in the Energy Market Architecture Repository (EMAR) from CSS Go-Live Date and REC V3.0.

| | |
|---|---|
|  | High Impact:<br>N/A |
|  | Medium Impact:<br>N/A |
|  | Low Impact:<br>Energy Suppliers and Distribution Network Operators |

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| LEAD ANALYST |
|---|
| Ann Perry |
| EMAIL |

| TECHNICAL LEAD |
|---|
| Beth Brown |
| EMAIL |

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## 1 SUMMARY

REC V3.0 will be implemented on 18 July 2022 and will introduce a new Resolution of Consumer Facing Switching and Billing Issues (CFSB) Schedule. This schedule will replace the existing processes in the MRA Transition Schedule and SPAA Transition Schedule to resolve switching and billing exceptions between Energy Suppliers.

The CFSB Schedule introduces a standardised and shortened escalation process between Energy Suppliers that will apply to all processes set out in the schedule. New resolution and escalation processes are being established which will change the way that Energy Suppliers need to interact with each other, and the individual points of contact used in the current processes.

The majority of interactions between Energy Suppliers and, in some cases, Distribution Network Operators (DNOs), are managed through the Secure Data Exchange Portal (SDEP). Users can send unstructured messages to each other to investigate and resolve issues through a secure system rather than use email.

The changes being introduced with REC V3.0 will impact existing SDEP messages which will need to be updated. These changes have been agreed with the SDEP Service Provider and are due to be deployed at CSS Go-Live Date with REC V3.0. As the SDEP messages are set out in the Data Specification, a Change Proposal is required to these messages in the Energy Market Architecture Repository (EMAR).

The Code Manager acknowledges there are wider questions being raised by REC Parties about the escalation process changes being introduced as part of the CFSB Schedule changes, these are being addressed as part of the REC v3.0 Release communication and engagement activity. This Change Proposal is specifically to ensure the Data Specification in EMAR accurately reflects the SDEP messages that will be live at REC V3.0.

The existing SDEP messages in the EMAR are also not populated correctly, and do not accurately reflect the Data Items relevant to each message or the conditionality of these. This change will also update these so that all SDEP messages will be represented accurately in the EMAR from REC V3.0.

Additional Housekeeping Changes for REC V3.0 Schedule Numbering

In addition, the Code Manager has another set of housekeeping corrections to address the numbering of the new Schedules being introduced at REC V3.0. The proposer has confirmed they are comfortable that these can also be updated as part of this Change Proposal as a more efficient route than a separate housekeeping Change Proposal. The housekeeping change will update the numbers for the new Schedules being introduced at REC V3.0, so that they align to the REC V3.0 Baseline Statement.

## 2 PROBLEM STATEMENT

The Secure Data Exchange Portal (SDEP) will be updated at CSS Go-Live Date to reflect the new processes being introduced as part of REC V3.0. The SDEP messages and Data Items in the Energy Market Architecture Repository (EMAR) do not currently reflect these new

processes. SDEP users require the Data Specification to accurately reflect the messages and Data Items to enable them to meet their obligations.

## 3 USER STORIES

| REF. | USER STORIES |
|---|---|
| **CONSUMER USER STORIES** | |
| C1 | As a Consumer, I want my Energy Supplier to resolve any Switching or billing issues in a timely manner without unnecessary delays, so that I can receive accurate and timely bills from my chosen Energy Supplier. |
| **MARKET PARTICIPANT USER STORIES** | |
| M1 | As an SDEP User, I want to understand any changes to SDEP messages I need to send and receive that may impact my business, so I can engage in the process and plan any required changes to my processes. |

## 4 IMPACTS

| REC PARTIES AND SERVICE USERS |
|---|
| Energy Suppliers |
| Distribution Network Operators |

| REC DOCUMENTS / PRODUCTS |
|---|
| Data Specification – SDEP messages |
| Interpretations and Definitions Schedule |
| Registration Services |
| Switching Data Management |
| Central Switching Service |
| Switching Service Management |
| RMP Lifecycle |
| Related Metering Points |
| Address Management |
| Resolution of Consumer Facing Switching and Billing Issues |

| CONSUMERS |
|---|
| All Consumers |

The changes required are as follows:

**SDEP Housekeeping updates** – existing SDEP messages in the EMAR need to be updated to correctly reference the relevant Data Items and the associated conditionality of these Data

Items. There are also some existing SDEP messages that aren't reflected in the EMAR, which will need to be added.

**Removal of the "second escalation" from escalation messages** – the CFSB Schedule has removed the "second escalation" from the existing escalation processes, and there will now only be a first escalation to an operational contact, followed by a final escalation to the REC Contract Manager. The following messages will be amended to reflect this from the CSS Go-Live Date:

- Disputed Meter Readings (Gas.) – Escalation
- Missing and Disputed Meter Readings (Elec.) - Escalation
- Erroneous Transfers (Elec.) – Escalation
- Erroneous Transfers (Gas.) - Escalation
- Erroneous Transfer Re-registration (Elec.) – Escalation
- Erroneous Transfer Re-registration (Gas.) – Escalation
- Debt Assignment Protocol (Elec.) – Escalation
- Debt Assignment Protocol (Gas.) – Escalation
- Misdirected Payments (Elec.) – Escalation
- Misdirected Payments (Gas.) – Escalation
- Crossed Meters (Gas.) – Escalation
- Duplicate Meter Points (Gas.) – Escalation
- All existing active and archived Communications, belonging to the above Process Types at Second Escalation, at the time of the change will be downgraded to First Escalation.
- A record will be added to the Audit History for each affected Communication stating that the Communication Escalation was changed by the System.
- The 'Last Escalated Date' will be updated by this change, meaning, the sender of an affected Communication will have to wait the given number of days (5 Working Days) before escalating the Communication again.
- Any users, assigned to Second Escalation for the above Process Types, will be reassigned to First Escalation. If the user is already assigned to First Escalation, they will only be removed from Second Escalation.

**New messages** – four new messages will be introduced to the SDEP as part of REC V3.0. These messages will only impact Energy Suppliers, who will need to assign relevant team members to the new process types to ensure they are able to send and receive these messages. These are:

- Replacement Readings (Gas.) – Escalation
- Crossed Meters (Elec.) – Escalation
- Duplicate Meter Points (Elec.) – General Query
- Duplicate Meter Points (Elec.) – Escalation

**Removed messages** – the following messages will be removed from REC V3.0, as the processes they relate to will no longer be in operation:

- Customer Requested Objections (Elec.) – General Query
- Customer Requested Objections (Gas.) – General Query

Once these are removed, SDEP users will no longer be able to create new communications or assign users to these process types. It will still be possible to perform the following actions belonging to these process types:

- Download attachments
- Delete attachments
- Archive communication
- Export communication
- Assign/unassign owner
- Read existing comments
- View Audit History

It will not be possible to perform the following actions:

- Add a new comment
- Add a new attachment
- Update search tags
- Update Data Items

**Update process type name** – the existing process type "CSS Data Cleanse (Elec.) – General Query" will be updated to "Supplier Data Error Resolution (Elec.) General Query". This reflects the fact that this will no longer be required for CSS Data Cleansing but will still be required by Suppliers and Distributors to resolve ongoing data quality issues. Therefore, the message has been retained (as requested by the Switching Programme Data Working Group) but the name has been updated to reflect the enduring use.

Additional Housekeeping Changes for REC V3.0 Schedule numbering

**New Schedules numbering** – there are eight new Schedules being introduced as part of REC V3.0. The schedule numbers need to be updated within the schedules themselves and the Interpretations and Definitions Schedule to reflect the Schedule numbers assigned within the REC V3.0 version of the Baseline Statement

| | |
|---|---|
| Schedule 23 | Registration Services |
| Schedule 24 | Switching Data Management |
| Schedule 25 | Central Switching Service |
| Schedule 26 | Switching Service Management |
| Schedule 27 | RMP Lifecycle |
| Schedule 28 | Related Metering Points |
| Schedule 29 | Address Management |
| Schedule 30 | Resolution of Consumer Facing Switching and Billing Issues |

## 4.1 CROSS CODE IMPACTS

There are no consequential changes required to the Balancing and Settlement Code (BSC) or Distribution Connection and Use of System Agreement (DCUSA) but it should be noted that some of the housekeeping updates required relate to processes that will be governed under these codes from REC V3.0

## 5 CHANGE PATH AND RESPONSIBLE COMMITTEE

| | |
|---|---|
| **CHANGE PATH** | SELF-GOVERNANCE |
| **RESPONSIBLE COMMITTEE** | TECHNICAL EXPERT PANEL |

The SDEP messages within the Data Specification are the responsibility of the Technical Expert Panel (TEP).

Although this change is also seeking to make housekeeping changes which would ordinarily be the responsibility of the Change Panel, the Code Manager proposes the TEP is the appropriate Responsible Committee as this Change Proposal has been raised to progress the changes to the Data Specification.

## 6 PRIORITY STATUS AND URGENCY

| | |
|---|---|
| **PRIORITY STATUS** | HIGH |
| **URGENCY** | URGENT |

### PRIORITISATION MATRIX

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

| | |
|---|---|
| Weighted Significance Score | 1 |
| Urgency | 3 |
| Overall Priority Score | **13** |

| | |
|---|---|
| Effort | 0 - Minimal |

Urgency

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

Significance

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

| PRIORITY STATUS |
|---|
| High |

The Priority Status for this Change Proposal is 'High' based on a 'Weighted Significance' score of 1 and an 'Urgency' score of 3. This is broken down as below:

Significance:

Legal/Regulatory Compliance – a score of 2 to reflect that there would be material inconsistencies between the Data Specification in the EMA and the CFSB Schedule and SDEP at REC V3.0. This may impact a REC Parties ability to meet their obligations.

Strategic Direction – a score of 1 as the implementation of this Change Proposal will ensure the REC Data Specification in EMAR reflects the changes developed as part of the Switching Programme and being implemented at REC V3.0.

Consumer Impacts – a score of 1 to reflect that implementation of this Change Proposal may mitigate minor impacts Consumers may experience due to SDEP message issues delaying the resolution of queries.

Urgency:

> This Change Proposal has been given an urgency score of 3 to reflect the need for it to be progressed immediately to achieve an implementation on the CSS Go-Live Date and REC V3.0

We propose that this Change Proposal should follow an urgent timetable to be implemented in time for REC V3.0.

The changes are being deployed to the SDEP already and associated guidance is being delivered to REC Parties through updates to the SDES User Guide (Category 3 document), but the EMAR should be updated to reflect this as well.

## 7 SUMMARY OF CHANGE PROPOSAL PLAN

REC Party or Service Provider impact assessments are not required as this Change Proposal will make changes to the Data Specification to reflect process changes being introduced via the CFSB Schedule, which have already been extensively consulted on as part of the Switching Programme.

SDEP system changes have already been impact assessed, costed, and approved. Therefore, there is no need for further impact assessment with the SDEP Service Provider.

As an Urgent Change Proposal, following publication of the Preliminary Change Report, a 10 Working Day consultation period is proposed.

| | FROM | TO |
|---|---|---|
| DEADLINE FOR ALTERNATIVE CHANGE PROPOSAL SUBMISSION | 27/05/2022 | 27/05/2022 |
| PRELIMINARY CHANGE REPORT ISSUED | 27/05/2022 | 27/05/2022 |
| CONSULTATION ISSUED | 27/05/2022 | 14/06/2022 |
| FINAL CHANGE REPORT ISSUED | 22/06/2022 | 22/06/2022 |
| RESPONSIBLE COMMITTEE DECISION | 29/06/2022 | 29/06/2022 |
| APPEAL WINDOW CLOSURE | 13/07/2022 | 13/07/2022 |

RETAIL ENERGY CODE

## 8 GLOSSARY

| TERM | DEFINITION |
|---|---|
| Balancing and Settlement Code (BSC) | means the Balancing and Settlement Code, as defined in the Electricity Supply Licences. |
| CSS Go-Live Date | means the time and date designated as such by the Authority |
| Distribution Connection and Use of System Agreement (DCUSA) | means the agreement of that name maintained pursuant to the Electricity Distribution Licences. |
| Distribution Network Operator (DNO) | means a person holding an Electricity Distribution Licence. |
| Energy Market Architecture Repository (EMAR) | means the repository containing obligations, business rules and processes for this Code and data specifications for this Code and other Energy Codes. |
| Energy Market Data Specification | means the document of that name forming part of the Technical Specification. |
| Energy Supplier | means a person which is either or both an Electricity Supplier and/or a Gas Supplier. |
| Meter Equipment Manager (MEM) | means, as applicable, either: (a) for electricity, the Meter Operator Agent (as defined in the BSC) Appointed by an Electricity Supplier; or (b) for gas, the Meter Asset Manager (as defined in the UNC) Appointed by the Gas Supplier. |
| Retail Energy Code (REC) | means this Code, including its Schedules and the Technical Specification, maintained pursuant to the electricity supply licences granted under the Electricity Act 1989 and the gas supply licences granted under the Gas Act 1986, as such code is modified from time to time in accordance with its provisions. |
| Secure Data Exchange Portal (SDEP) | means the portal of that name which forms part of the Secure Data Exchange Service. |
| Working Day (WD) | means any day other than a Saturday, a Sunday, Christmas Day, Good Friday, or a day that is a bank holiday in either or both England and Wales within the meaning of the Banking and Financial Dealings Act 1971. |