RETAIL ENERGY CODE

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

FINAL CHANGE REPORT

R0054 – EES ACCESS FOR VIRTUAL LEAD PARTIES

CHANGE REPORT	FINAL
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DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	02/09/2022

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CHANGE OVERVIEW

This Change Proposal seeks to allow Virtual Lead Parties (VLP) access to the Electricity Enquiry Service (EES), to allow them to efficiently register their customers for balancing services under the Balancing and Settlement Code (BSC).

	High Impact: N/A
	Medium Impact: N/A
	Low Impact: Electricity Enquiry Service (EES) Provider, Virtual Lead Parties (VLPs)

RESPONSIBLE COMMITTEE DECISION

On 26 October 2022 the REC Technical Expert Panel voted to **APPROVE** R0054 for implementation on 04 November 2022.

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RETAIL ENERGY CODE

BACKGROUND

1 SUMMARY

VLPs are a Market Participant defined under the BSC. VLPs independently aggregate Supplier Volume Allocation (SVA) registered units to be entered into the balancing mechanism. VLPs are required by the BSC to provide their customer's MPAN as part of their application to provide balancing services.

As an independent aggregator with no link to an Energy Supplier, a VLP does not fit into any of the Market Roles currently defined as users of the Electricity Enquiry Service (EES) within the electricity Data Access Matrix (DAM).

There are currently only a small number of VLPs, however, by introducing the Market Role it will provide the mechanism for all VLPs to request access without the need for further Change Proposals to be raised.

2 PROBLEM STATEMENT

VLPs are required to provide their customer's MPAN as part of the registration process, as per the BSC. VLPs do not currently have access to the EES to enable an MPAN search, and they have no reliable means to acquire the MPAN, other than asking their customer to provide it. This could potentially lead to delays in the registration process and may result in an increased risk of inaccurate data, detrimentally impacting the service VLPs are able to provide to their customers.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As a Consumer, I want my VLP to have access to the data needed to correctly register me in a timely manner, so there aren't delays in the delivery of my service.
MARKET PARTICIPANT USER STORIES	
M1	As a VLP, I want to have access to all the data I need to register my customers so I can deliver the service they have requested, without delay.
M2	As a VLP, I want to be able to use the EES to find the MPAN of a customer using their address information, to enable me to reliably gather this data to without delay or further engagement with my customer.

4 PROPOSED SOLUTION

This Change Proposal seeks to update the DAM to include VLPs as a new EES User Category, which will allow them access to the Data Items required to fulfil their Market Role. The change will also require the EES to be updated to reflect the new access for VLPs.

The EES data required by the VLPs is:

- MPAN Core
- Meter Address

This solution will require the EES Provider to make the necessary amendments to the EES system to accommodate the new Market Role and provide access to the correct data items.

The solution will make amendments to the DAM, which specify the EES data items the VLPs are permitted to access. Change Proposal R0022, will introduce a new version of the DAM, this Change Proposal will make amendments to this updated version.

The below table shows what the DAM, post R0022 implementation, will look like with the column for VLP access added.

Data Access Matrix Electricity	Virtual Lead Party (VLP)
Data Items	Community
Address Line 1	Yes
Address Line 2	Yes
Address Line 3	Yes
Address Line 4	Yes
Address Line 5	Yes
Address Line 6	Yes
Address Line 7	Yes
Address Line 8	Yes
Address Line 9	Yes
MPAN Core	Yes
Postcode	Yes

This solution fully resolves the issue presented within the problem statement. Currently VLPs are unable to apply for access to EES through the standard process available to industry. Following implementation of the proposed solution VLPs will be able to gain access to EES and the data they require to fulfil their role.

There are also additions being made to the legal text in Schedule 1 – Interpretations, as set out below in section 5 of this document.

5 DRAFT LEGAL TEXT

To facilitate this Change Proposal, changes are being made to Schedule 1 – Interpretations to include a definition of Virtual Lead Party, as well as the clarification of the definition of Market Role, so it is clearer which Parties and Market Participants the term is referring to.

The legal text changes to deliver the proposed solution to R0054 can be found here.

6 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

6.1 SERVICE PROVIDER IMPACT ASSESSMENTS

An Impact Assessment was issued to the EES Provider on 22 July 2022, to assess the cost and impact of changes to EES systems.

EES PROVIDER	• Two solutions were assessed. Whilst these were fundamentally the same, one considered implementation prior to R0022, and the other considered implementation after, or alongside R0022. 1. The EES Provider has confirmed there will be no cost should the Change Proposal be implemented alongside or after R0022. 2. The costs for implementation of this change prior to the implementation of R0022 is laid out in section 12.1 of this document. ▪ If this change was implemented prior to R0022, the EES Provider would not be able to restrict the data items in EES to the level we have requested. This would mean that VLPs would also have access to the following additional data items; ▪ Cancelledindicator ▪ Currentsupplierregistrationdate ▪ Mpandesignation ▪ Relationshipstatusindicator ▪ Energisation status ▪ GSP group ▪ Trading status ▪ Distributor ▪ The access to these additional data items would automatically be removed when R0022 is implemented.

	▪ Implementation timelines were provided (Circa 7.75 FTE Days). • The EES Provider considered the assumptions provided by the Code Manager and validated these regarding VLP EES access methods (shown in A1 in section 8.2). The EES Provider also provided their own assumptions for consideration by the Code Manager.

7 DELIVERY AGAINST CHANGE PROPOSAL PLAN

To date, the activity for this Change Proposal has been completed in line with the Change Proposal Plan. The Change Proposal Plan can be found here.

8 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

8.1 RISKS AND ISSUES

NO.	RISK	NOTES	MITIGATION
R1	Implementation During Appeals Window.	The proposed implementation date of 04 November 2022 is within the appeal window, which will closed on 10 November 2022.	Due the simplicity of this change we do not anticipate any appeals against the Responsible Committee decision. Should an appeal be received, the Code Manager will work with its Service Providers to postpone the implementation of this Change Proposal until the appeal can be resolved.
R2	VLP access to additional Data Items if this Change Proposal is implemented prior to R0022.	Should R0022 not be implemented, the VLP EES User Category will have access to additional data items (detailed in section 6.1).	Whilst it was approved by Change Panel on 04 October 2022, should R0022 not be implemented as expected, the Code Manager will assess the risk of VLP access to additional Data Items and take appropriate mitigating action. This may result in VLP access to the EES being delayed until access to the Data Items is restricted, or until a full risk assessment has been completed. Alternatively, the implementation date may be revised through a new Change Proposal (as per Paragraph 25.6 of Schedule 5 - Change Management).

8.2 ASSUMPTIONS AND DEPENDENCIES

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A1	The method of access to EES Data is not determined by the Data Access Matrix (DAM)	Method of retrieval (GIU, API, Reports etc) should not impact the available data.	Confirmed through the EES Provider Impact Assessment

NO.	DEPENDENCY	NOTES	STATUS
D1	Change Proposal R0022 is seeking to make fundamental changes to the way access to EES is managed.	The R0022 solution seeks to make changes to the way new EES User Categories are added to the EES system by the EES Provider. This new approach will remove any cost associated with implementing this change. Therefore, this change should be implemented at the same time or after R0022.	Open – R0022 was approved on 04 October 2022 for implementation on 04 November 20222

9 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	04/11/2022

PROPOSED IMPLEMENTATION APPROACH	PHASED

The Code Manager is proposing a phased implementation approach, to align the implementation date and approach to R0022. This will mean that the legal text and technical system changes will be delivered separately.

On 04 November 2022 the legal text and DAM changes associated with R0022 will be implemented, it is proposed that the legal text and DAM changes for this Change Proposal are implemented alongside the changes for R0022.

The creation of the VLP User Category within the EES system will be implemented alongside the technical changes for R0022, the date of which will be determined and communicated as part of the release management activity for R0022.

This will mean that VLPs will be able to sign Access Agreements for EES access after the DAM and legal text changes have been implemented on 04 November 2022 but will not be able to access the Data Items in EES until the technical changes are delivered.

10 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 02 September 2022 to obtain views on the Preliminary Change report. In total four responses were received; from an Energy Supplier, two Distribution Network Operators and the Balancing and Settlement Code (BSC).

The key themes from these responses have been summarised and can be found here.

10.1 SUMMARY OF RESPONSES

10.1.1 COMMENTS ON THE SOLUTION AND LEGAL TEXT

All respondents agreed that the intention of the proposed legal text resolved the issue presented in the problem statement.

However, one response raised an issue that there is a distinction between Asset Metering Virtual Lead Parties (AMVLPs) and Virtual Lead Parties (VLPs). This meant that the original drafting of the Market Role definition would not recognise Virtual Lead Parties as a Market Role, due to only AMVLPs being part of Market Domain Data (MDD). Alternative legal text has been provided as part of this Final Change Report that resolves this issue.

Another respondent was supportive, but also qualified their support was based on the understanding that VLPs will be held to the same data protection requirements as other EES Users.

10.1.2 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

Respondents agreed with the recommendation to approve this change and allow VLPs the requested access to EES, however one respondent highlighted the dependency on R0022 being implemented at the same time or prior to this change, and the risk that VLPs would have access to additional data items if R0022 is not implemented.

10.1.3 IMPLEMENTATION APPROACH AND DATE

Respondents agreed with the proposed implementation date of 04 November 2022 for the legal text and DAM changes, and the implementation of the technical changes aligned with R0022.

However, one respondent raised a concern that this will be within the appeal window, requesting that within the mitigation of R1 we include further details of actions that will be taken should an appeal be raised against the Responsible Committee decision.

11 BUSINESS CASE ASSESSMENT

11.1 COST BENEFIT ANALYSIS

EES development and implementation costs are only relevant should R0022 not be implemented, or the solution for that change is altered.

COSTS	DESIGN/ DEVELOPMENT COSTS	IMPLEMENTATION COSTS	ONGOING OPERATIONAL COSTS
EES PROVIDER	£2,857	£4,919	N/A

This Change Proposal is being progressed to allow a Market Participant the access they require to EES to fulfil their Market Role effectively, although quantifiable benefits have not been identified, the following intangible benefits have been identified.

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
VLP Registration	VLPs are a recognised Market Role, and under the BSC they are required to provide the MPAN as part of their registration. This Change Proposal enables them to carry out their Market Role more efficiently.
VLPs	Virtual Lead Parties are a recognised industry party who operate under the BSC, it is appropriate for them to have access to EES and the appropriate data to fulfil their role.

12 CASE FOR CHANGE

12.1 SELF-GOVERNANCE

The Code Manager considers that there is a case for change 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 an already recognised Market Role, VLPs, the appropriate access to carry out their function.
- the proposed solution offers positive outcomes for Consumers who contract with a VLP, through an improved registration journey, made possible by the improved efficiency this change will enable.
- if this change is not implemented there is no other practical way for VLPs to access the MPAN Data Item.

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 Technical Expert Panel:

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

14 RESPONSIBLE COMMITTEE DECISION

On 26 October 2022 the REC Technical Expert Panel voted to **APPROVE** R0054 for implementation on 04 November 2022.

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16 APPENDIX

CHANGE PROPOSAL	R0054 Change Proposal Page
LEGAL DRAFTING	Link to EMAR
CONSOLIDATED CONSULTATION COMMENTS AND CODE MANAGER'S RESPONSES	Non-Confidential Responses
RELATED CHANGE	R0022 Change Proposal Page
OTHER DOCUMENTS / LINKS	Draft Changes to the Data Access Matrix Draft Legal Text (PDF)

17 GLOSSARY

TERM	DEFINITION
Balancing and Settlement Code (BSC)	Means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
Data Access Matrix (DAM)	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.
Data Item	means the most granular level of data defining a specific attribute in respect of a Data Type, the permissible values for which are defined and controlled in the Data Item Catalogue.
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.
Electricity Enquiry Service (EES)	Electricity Enquiry Service EES means the service described as such in the EES Service Definition.
Electricity Enquiry Service Provider	means the provider of the Electricity Enquiry Service.
Energy Supplier	Means a person which is either or both an Electricity Supplier and/of a Gas Supplier.
Market Participant	Means a participant in either or both of the gas and electricity markets of Great Britain each of which is identified by a Market Participant Role.
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.
Supplier Volume Allocation (SVA)	has meaning given to it under the BSC.

TERM	DEFINITION
Virtual Lead Party (BSC)	has meaning given to it under the BSC.