RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	**Final Recommendation**

CHANGE REPORT

R0060 - ERDS SERVICE DEFINITION TIMEZONE CORRECTION

DOCUMENT VERSION	2.0
PROPOSED IMPLEMENTATION DATE	27 June 2025
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	TECHNICAL EXPERT PANEL	**CHANGE PATH**	SELF GOVERNANCE
PRIORITY STATUS	LOW	**URGENCY**	STANDARD
IMPACTED STAKEHOLDERS	ERDS PROVIDERS, EES PROVIDER, CSS PROVIDER, SUPPLIERS		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	ASSURANCE LEAD
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OVERVIEW

This Change Proposal seeks to amend the Electricity Retail Data Service (ERDS) Service Definition to add in the Greenwich Mean Time (GMT) time zone to any time-based statements.

RESPONSIBLE COMMITTEE DECISION

On 28 August 2024, in line with the Code Manager Recommendation, the Technical Expert Panel voted to:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 27 June 2025.

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BACKGROUND

1 SUMMARY

The Electricity Retail Data Service (ERDS) Service Definition does not currently specify any time zones.

An example of the current legal text is:

> Data received by the Electricity Retail Data Agent (ERDA) shall be included within the ERDS Total Daily Processing on the basis that all data received prior to 23:00hrs is made available to the Supplier Meter Registration Agent (SMRA), Electricity Enquiry Service (EES) Provider or Central Switching Service (CSS) Provider (as applicable) by 06:00hrs the following Working Day.
>
> Data received after 23:00hrs will be made available to the SMRA, EES Provider or CSS Provider (as applicable) by the second Working Day.

CSS and UKLINK work in Local time and EES, Smart Metering Data Service Provider (SMDSP) and Metering Point Registration System (MPRS) work in Greenwich Mean Time (GMT), this is also known as UTC0.

All Data Transfer Service Market Messages (flows) must be in GMT, this is a S3P4V1-7_User_File_Design_S Requirement. Data Aggregators also require Market Message MM00109 (D0209) 'Instruction(s) to […] Data Aggregator' to be in GMT.

MPRS is the system through which ERDAs provide their service. If MPRS end of day closes an hour earlier than expected, due to the use of local time, it can lead to a delay in flow processing and systems becoming misaligned.

2 PROBLEM STATEMENT

The ERDS Service Definition does not specify the time with a specified time zone. This has led to some instances of MPRS close of day running at 22:00GMT instead of 23:00GMT. A confirmation of time zone is required within the ERDS Service Definition to negate any confusion or delays in flow processing and systems becoming misaligned.

3 IMPACTS

REC SERVICE PROVIDERS
ERDS Providers

REC DOCUMENTS / PRODUCTS
ERDS Service Definition

This change looks to update the REC, in the ERDS Service Definition, to reflect the operational systems and processes already in place.

Although not directly impacted, the consultation was highlighted to the EES Provider, CSS Provider and Suppliers to ensure awareness.

3.1 MARKET-WIDE HALF HOURLY SETTLEMENT (MHHS) IMPACTS

MHHS DESIGN	MHHS DATA SPECIFICATION	MHHS CODE DRAFTING
The MHHS Design explicitly states that operating hours are defined in clock time. Therefore, a change would be required if it is determined that operating hours should be defined in GMT.	No impact	Indirect impact - ERDS Service Definition

The ERDS Service Definition is impacted by MHHS code drafting. However, the amendments in R0060 are expected to be a change to the baseline only and do not directly impact the code drafting developed within the MHHS Programme.

4 CROSS CODE IMPACTS

The Code Manager raised this change with Elexon for their consideration of whether there is a need for a change for the Supplier Meter Registration Service in the Balancing and Settlement Code (BSC).

5 PROPOSAL PLAN

Milestone	Activity	From	To
Change Proposal		**01-Jun-24**	**20-Aug-24**
	Business Case Assessment	June	June
	Consultation	June	July
	Final Determination	July	August
Voting		**28-Aug-24**	**28-Aug-24**
	Appeal Window	29-Aug-24	12-Sep-24

6 STAKEHOLDER ENGAGEMENT

6.1 CROSS CODE ENGAGEMENT

The Code Manager engaged with the MPRS service provider and Balancing and Settlement Code (BSC) stakeholders to help determine if there is a cross code impact for the BSC. The Code Manager confirmed that R0060 and a BSC change would not need to follow an aligned change plan, as R0060 is a legal text clarification change only.

The Code Manager has continued engagement with the MPRS service provider during consideration of whether a MHHS Programme change request was required.

7 PRIORITY STATUS AND URGENCY

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	0	27	0
	Retail Markets Impact	Retail Risk(s)	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	0	7	0
		Legal and Regulatory Compliance	0	14	0
Resource	Complexity / Effort / Duration		1	9	9
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	0	10	0
				Overall Priority Score (rounded)	26

Priority Status	LOW
Change Proposal Type	STANDARD

The priority status for this Change Proposal is 'Low' based on a weighted prioritisation score of 26.

SOLUTION

8 PROPOSED SOLUTION

The REC currently states, under Schedule 1 – Interpretations and Definitions, General Interpretation paragraph 1.1(j), that 'a time is a reference to that time in the UK'.

The proposed solution is to progress a legal text clarification by adding in 'GMT' to the time-based statements relating to data processing within the ERDS Service Definition. The change does not seek to amend the technical systems themselves. Some ERDAs had not been aware that the MPRS operating time zone was not being changed to local time similarly to CSS local processing. These instances that caused issues at Switching Go-Live were corrected at the time. ERDS Providers have also confirmed, through a request for information by the REC Code Manager, that the proposed clarification meets with their understanding of how the systems are working.

The R0060 Consolidated RFI Responses v1.0 (05.03.2024), can be found on here.

8.1 MARKET-WIDE HALF HOURLY SETTLEMENT

DESIGN	DATA SPECIFICATION	DRAFTING
The MHHS Design explicitly states that operating hours are defined in clock time. Therefore, a change would be required if it is determined that operating	No impact	The amendments in R0060 are expected to be a change to the baseline only and do not directly impact the code drafting developed within the MHHS Programme. The proposed

hours should be defined in GMT		implementation will be post-MHHS implementation and therefore will not impact implementation of the MHHS code drafting.

8.2 BALANCING AND SETTLEMENT CODE

It should be noted that the correction being delivered through R0060 could create a misalignment between the REC ERDS provisions and the BSC Supplier Meter Registration Service (SMRS) provisions. This risk has been raised to Elexon.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0060 can be found here.

The legal text changes have been redlined against the current ERDS Service Definition; however, a view has also been provided against the MHHS code drafting version, which will be implemented before R0060.

The legal text also includes the inclusion of a new definition in Schedule 1 – Interpretations and Definitions, for GMT, to support the change.

10 PROPOSED IMPLEMENTATION DATE AND APPROACH

This change is a clarification of existing system operations and therefore does not in itself require any lead time. However, the implementation of the MHHS code drafting, at MHHS Programme milestone M8 ‘Code changes delivered’, is planned for March 2025 and includes updates to the ERDS Service Definition.

Although the proposed additions are expected to be a change to the baseline only and do not directly impact the code drafting that has been developed within the MHHS Programme, they will need to be applied to the version of the ERDS Service Definition updated for MHHS.

The proposed implementation date is therefore on the next available release after milestone M8. This will avoid complexity at the point of implementation for the MHHS code changes and avoid a need for a phased implementation for the R0060 legal text.

The approval of R0060 will provide clarity until its implementation.

PRELIMINARY ASSESSMENT

11 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

11.1 RISKS AND ISSUES

NO.	RISK	NOTES	MITIGATION

R0060.PCR.R001	R0060 highlights possible risks from not operating in clock time		Closed - No specific risks identified during consultation

No issues have been identified

11.2 ASSUMPTIONS AND DEPENDENCIES

N.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
R0060.CPP.A001	The changes that will be proposed under R0060 will not impact existing system processing.		Validated through request for information.
R0060.CPP.A002	There is no dependency on the progression of an MHHS Programme CR.	R0060 should progress whether an MHHS change is required or not.	Validated during initial assessment.
R0060.PCR.A003	Any changes to Performance SLAs reported by ERDS as a result of R0060 should only be applied from the implementation date.		Validated during initial assessment.

No dependencies have been identified.

12 BUSINESS CASE ASSESSMENT

12.1 COST BENEFIT ANALYSIS

There are no costs associated with the implementation of R0060 as it is a clarification only.

The Code Manager has not identified any benefits through R0060 that are quantifiable, but the change would bring about the following intangible benefits:

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
ACCURACY OF THE REC	R0060 will ensure the REC accurately reflects the ERDS operating hours throughout the year.
REDUCED RETAIL RISK	Clarity in the REC on the operating hours for ERDS will reduce the risk of impacts to flow processing from delays and systems being misaligned, and any associated consequences to Consumer-impacting processes.

12.2 COST BENEFIT ANALYIS SUMMARY

There are no costs associated with implementation of this Change Proposal therefore the benefits from implementation of this change are not impacted.

13 CASE FOR CHANGE

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;
- there are no costs associated with implementation of this change or ongoing operations;
- without implementation of this change, the delivery of the existing ERDS operations will not be accurately reflected in the REC;
- implementation of this change reduces risk to Consumer experience; and,
- a positive business case can be made, as set out in section 12 of this report.

14 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 28 June 2024 to obtain views on the Preliminary Change Report. In total four responses were received from Distribution Network Operators and Suppliers. The key themes from these responses have been summarised and set out below.

14.1 SUMMARY OF RESPONSES

14.1.1 COMMENTS ON THE PROPOSED SOLUTION AND LEGAL TEXT

All responses confirmed agreement with the proposed solution and legal text. One response clarified that this was on the basis of there being no system or process changes to ERDS as a result.

14.1.2 INTENTION TO ALIGN OF ERDS SERVICE DEFINITION WITH SYSTEM

Three responses agreed that the proposed changes within the ERDS Service Definition are aligning with existing system operations and will not impact their business processes.

One response asked for clarification on the technical impacts of the change.

14.1.3 IMPLEMENTATION APPROACH AND DATE

All responses confirmed agreement with the proposed implementation technique and date.

14.1.4 CHANGE PATH

All responses confirmed agreement with the Change Path, that this Change Proposal should be subject to Self-Governance approval by the Technical Expert Panel

14.2 ADDITIONAL FEEDBACK

During the consultation and final assessment period the EES Provider and CSS Provider took the opportunity to further consider the proposed solution and no impacts to their services have been identified.

15 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

One amendment to the change report.

DOCUMENT	SECTION	AMENDMENT	REASON
Change Report	8 – Proposed Solution	Addition of detail on instances of ERDA use of local time instead of clock time	To address conflict raised in consultation responses

16 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
REQUEST FOR INFORMAITON	R0060 Consolidated RFI Responses v1.0 (05.03.2024)
CONSOLIDATED CONSULTATION COMMENTS AND CODE MANAGER'S RESPONSES	Link

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17 GLOSSARY

TERM	DEFINITION
Central Switching Service (CSS)	means the Systems and processes provided or procured by the CSS Provider for the purpose of providing the Address Management Service and the Registration Service.
CSS Provider	means the DCC when performing functions under or in relation to this Code (but always excluding its functions under the Smart Energy Code and its roles as CSS Systems Integrator, SI Provider and Switching Operator), including in respect of the Central Switching Service and including in effecting the design, build and testing of any System that will allow it to perform functions under this Code after the CSS Go-Live Date. This role is the CSS Procurer and Manager function as described in the E2E Data Migration Plan, E2E Integration Plan, E2E Post Implementation Plan, E2E Testing Plan, E2E Transition Plan: Implementation Approach and E2E Transition Plan: In-Flight Switches Approach.
Data Aggregator (DA)	means the person Appointed by an Electricity Supplier to aggregate consumption data for an RMP as further described in the Balancing and Settlement Code.
Data Transfer Network (DTN)	has the meaning given to that expression in the Data Transfer Services Agreement.
Electricity Enquiry Service (EES)	means the service described as such in the EES Service Definition.
Electricity Retail Data Agent (ERDA)	means a provider of a DNO's Electricity Retail Data Service.
Electricity Retail Data Service (ERDS)	means the electricity registration services provided under this Code to support the provision of electricity retail data to the CSS and other services.
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Market Message	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
Metering Point Registration System (MPRS)	means the System used or procured by each DNO in order to provide the Electricity Retail Data Service in accordance with the REC and / or the Supplier Meter Registration Service in accordance with the BSC.
Supplier Meter Registration Agent (SMRA)	means the provider of the Supplier Meter Registration Service (SMRS) provided pursuant to the BSC.