RETAIL ENERGY CODE

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CONSOLIDATED CONSULTATION RESPONSES

R0066 – INCLUSION OF SMRS DATA ITEMS IN EES (BSC CP1568 CONSEQUENTIAL CHANGE)

On 04 November 2022 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0066.

The purpose of this document is to consolidate the responses as well as answer any questions raised within those responses.

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RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	09/12/2022
RESPONSIBLE COMMITTEE	CHANGE PANEL
LEAD ANALYST	GEMMA DIXON

DATE CONSULTATION ISSUED	04/11/2022
RESPONSE DEADLINE	25/11/2022

Questions 1:	**As a consequential change of BSCCP 1568, do you agree with the proposed solution? If not, please explain why?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy Limited (Energy Supplier)	N/A	
Anonymous (Energy Supplier)	Whist we recognise the intent of the change, we believe that it requires further clarification. The changes suggests that the new data items will be available in the daily update between EDRS and EES, as well as the EES and its API. The change mentions that the Data Access Matrix will be updated accordingly. The change is not clear on how the new data items will be presented in the EES API and their conditionality for industry parties. It is also not clear who will be able to access this information. We welcome any additional information which will aid with answering our questions.	The Data Access Matrix defines who will be able to access the data via the Electricity Enquiry Service (EES) and the conditionality for industry Parties. Please see Attachment C Data Access Matrix. The technical changes required to API will be defined as part of the design phase following approval. This will be confirmed and available as part of the Release Management activity.
National Grid Electricity Distribution (Distribution Network Operator)	No we do not agree with the proposed solution. It was highlighted in our IA response that there were two data items included in R0066 which were not included in BSC CP 1568. The “Background” section of this CP states that “Following SVG approval, the BSC identified a gap in BSC CP 1558. The Data Items were never defined in the BSC CP and therefore couldn’t be included in the EES solution for R0032. The BSC subsequently raised a new Change Proposal BSC CP 1568 Inclusion of new LDSO-mastered SMRS data items, to define these new Data Items and to include them into the EMAR Data Specification.”	The Code Manager has raised this with Elexon to highlight these concerns. The BSC have amended their Solution for BSC CP1568, to reflect the two additional Data Items previously missed, in their publication dated 29/11/2022. This results in the BSC and REC solutions being fully aligned, with the BSC solution now reflecting all Data Items that were detailed in R0066.

	The response from REC to our comments raised is: “Confirmed with BSC they are amending the CP1568 documents to include the Associated Import / Export MSID EFD and Associated Import / Export MSID ETD.” Currently BSC CP 1568 is not due to go before the BSC Panel until 6th December, therefore, the same scenario exists here as identified with BSC CP 1558 and R0032, where REC CP R0066 is requiring inclusion of data items into the EES and EMAR that have never been defined in a BSC CP	
Northern Powergrid (Distribution Network Operator)	Yes	
Scottish Power Energy Networks (Distribution Network Operator)	SPEN are supportive of the proposed solution	

Questions 2:	**Do you agree with the proposed implementation date and implementation technique? If not, please explain why?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy Limited (Energy Supplier)	Similar to R0032, it is unclear as to why this solution is being rushed to implementation while the MHHS re-plan is still underway. By implementation being premature we are more likely to need other MHHS change proposals to amend and fit changes that align better with the re-plan.	The Code Manager acknowledges and recognises the replanning activity currently under review by the MHHSP. RECCo and the Code Manager are engaged in the replan activity and believe there is low risk that the replan activity will impact this Change Proposal. Given the importance of the MHHS Programme, the early introduction of these key registration items will allow a sufficiently long period of data cleanse (which will be determined by BSC and the MHHSP), which in turn will significantly de-risk the migration activities.
Anonymous (Energy Supplier)	See our response to question 1.	The Data Access Matrix defines who will be able to access the data via the Electricity Enquiry Service (EES) and the conditionality for industry Parties. Please see Attachment C Data Access Matrix. The technical changes required to API will be defined as part of the design phase following approval. This will be confirmed and available as part of the Release Management activity.
National Grid Electricity Distribution (Distribution Network Operator)	The proposed Implementation date is 30/06/2022 which is incorrect. The correct implementation date should be included within the REC CP R0066. We also have a concern that the BSC CP Changes have a go live date of Thursday 29th June 2023, however, our understanding is that the REC release and EMAR specification changes,	Acknowledge the error – the Implementation date has been updated in the Final Change Report to reflect June 2023.

	do not go live until a Friday. Therefore, there will be data items which are "live" in BSC/MHHS which will not be live in REC/EMAR/EES until the following day.	This will be managed as part of the Release Management activity and a cutover plan is being developed between the REC and BSC.
Northern Powergrid (Distribution Network Operator)	Yes	
Scottish Power Energy Networks (Distribution Network Operator)	We are supportive of the proposal to align this with the BSC change implementation date, however since the baseline for MHHS is not yet agreed, it would be cognisant to keep a watching brief on development in case of changes.	The Code Manager acknowledges and recognises the replanning activity currently under review by the MHHSP. RECCo and the Code Manager are engaged in the replan activity and believe there is low risk that the replan activity will impact this Change Proposal.

Questions 3:	**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?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy Limited (Energy Supplier)	N/A	
Anonymous (Energy Supplier)	Yes.	
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree with the Code Manager's assessment of the Change Path.	
Northern Powergrid (Distribution Network Operator)	Yes	

Scottish Power Energy Networks (Distribution Network Operator)	Yes	

Questions 4:	**Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 30 June 2023? If not, please explain why?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy Limited (Energy Supplier)	No, for the reasons mentioned in question 2.	See response above in Q2.
Anonymous (Energy Supplier)	See our response to question 1	See response above in Q1.
National Grid Electricity Distribution (Distribution Network Operator)	This is the same question as Q2. Please see our response to Q2. Note that the REC CP R0066 states an implementation date of 30/06/2022	Implementation date corrected to June 2023.
Northern Powergrid (Distribution Network Operator)	Yes	
Scottish Power Energy Networks (Distribution Network Operator)	We are supportive of the implementation date (subject to confirmation from BSC and the MHHS Programme)	

Questions 5:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy Limited (Energy Supplier)	No further Comments.	
Anonymous (Energy Supplier)	See our response to question 1	See response above in Q1.
National Grid Electricity Distribution (Distribution Network Operator)	Assumption A2 **A2** | The design of the seven Data Items provided by the BSC will not change. | | Design will be locked down prior to BSC CP1568 being presented to SVG on 06 December 2022. As stated, two data items have not been included within the BSC CP 1568, therefore, the design will not be able to be "locked down" without these items. Currently it is unknown whether a further BSC CP will be raised for these two missing Data Items or amend the existing BSC CP 1568 and re-issue for further industry consultation. This should be recorded as a risk.	A2 - The BSC have amended their Change Solution for BSC CP1568 to include the two additional Data Items previously missed – the publication date for this was 29/11/2022 with a decision made to approve the BSC change at SVG on the 06/12/2022, therefore consider to be locked down following SVG approval.

	Assumption A3 **A3** | Amendments to Data Item formats as a consequence of MHHS, such as moving DateTime to high resolution, will be picked up in a consequential MHHS change. | | Will be validated with the BSC and MHHS Programme during Consultation period. Is this Assumption A3 not a contradiction to Assumption A2? Assumption A4 **A4** | Any data cleanse activity will be defined and agreed between BSC and the MHHS Programme. | R0066 is delivering consequential REC changes with BSC being the lead code. Any decisions on data cleanse activity are to be determined by BSC. | This is being validated through discussions with BSC and MHHS Programme. We have a concern that currently, the ownership of the migration and data cleanse activity has not been defined under the MHHS programme. There will be a significant piece of work to populate and cleanse these data items. This was noted under our responses to both BSC CP 1558 and BSC CP 1568 and needs to be taken into consideration to ensure sufficient resource is available to undertake this work. Until the MHHS Programme confirms ownership of the migration activity and sets out plans requiring these early changes, R0066 and its associated changes should be paused or withdrawn. The ”Case for Change” states that “by not delivering this Change Proposal, we risk poor quality data at MHHS go live and could lead to additional time and effort being spent trying to fix issues during the migration period”. However, without a clear understanding of what the migration period is and what this will require, we feel this is a moot point.	A3 – This assumption has now been validated and closed. MHHSP have confirmed that any Data Item dates introduced as part of the transitional changes are in the current standard format. We acknowledge any data cleanse activity may have significant impacts, however this is not within the scope of the REC Change. The data cleanse activity is being considered under MHHSP and any activity required from Parties will be defined and managed through the MHHSP and the BSC. Following approval of BSC CP1568 on the 06/12/2022, REC CP R0066 is required to enable the full solution to be implemented

	It is also stated that this Change Proposal is a consequential change of BSC CP 1558 which has already been approved, therefore if R0066 is not approved, the full solution cannot be delivered. However, as stated previously, R0066 is an incomplete solution as it includes two data items that have not been defined in a BSC CP.	ahead of any potential data cleanse activity. Given the importance of the MHHS Programme, the early introduction of these key registration items will allow a sufficiently long period of data cleanse, which in turn will significantly de-risk the migration activities.
Northern Powergrid (Distribution Network Operator)	No	
Scottish Power Energy Networks (Distribution Network Operator)	None	