RETAIL ENERGY CODE

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

CHANGE REPORT

R0118 – REVIEW OF SCHEDULE 12 AND PROCESSES TO MANAGE ACCESS TO DATA

CHANGE REPORT	FINAL
DOCUMENT VERSION	2.0
ISSUED DATE	17/10/2023
DOCUMENT APPROVAL STATUS	APPROVED

RESPONSIBLE COMMITTEE	CHANGE PANEL	CHANGE PATH	SELF GOVERNANCE
PRIORITY STATUS	HIGH	URGENCY	STANDARD

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	08/09/2023

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CHANGE OVERVIEW

A process which negates the restrictions on data accessibility and is adaptable enough to accommodate ongoing changes within the energy industry is required. This will enable valid data access use case permissions to be reflected within the Enquiry Services, Schedule 12 and the Data Access Matrices (DAM).

	High Impact: N/A
	Medium Impact: Code Manager, EES Provider, GES Provider, Enquiry Service Users.
	Low Impact: Consumers

RESPONSIBLE COMMITTEE DECISION

On **17 October 2023**, the Change Panel voted to **APPROVE** R0118 for implementation on 06 December 2023.

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BACKGROUND

1 SUMMARY

The Enquiry Services have been receiving a growing number of requests from users whose access use cases are valid, but they are not yet listed within Schedule 12 - Data Access. These users must go through the formal change process to have their market roles and access permissions included in Schedule 12 and the DAM. A process which negates the restrictions on data accessibility and is adaptable enough to accommodate ongoing changes within the energy industry is required.

RECCo has also identified an opportunity for Consumers to benefit from improved product and service offerings through an Open First Culture. Further work is being progressed and is highlighted in RECCo's Open Data Review paper.

The implementation of R0118 and the future move towards classification-based access within the REC will assist data access requests in the future. Classification-based access will be addressed through a future Change Proposal.

2 PROBLEM STATEMENT

Organisations with valid use cases for REC data access must raise a Change Proposal as they are not listed within Schedule 12 or the Data Access Matrix. This is a time-consuming process which delays the implementation of the required access and does not promote innovation, competition, and positive Consumer outcomes.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As a Consumer, I want Market Participants to have the appropriate data access so any issues affecting my energy account can be addressed easily.
C2	As a Consumer, I want Market Participants to have appropriate data access so that I can benefit from improved product and service offerings.
MARKET PARTICIPANT USER STORIES	
M1	As a Market Participant, I want the processes that grant data access to be simplified and adaptable so that valid data use cases are addressed quickly.

PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

Two potential new data access processes were evaluated by RECCo and the Code Manager. The preferred solution was solution option 1. Details on the other option considered can be found within the Preliminary Change Report.

Solution Option 1 would move elements of Schedule 12 – Data Access (a Category 1 document) to a newly created appendix within the Gas DAM and Electricity DAM. The DAMs would be changed from Category 2 documents to Category 3 documents. This would enable Data Access Requests to go through the more streamlined Category 3 change process.

This solution ensures due diligence remains in that, where appropriate, the Code Manager would Consult with industry and that the Performance Assurance Board (PAB) would approve Data Access Requests as part of its delegated function from the REC Board.

5 PROPOSED SOLUTION

The solution to this Change Proposal will make amendments to the process for requesting data access.

The Gas DAM and Electricity DAM will both move from a Category 2 to a Category 3 Document. A new appendix to the DAMs will also be added; the Enquiry Service User Category which will list the categories of Data Access and the purposes of the access. REC PAB will be the owner of the DAMs (and the new appendix). Schedule 12 and the REC Baseline Statement will be amended to reflect these new responsibilities. The PAB Procedures document will also be updated with a broad statement that the PAB will accept/reject any changes to the Category 3 documents in which it is responsible.

A proposal for access will be made by the applicant via the REC Portal and will be assessed by the Code Manager to confirm the details of the access request and whether the request is valid or not. This will include discussions with Service Providers on the validity/availability of requests and understand any costs associated with the request.

Where valid, the Code Manager will make a recommendation to the REC PAB, who acting in their delegated function from the REC Board will approve or reject the request.

Where a proposal would result in a Data Item being added, changed or removed in the relevant DAM the Code Manager will consult with all relevant organisations, including the Data Master for the Data Item. This includes consultation with Data Masters under other affected Energy Codes.

Where approvals are made an updated DAM will be published on the REC Portal.

The process will offer flexibility to support industry whilst still maintaining effective controls over the use of Consumer data and has been developed by the Code Manager in consultation with RECCo, Ofgem and through the REC Issues Group (RIG).

6 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0118 can be found here.

The following documents will be altered through R0118.

REC Product	Reason for Change
Schedule 12 – Data Access (Category 1)	The User Categories and Purposes will be removed from Schedule 12 and into a new appendix within the DAMs This will enable any new Users or Purposes (once validated) to more quickly be reflected within the REC as the Category 3 process is more streamlined. Schedule 12 will also detail the new process and responsibilities.
PAB Procedures (Category 3)	A broad clause has been added for the REC PAB to accept or reject any proposed changes to a Category 3 document in which it holds responsibility for.
Enquiry Service User Category (Category 3 appendix within the DAM)	The areas removed from Schedule 12 will be placed into this new REC appendix. This will enable any new Users and Purposes (once validated) to more quickly be reflected within the REC as the Category 3 process is more streamlined.
REC Baseline Statement (Category 3)	The Baseline Statement will reflect the following changes. - Electricity DAM and Gas DAM moved from Category 2 documents to Category 3 documents and under the ownership of REC PAB.

7 DELIVERY AGAINST CHANGE PROPOSAL PLAN

All milestones to date have been completed in accordance with the plan. The Change Proposal Plan can be found here.

8 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

8.1 RISKS AND ISSUES

No.	RISK	MITIGATION
R01	There is a perceived risk that a more streamlined process for data access may lose the required controls.	This will be mitigated by Code Manager assessment, PAB approval and industry Consultation where the use case is unknown and needs to be tested.

9 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	06/12/2023	PROPOSED IMPLEMENTATION APPROACH	BIG BANG

The December extraordinary release has been identified as the most appropriate to ensure the benefits of a speedier process for user access requests can be realised now. This will also ensure that Change Proposals currently in the portfolio on data access can now follow this process following Code Manager evaluation.

10 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 08 September 2023 to obtain views on the Preliminary Change Report. In total, 5 responses were received from one Supplier, one Distribution Network Operator (DNO), one non-REC Party (Third Party Intermediary), and two Service Providers.

The responses have been consolidated and comments provided by the Code Manager and can be found here. The key themes from the responses have been summarised and set out below.

10.1 SUMMARY OF RESPONSES

10.1.1 COMMENTS ON THE SOLUTION AND LEGAL TEXT

All respondents agreed that the proposed solution resolves the problem statement and that it provides improved flexibility and adaptability for data access requests.

There were some queries around the appendix to the DAM and whether this needed to be reflected within the REC Baseline Statement. It was confirmed through the Code Manager's responses to the Consultation questions that the Baseline Statement will not include this document, as following legal advice, it would become part of the DAM itself.

There were some suggestions to the legal text where respondents believed it would make the intention clearer. The Code Manager reviewed these suggestions and took the decision not to update the legal text as it had already undergone legal review and the proposed amends were not consequential.

All respondents agreed that the new process maintains the appropriate controls for data access.

10.1.2 IMPLEMENTATION APPROACH AND DATE

All respondents agreed with the proposed implementation date and approach.

10.1.3 OTHER COMMENTS

One respondent requested clarity on how industry communications for data access will be received. This process will follow the current BAU process for Cat 3 Changes via the Change Bulletin and other ad-hoc email communications.

A further respondent highlighted that the appropriate people may not be effectively targeted through the BAU communications channels as technical, and regulation focussed representatives are currently subscribed to these communications. The Code Manager will continue to monitor engagement with this new process and seek to ensure there is rounded and proportionate visibility of each access request and action any improvements identified for communications in future.

11 BUSINESS CASE ASSESSMENT

There are no costs associated with the implementation of R0118 and the intangible benefits are listed below.

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
Market Participants being able to perform their required functions adequately	A defined, streamlined, and controlled process for data access would ensure Market Participants could perform their required functions adequately and without restriction.
Adaptable process	This new process would be adaptable enough to accommodate ongoing changes within the energy industry and the journey to net-zero which will ultimately benefit Consumers.

12 CASE FOR CHANGE

12.1 SELF-GOVERNANCE

The Code Manager considers that there is a positive case 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 a defined, streamlined, and controlled process for data access which will ensure data is provided efficiently to those with a valid reason;
- The proposed solution is adaptable enough to accommodate changes within the energy industry for the ultimate benefit of Consumers.

13 CODE MANAGER'S RECOMMENDATION

Based on 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 Change Panel:

- **APPROVE** the proposed change solution;

- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of **06 December 2023**.

14 RESPONSIBLE COMMITTEE DECISION

This report was discussed at the REC Change Panel meeting on 17 October 2023.

The REC Change Panel voted to:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of **06 December 2023**.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
[CONSOLIDATED CONSULTATION COMMENTS AND CODE MANAGER'S RESPONSES]	Link

16 GLOSSARY

TERM	DEFINITION
Category 3 Product	refers to the operational documents and RECCo guidance which are required to support, but do not place obligations upon, market participants and as such will be maintained by the Responsible Provider.
Data Access Matrix (DAM)	means the matrix describing which Enquiry Service Data each Enquiry Service User Category can access, which forms part of the Data Specification and is updated in accordance with the Data Access Schedule.
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.
Gas Enquiry Service (GES)	means: (a) until CSS Go-Live Date, the enquiry service provided pursuant to the UNC which allows authorised users to access Gas Retail Data; and (b) from CSS Go-Live Date, the service of that name procured by RECCo pursuant to the Data Access Schedule.

TERM	DEFINITION
Gas Enquiry Service Provider	means the provider of the Gas Enquiry Service.
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.
REC Performance Assurance Board	means the performance assurance board for this Code, as from time to time established under Clause 15 of the main body of this Code (which is a Sub-Committee).