RETAIL ENERGY CODE

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

CHANGE REPORT

R0158 – AMENDMENT TO THE 'SUPPLIER REGISTRATION REPORT (MAP)' REPORT METHODOLOGY

CHANGE REPORT	FINAL
DOCUMENT VERSION	1.0
ISSUED DATE	12/04/2024
DOCUMENT APPROVAL STATUS	POST-VOTE

RESPONSIBLE COMMITTEE	TECHNICAL EXPERT PANEL	CHANGE PATH	SELF-GOVERNANCE
PRIORITY STATUS	LOW	URGENCY	URGENT STANDARD

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	15/03/2024

LEAD CHANGE ANALYST



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CHANGE OVERVIEW

Meter Asset Providers (MAPs) can query the Gas Enquiry Service (GES) as part of their billing process to establish the Registered Gas Suppliers of their portfolio of Metering Assets. The reports via which MAPs can query the GES are not currently working exactly as intended due to incorrect wording in the GES Definition; this change seeks to rectify that.

	High Impact: N/A
	Medium Impact: N/A
	Low Impact: Meter Asset Providers

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CODE MANAGER'S RECOMMENDATION

On the 24 April 2024 the Technical Expert Panel voted unanimously to **APPROVE** Change Proposal R0158 for implementation on 28 June 2024.

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BACKGROUND

1 BACKGROUND

The “Supplier Registration Report (MAP)” is a data report provided to Meter Asset Providers (MAPs) upon request by the Gas Enquiry Service (GES) Provider. The purpose of this report is to provide a MAP with a Registered Gas Supplier ID against each of the Metering Assets that the MAP provides, so that the MAP is able to identify Suppliers of its Metering Assets. Receipt of information for a given Metering Asset is contingent upon the GES Provider being given three identifying pieces of information that prove that the MAP owns the Asset in question: The Meter Serial Number, the Meter Point Reference Number (MPRN) and the model name.

This report is not currently working exactly to its intended functionality. Due to a drafting error made at a time before these reports were incorporated into the REC, MAPs are not being provided with complete and accurate information about who supplies their portfolios. The report text states that MAPs may only receive information back from the GES Provider “where the MAP is recorded within the Central Gas Register”. This statement was initially included as a precaution to prevent MAPs from inappropriately accessing Supplier data for Metering Assets not within their portfolio. Previously, when the UNC defined criteria to enable MAPs to access Supplier data for their portfolio, the test for whether MAP ID is recorded within the central gas register was not the relevant test; rather, it was the three key criteria outlined previously (MPRN, Meter Serial Number, model name). However, MAP ID was not recorded within the Central Gas Register at the time, and is not a mandated field in Market Messages pertinent to UK Link that fall outside the REC.

As a result, the requirement to only permit MAPs recorded within the Central Gas Register, whilst well-intentioned at the time, has created a scenario in which MAPs are excluded from accessing their portfolio data. As there was never an intention for the MAP to be recorded within the Central Gas Register at the time of drafting in 2013, an impossible requirement has been made by the revised wording. This change seeks to update the wording of the reports and restore their intended functionality.

2 PROBLEM STATEMENT

The GES Service Definition defines two reports that MAPs can use to query the GES to find out which Registered Gas Suppliers supply Metering Assets in their portfolio, so that they can bill them. Due to a drafting error in the GES Service Definition, this report is not working as intended, and MAPs are not able to ascertain the Registered Gas Supplier for their entire portfolio. This change seeks to rectify the drafting error and restore the intended functionality of the two reports.

3 USER STORIES

REF.	USER STORIES
MARKET PARTICIPANT USER STORIES	
M1	As a Registered Gas Supplier, I want to receive accurate invoices from MAPs for use of their Metering Assets, so that I am not over or under charged.
M2	As a MAP, I want to be able to access accurate information about my portfolio so that I can be correctly remunerated by Suppliers.

REF.	USER STORIES
MARKET PARTICIPANT USER STORIES	
M3	As the GES Provider, I want the reports that I am obligated to provide to be correctly defined, so that I am able to provide accurate data to MAPs regarding their portfolios.

PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

This change has a fully formed solution. The Code Manager determined that the proposed solution appropriately resolved the problem statement and therefore no further analysis was required.

Changes to the Data Access Matrix have been ruled out, as the category condition for access to Data Items by MAPs, CC06, already requires that MAPs provide the MPRN, Meter Serial Number & model name. As such, the DAM in its current state already reflects the correct access requirement for provision of report data to MAPs.

5 PROPOSED SOLUTION

5.1 PROPOSED SOLUTION

The Code Manager proposes modifying the GES Definition to change the wording of Section 10 – Reporting. Specifically, the Code Manager proposed to update the definition of the "Supplier Registration Report (MAP)". Currently, the wording of this report reads as follows:

REPORT NAME	TIMESCALE	DESCRIPTION
Supplier Registration Report (MAP)	On Request	A report provided on request to the relevant MAP, specifying the Registered Supplier and Metering Asset details for all Supply Meter Points where the MAP is recorded within the Central Gas Register

The Code Manager is proposing to amend the wording as follows:

REPORT NAME	TIMESCALE	DESCRIPTION
Supplier Registration Report (MAP)	On Request	A report provided on request to the relevant MAP, specifying the Registered Supplier for those Metering Assets for which the MAP meets the relevant requirements specified in the Data Access Matrix.

This change will remove the incorrect drafting that requires the MAP to be recorded within the Central Gas Register and replaces this requirement with one to provide the three identifying pieces of information defined within the current Gas DAM, where MAP access to Data Items is contingent on the "CC06" requirement.

5.2 MARKET-WIDE HALF HOURLY SETTLEMENT IMPACTS

MHHS DESIGN
No impact

MHHS DATA SPECIFICATION
No impact to Market Messages or Data items
No impact to Data Specification documents

MHHS CODE DRAFTING
No impact

This change is a gas only change and is therefore out of scope of the Market-wide Half Hourly Settlement (MHHS) Design. No consequential impacts or alignment to the electricity market are expected for consideration as a result of the change.

The REC documents and products expected to be impacted by this change are not impacted by MHHS code drafting.

6 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0158 can be found here.

7 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

7.1 SERVICE PROVIDER IMPACT ASSESSMENTS

No impact has been identified for any REC Service Provider. The Code Manager confirmed with the GES Provider that they did not need to undergo impact assessment for this Change. The GES Provider confirmed that they do not need to modify or alter their systems in any way to accommodate the proposed solution.

7.2 REC PARTY IMPACT ASSESSMENTS

The Code Manager has not identified any impact for REC Parties as a result of the proposed solution, and as such, no impact assessment activity was required.

8 DELIVERY AGAINST CHANGE PROPOSAL PLAN

Progression of this change has so far taken place in line with the Change Proposal Plan, which can be found here.

9 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

9.1 RISKS & ISSUES

No.	ISSUE	NOTES	HOW TO PROGRESS
1	This Change is likely to precipitate a broader review of the Gas Data Access Matrix (DAM) Category Conditions.	The proposer has identified a number of possible changes to the DAM that are outside the scope of this change. These possible changes are not required to resolve the problem statement for this change, but may be beneficial in a broader sense.	Will be explored as part of the REC Issues process.

10 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	28/06/2024

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

The Code Manager is proposing that this change is implemented in the June 2024 release.

11 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 15 March 2024 to obtain views on the Preliminary Change report, which can be found here. In total, one response was received, from a MAP. The responses have been consolidated and comments provided by the Code Manager. This can be found here.

The key themes from these responses have been summarised and set out below.

11.1 SUMMARY OF RESPONSES

11.1.1 COMMENTS ON THE SOLUTION AND LEGAL TEXT

The respondent agreed that proposed solution will achieve the desired outcome and restore the intended functionality of the Supplier ID (MAP) Report. The respondent identified some broader changes that they would like to see, such as improved data accuracy surrounding the MAP ID Data Item, and improved process for provision of the MAP ID by relevant industry parties. The Code Manager takes this feedback on board, and will explore it as part of the broader review referred to in Issue No.1 in Section 9 of this report.

11.1.2 BENEFITS RELATIVE TO IMPLEMENTATION AND OPERATIONAL COSTS

The respondent reported that implementation of the proposed solution will result in more metering asset data, which would be beneficial to them operationally.

As this Change does not have any Central System costs, or anticipated REC Party and/or non-REC Party service user costs, the Code Manager did not look to consult on operational costs.

11.1.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

The respondent agreed with the Code Manager's assessment that the proposed solution constitutes a positive case for change.

11.1.4 IMPLEMENTATION APPROACH AND DATE

The respondent agreed with the Code Manager's proposed implementation approach and date.

12 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

DOCUMENT	SECTION	AMENDMENT	REASON
Gas Enquiry Service Definition	Supplier Registration Report "MAP"	A report provided on request to the relevant MAP, specifying the Registered Supplier ~~and Metering Asset details~~ for ~~all Supply Meter Points where the MAP meets the "Meter Point Request Information"[1] criteria~~ those Metering Assets for which the MAP meets the relevant requirements specified in the Data Access Matrix. ~~1 Defined in Uniform Network Code (UNC) Transportation Principle Document V5.16.2: Meter Point Reference Number, Meter Serial Number and Model Name.~~	Following advise from the Code Manager's legal counsel, we have amended the wording of the report description to simplify the requirement. We have also removed the explanatory footnote as part of this amendment. Whilst this amended wording has been introduced post consultation, the Code Manager is confident that this does not materially change the legal text as it was presented.

13 BUSINESS CASE ASSESSMENT

13.1 COSTS

There are no Central System costs associated with the implementation of the proposed solution.

13.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
Improved Legal & Regulatory Compliance	The Code Manager expects that the proposed solution has the potential to yield an improved confidence in data quality, and a reduction in the need for MAPs to obtain supplier data for their portfolio outside of the recognised reporting pathways.
Improved Strategic Alignment w/ REC Objectives	The Code Manager expects the proposed solution to result in the protection of consumer data, as well as driving improvement in the operation of rec central systems (the GES provider).

13.3 COST BENEFIT ANALYIS SUMMARY

As there are no Central System costs, but identifiable benefits to REC Parties (Gas Suppliers) and non-REC Party service users (MAPs), the Code Manager believes that this change meets the cost benefit test.

14 CASE FOR CHANGE

14.1 SELF-GOVERNANCE

The Code Manager considers that there is a case for change to implement this solution, on the basis that it:

- Is both viable and implementable, and it appropriately resolves the problem statement; and
- Is cost effective and proportionate to the anticipated benefit.

15 CODE MANAGER'S RECOMMENDATION

Based on the evidence provided in sections 13 and 14 of this report, the Code Manager considers that a positive business case can be made for implementing this solution.

The Code Manager recommends that the REC Technical Expert Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 28 June 2024.

16 RESPONSIBLE COMMITTEE DECISION

This report was discussed at the Technical Expert Panel meeting on 24 April 2024.

The Technical Expert Panel voted to:

- **APPROVE** the proposed change solution.
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 28 June 2024.

17 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED CONSULTATION RESPONSES	Link

18 GLOSSARY

TERM	DEFINITION
Central Gas Register	means the register of Supply Meter Points maintained by the CDSP.
Data Access Matrix	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.
Gas Enquiry Service	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.
Gas Enquiry Service Provider	means the provider of the Gas Enquiry Service.
Gas Supplier	means a person holding a Gas Supply Licence.
Meter Asset Provider	means the person that makes the Metering Assets for an RMP available for use by the Registered Supplier and the Consumer.
Meter Point Registration Number	means the unique reference number used to identify gas Supply Meter Points.
Meter Point Request Information*	Defined in Uniform Network Code (UNC) Transportation Principle Document V5.16.2: Meter Point Reference Number, Meter Serial Number and Model Name.
Meter Serial Number	means the serial number that identifies the meter at an RMP
Metering Asset	shall have the same meaning as Metering Equipment.
Uniform Network Code	means the Uniform Network Code established under the Gas Transporter Licences.

* - Definition not found within REC Schedule 1 – Interpretations & Definitions.