RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0162 ACCESS TO SDES FOR GAS NETWORKS

On 03 April 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for R0162 Access to SDES for Gas Networks.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	06 May 2025
RESPONSIBLE COMMITTEE	Technical Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	03 April 2025
RESPONSE DEADLINE	29 April 2025

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	This solution only meets the problem of Supplier / Gas Transporter communication. We would like to see a common communication method between Supplier and Shipper and GT, where parties fulfil both roles. For this solution to work fully, bespoke PT codes for gas should be developed and the use of the SDEP for gas should be made mandatory. We would also like the solution to mitigate any duplication using two different systems for the same queries i.e. CMS and SDEP, to reduce a two-tiered system.	Thank you for your comments. New screens are being created for gas, but we are using analogous electricity screens as a starting point for development. The use of SDEP for Gas Transporters (GTs) is not being made mandatory under R0162. However once this is set up and Gas Transporters have access, there may be future changes that mandate the use of SDEP for certain processes. CMS covers GT to Shipper communications, so there is no plan to include Shippers separately in this change. The Code Manager will do what is possible to mitigate duplication, but will require support from Parties post implementation in feeding back if they are receiving a lot of duplicate queries over SDEP and CMS so that can be reviewed between Codes.

Scottish Power Energy Retail (Energy Supplier)	We welcome the proposed solution. However, it would be interesting to find out if there were other solutions that can be explored apart from SDEP.	Thank you for your comments. SDEP is the standard means of secure data exchange under the REC and there are no plans at this time to look at introducing a new secure data exchange system.
SGN (Gas Transporter)	Our usage of the service will be dependant on the overarching cost to GT's and we would need sight of this prior to agreeing to utilise the service. Of which we understand will be optional.	Thank you for your comments. The use of SDEP for Gas Transporters is not being made mandatory under R0162.

Question 2:	Do you agree that the proposed SDEP use cases are appropriate? Please list any further screens you believe should be included for specific circumstances, or screens that could be excluded, providing a rationale for each.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	Using the same PT for both gas and electricity will cause additional resource burdens on parties where their business models do not have dual fuel teams. Should new PT's not be created for Gas, there is a risk that cases raised will be missed, therefore we will only support the creation of new PT's for this change.	Thank you for your comments. New screens are being created for gas, but we are using analogous electricity screens as a starting point for development. The Service Provider impact assessment will give more detail on the screens. The Code Manager expects to bring these to a future Change Issues Group.
Scottish Power Energy Retail (Energy Supplier)	We agree with the suggested SDEP PT screens	Thank you for your comments.
SGN (Gas Transporter)	As we do not currently have sight of the system we are unable to advise on additional requirements at this point or how frequently we may utilise the service if at all.	Thank you for your comments.

Question 3:	Do you agree with the proposed data items for each SDEP screen? Please list any additional items you require or any data items that could be excluded, providing a rationale for each.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE broadly has no issue with the proposed data items but again would re-iterate the need to separate gas from electric with new PT codes and so would suggest bespoke data items for gas and electric. We would also wish to ensure there is no duplication with queries raised via the Xoserve CMS portal.	Thank you for your comments. Please see the Code Manager's response to Question 1.
Scottish Power Energy Retail (Energy Supplier)	As above. we agree with the suggested data items listed.	Thank you for your comments.
SGN (Gas Transporter)	n/a	n/a

Question 4:	Do you believe that there is a benefit in having escalation Process Types to support each of the proposed use cases? Please provide a rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE feel there is a benefit and support an escalation process.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	Yes indeed, we agree there should be an escalation process for each of the suggested process types to ensure there is a managed process to make sure queries are getting worked.	Thank you for your comments.
SGN (Gas Transporter)	This would be useful however as there are no obligations/contractural relationships between Suppliers and Gas Transports therefore it is difficult to see where these could be placed.	Thank you for your comments.

Question 5:	For each Process Type, would you see benefit in an Energy Supplier to GT Scenario Variant, as well as a GT to Energy Supplier Scenario Variant?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	Suppliers would want reciprocal communication method to GTs.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We deem it beneficial to have this variant between Suppliers and GTs for each of these Process types.	Thank you for your comments.
SGN (Gas Transporter)	Without volumes and subject context we are unable to assess if GT's could support Supplier to GT communications. It would be of benefit under any safety / theft scenarios.	Thank you for your comments.

Question 6:	Do you have an estimate of how many users would require access to each PT?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	At this time, no, however it would be beneficial for REC to apply the same measures under the recent SDEP changes to reduce the resource burden on parties adding users to the PT's	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We are not able to provide this information yet. We would require an estimation from the GTs of the volumes they are looking to send via SDEP before we can estimate the number of resources to be allocated to these PTs.	Thank you for your comments.
SGN (Gas Transporter)	The number of users requiring access would likely be limited to less than 10.	Thank you for your comments.

Question 7:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	No lead time required for the implementation of the change, providing REC are able to add users to the PT's.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We would not require any lead times to implement the proposed solution.	Thank you for your comments.
SGN (Gas Transporter)	No lead time required beyond Business Process roll out to impacted users as far as we are aware based on the information provided.	Thank you for your comments.

Question 8:	Do you foresee any risks to your MHHS implementation, qualification or migration plans caused by the delivery of this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	We do not see any risk to MHHS	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	n/a	n/a
SGN (Gas Transporter)	n/a	n/a

Question 9:	Would implementing the proposed solution incur any costs to your business? If so, please provide details breaking down design/build/test costs and on-going costs. If preferable, please indicate which of the below ranges your costs may fall: A) Nil; B) Up to £9,999; C) Between £10,000 and £49,999; D) Between £50,000 and £99,999; or E) more than £100,000.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	B) Up to £9,999	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We are unable to provide cost estimation at this point.	Thank you for your comments.
SGN (Gas Transporter)	A) None that we are aware of at this time.	Thank you for your comments.

Question 10:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	Simplified, secured resolution of issues with GTs, providing this is mandated for the GTs to use it.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We cannot identify any specific benefits of this. However, having a central system to manage this rather than via emails will definitely improve the escalation process.	Thank you for your comments.
SGN (Gas Transporter)	We would expect this could facilitate the secure transfer of information in identification of Theft of Gas, Safety and Audit trail of information.	Thank you for your comments.

Question 11:	Taking into consideration both the costs and the benefits seen by your organisation, do you consider this change should be made?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	Please see Q1. SSE would prefer a holistic approach to Shipper/Suppliers.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	Yes.	Thank you for your comments.
SGN (Gas Transporter)	We are unable to provide a view as we have no visibility of any costs which could be incured as part of the service.	Thank you for your comments.

Question 12:	Do you have any further comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	No.	n/a
Scottish Power Energy Retail (Energy Supplier)	No further comments to make at this stage.	n/a
SGN (Gas Transporter)	Is there a level of engagement /usage required by GT's/IGT's for this proposal to progress or will this change progress regardless of engagement or utilisation.	Thank you for your comments. There is no level of engagement or commitment required by GTs for this change to progress. However any future changes that look to add new PTs requiring GT use or mandate the use of SDEP for any Supplier/GT processes will likely look at the uptake at that time as part of their business case.