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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0238 – PERFORMANCE ASSURANCE REPORTING CATALOGUE (PARC) ANNUAL REVIEW

On 21 February 2025, the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for R0238.

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
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RESPONSIBLE COMMITTEE	Performance Assurance Board
LEAD ANALYST	James Hardy

DATE IMPACT ASSESSMENT ISSUED	21/02/2025
RESPONSE DEADLINE	14/03/2025

Question 1:	Do you have any comments on the proposed solution and updated PARC text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	We have identified no issues with the proposed solution.	Thank you for your response.
ScottishPower (Energy Supplier)	We agree that the proposed changes to the PARC would be beneficial in ensuring that it is current and accurate. However, we note that we and other parties have previously raised historical concerns about the 1431 Gaining Supplier Switching Data and 1441 Losing Supplier Switching Data MPxN-level reporting detailed in the catalogue. Given that those concerns remain, and remain unaddressed, we believe that, in addition to the changes proposed by the Code Manager, those reports should be amended to request aggregated data in place of MPxN-level data or otherwise be removed from the PARC.	Thank you for your response. We note the comments regarding the provision of meter point level data in the switching data reports. The reason for requesting meter point level data within these reports is to allow the data within these reports (which is not otherwise available from central data sources) to be combined with the data available to the Code Manager from central data providers in particular from the Central Switching Service. Some (non-exhaustive) examples include: • Identifying where high risk driver scores (which are measured based on number of meter points) are as a result of single switching events that relate to a large number of meter

		points – typically in a non-domestic context. • Identifying where specific exceptions (e.g. high objection rates) can be correlated to particular sub-categories of switches – e.g. specific switching sources. There have been several Performance Assurance interventions in the last 12 months where the underlying cause was a particular switching source for a party and greater visibility of this via data would allow earlier identification and action if data was provided consistently across the market. There is detail provided in the DPIA which is available on the REC Portal as to the rationale for obtaining meter point level data and the controls and processes operated within Data Processing. We do not believe in this instance replacing 1431 / 1441 with an aggregate version would achieve the same benefits but we acknowledge the questions raised. We intend to use our next PA Check-in to discuss the matter further with the commenting Party and we would be open to proposals from the Party for an alternative data collection option

		that would allow data to be provided that would still achieve the intended outcomes without the need for meter point level data collection. As there was no change proposed to these reports within the scope of this change we do not propose to make further changes to the PARC at this stage but any identified options will be progressed as a separate change.

Question 2:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	Yes	Thank you for your response.
ScottishPower (Energy Supplier)	In previous years, we and other parties have raised concerns regarding the scope of information requested in the 1431 Gaining Supplier Switching Data and 1441 Losing Supplier Switching Data reports. We remain concerned regarding the data protection implications, including the privacy and confidentiality of customer information, as well the principle of data minimisation. Specifically, we believe that these outstanding and important concerns on the requirement to provide MPxN-level customer data to the Code Manager in this format have not been adequately considered or addressed. We note and welcome the previous removal of Complaints data reporting from the PARC (through C3-0015), which also involved MPxN-level data. We believe that the same arguments extend to both the 1441 and 1431 reports. We would be happy to support the redesign of these reports to an aggregate level. Alternatively, we would support their removal from the PARC. In essence, in addition to the changes proposed by the Code Manager, these reports should be amended to request aggregated data in place of MPxN-level data or otherwise be removed from the PARC.	Please see our response to the similar comments under question 1.

Question 3:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	We have not identified any alternate solutions.	Thank you for your response.
ScottishPower (Energy Supplier)	We have out our complementary proposals in our responses to Questions 1 and 2.	Please see the Code Manager responses to Questions 1 and 2.

Question 4:	Do you think we have identified and considered all processes and scenarios that may be impacted through the implementation of the proposed change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	Yes	Thank you for your response.
ScottishPower (Energy Supplier)	We have no additional comments to make on the implementation of this proposal at this time.	Thank you for your response.

Question 5:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	We do not believe these changes have any impact on our business.	Thank you for your response.
ScottishPower (Energy Supplier)	We have no additional comments to make on the implementation of this proposal at this time.	Thank you for your response.

Question 6:	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**
Scottish Power Energy Networks (Distribution Network Operator)	No costs to our business have been identified.	Thank you for your response.
ScottishPower (Energy Supplier)	We have no additional comments to make on the implementation of this proposal at this time.	Thank you for your response.

Question 7:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	We have not identified any benefit to our business through the implementation of the proposed solution.	Thank you for your response.
ScottishPower (Energy Supplier)	We believe that a current and accurate PARC will benefit all parties to the Code.	Thank you for your response.

Question 8:	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**
Scottish Power Energy Networks (Distribution Network Operator)	We believe that it is appropriate that these changes be made.	Thank you for your response.
ScottishPower (Energy Supplier)	Taking into account our responses to Questions 1 and 2, we are supportive of this change being made, alongside work to revise the Gaining/Losing Supplier Switching Data reports from MPxN level data to aggregate-level data, or alternatively to remove those reports from the PARC.	Thank you for your response.