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01	Proposal Plan
02	Impact Assessment
03	**Consultation**
04	Final Recommendation

CHANGE REPORT

R0277 – DATA LATENCY SLA ALIGNMENT FOR GAS ENQUIRY SERVICE

DOCUMENT VERSION	1.0
PROPOSED IMPLEMENTATION DATE	27 February 2026
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Technical Expert Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	Medium	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	GES Provider and GES Users		

LEAD ANALYST (SOLUTION LEAD)	SUBJECT MATTER EXPERT
BELA ASHWORTH	GLENN SHEERN
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OVERVIEW

The current performance levels for the processing of data from the Central Data Service Provider (CDSP) is no longer fit for purpose and does not align with system or service performance. The CSDP is also not meeting these Performance Levels on a monthly basis. While there are no known issues on data latency raised by users, this change to clarify Performance Levels is needed for the Gas Enquiry Service (GES) reinstated contract and to ensure ongoing service delivery.

CODE MANAGER MINDED-TO POSITION

The Code Manager recommends that the Technical Expert Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 27 February 2026.

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BACKGROUND

1 SUMMARY

The REC's GES Service Definition provides Performance Levels for the processing of data from the CDSP. The levels were introduced as part of the Central Switching Service (CSS) programme in 2022 without reference to system capability or industry demands. In its current form, the Performance Levels are no longer fit for purpose and do not reflect the operational capability of the service. Additionally, the CDSP is not currently meeting the Performance Levels on a monthly basis. The current wording of the Performance Levels also lead to ambiguity around the process time for data transferring through the UK Link estate and into the GES platform.

This Issue proposes a revision of the Performance Levels to better align with system and service performance. The GES Definition document, Section 8.5 Processing of data from the CDSP will be amended to clarify the requirement for data to be accepted and processed by the CDSP/UK Link before it is made available to Authorised Persons. Section 8.5 (a) will be further amended to clarify the processing time is within four hours of the data having been accepted and processed.

It is important to note that UK Link and its CDSP function falls beyond the remit of REC and there is no intention to implement or discuss changes to the SLAs for UK Link within this Issue. This proposal intends to separate the data processing and measurement requirements for UK Link and GES, as each should have its own SLAs – UK Link's under the Uniform Network Code (UNC) and the GES under the REC. Additionally, while there are currently no known issues related to data latency raised by users, nor complaints raised over the past three years, this Change Proposal is considered high priority due to its incorporation into the GES reinstated contract and will impact ongoing service delivery.

2 PROBLEM STATEMENT

The current Performance Levels for the processing of data from CDSP is no longer fit for purpose and does not align with system or service performance. The CSDP is also not meeting these Performance Levels on a monthly basis. While there are no known issues on data latency raised by users, this Issue to clarify Performance Levels is needed for the GES reinstated contract and to ensure ongoing service delivery.

3 IMPACTS

CONSUMERS
Gas

REC SERVICE PROVIDERS
GES

REC DOCUMENTS / PRODUCTS
Gas Enquiry Service Definition
REC Schedule 1 – Interpretations and Definitions

MHHS
This Change Proposal has no impacts on MHHS.

4 CROSS-CODE IMPACTS

There are no cross-code impacts identified with this Issue.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**21 Aug-25**	**10 Oct-25**
	Solution Development	August	September
	Code Manager Initial Assessment	September	September
	Legal Review	September	September
	Business Case Assessment	September	October
Change Proposal		**11 Oct-25**	**25 Nov-25**
	Consultation	October	November
	Final Determination	November	November
Voting		**26 Nov-25**	**26 Nov-25**
	Appeal Window	27 November	10 December

The Code Manager is proposing that this Change Proposal proceeds straight to consultation as there is minimal impact to Parties and the GES Service Provider has confirmed that a Service Provider Impact Assessment is not needed. Additionally, this Change Proposal is needed to align the REC with the reinstated GES contract arrangements, so we are aiming for implementation in February 2026.

6 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	0	27	0
	Retail Markets Impact	Innovation and Market Arrangements	0	17	0
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	3	7	20
		Legal and Regulatory Compliance	3	14	43
Resource	Complexity / Effort / Duration		3	9	28
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		1		8
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	3	10	30
				Overall Priority Score (rounded)	137

Priority Status	MEDIUM
Change Proposal Type	STANDARD

The Code Manager has given this Change Proposal an urgency score of three as the new Performance Levels have already been incorporated into the GES reinstated contract, so this change is needed to ensure the contract and the REC are in alignment. For this reason, although this Change Proposal does not meet Ofgem's Urgency criteria, we are treating it as urgent and will look to implement this change at the next available release date.

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SOLUTION

7 PROPOSED SOLUTION

The proposed solution is to amend the legal text of the REC's Gas Enquiry Service Definition, 8.5 (a) and (b), as shown below. A legal review has been conducted by the REC legal advisors.

> 8.5. The GES shall process data received from the CDSP in accordance with the following Service Levels:
>
> (a) data required within the Supply Point Switching API (as defined in the GES API Technical Specification) shall be available to Authorised Persons within 42 hours of an update being accepted and processed in UK Link~~from the relevant Shipper~~; and
>
> (b) data not required within the Supply Point Switching API (as defined in the GES API Technical Specification) having been accepted and processed by UK Link~~the CDSP~~ before 04:00 hours shall be available to Authorised Persons by 09:00 hours on the same day.

REC Schedule 1 – Interpretations and Definitions will also be amended to include a definition of UK Link:

UK Link	Has the meaning given to it under the UNC.

8 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0277 can be found here.

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PRELIMINARY ASSESSMENT

9 BUSINESS CASE ASSESSMENT

9.1 COSTS

There are no costs associated with this Change Proposal.

9.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
IMPROVED ALIGNMENT OF PERFORMANCE LEVELS WITH OPERATIONAL CAPABILITY	The current Performance Levels were introduced with the CSS programme in 2022 and does not reflect system capability or industry demands. Additionally, the CDSP is not currently meeting these Performance Levels. Introducing a timescale for the acceptance and processing of data through UK Link will lead to improved alignment of Performance Levels with the system and service performance.
IMPROVED CLARITY ON PERFORMANCE LEVEL SLAS FOR GES USERS	The implementation of this Change Proposal will remove ambiguity around the process time for data transferring through UK Link and into the GES platform, providing clarity on the Performance Level SLAs for GES Users. The current wording of the GES Service Definition has led to confusion around whether the 2-hour SLA includes the acceptance *and* processing of the data. This Change Proposal will introduce a longer 4-hour SLA and clarify this is for the acceptance and processing of data in UK Link before it is made available to GES Users.

9.3 COST BENEFIT ANALYSIS

There are no central systems costs, no expected costs to Parties and two intangible benefits associated with this Change Proposal. As such, the Code Manager believes that there is a positive case for change.

10 CASE FOR CHANGE

The Code Manager considers there is a positive case for change for implementing this Change Proposal on the basis that the proposed solution:

- Is both viable and implementable, and effectively resolves the problem statement;
- Has no associated central system costs and no associated Party costs;
- Has proportionate effort required for implementation;
- Should allow for improved alignment of Performance Levels with operational capability of the GES service; and
- Will provide improved clarity on performance level SLAs for GES Users.

11 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link

12 GLOSSARY

TERM	DEFINITION
Authorised Person	means, in respect of each REC Service User, one of its employees, agents, consultants or contractors.
Central Data Service Provider (CDSP)	means the 'Central Data Service Provider' appointed by Gas Transporters pursuant to standard special condition A15 (Central Data Service Provider) of the Gas Transporter Licences.
Central Switching Service (CSS)	means the Systems and processes provided or procured by the CSS Provider for the purpose of providing the Address Management Service and the Registration 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.
Gas Enquiry Service Provider (GES Provider)	means the provider of the Gas Enquiry Service.
Gas Enquiry Service User (GES User)	means a Party or Non-Party REC Service User which is entitled to use the GES under the Data Access Schedule.
Performance Level	means the performance level required under the Performance Assurance Schedule.