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Reference	RECPAB_26_2909_04 - Delaying the Start of Derogation Requests to Use Robotics on the Secure Data Exchange Portal (SDEP)
Status	For decision
Pages	4

Retail Energy Code Performance Assurance Board Paper

Delaying the Start of Derogation Requests to Use Robotics on the Secure Data Exchange Portal (SDEP)

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For decision	This paper requests that the PAB delay the start date of the Derogation. The derogations previously approved for EDF Energy Customers Ltd (approved on 22nd November 2025) and OVO (approved on 27 May 2025), both relating to the use of robotic agents on the SDEP. Due to delays in implementing including R0122 (SDEP Review Improvements (2) – Usability), there has been a delay to upgrading the SDEP to facilitate the use of robotics, which is why we are requesting this delay start. Section 1 covers the background to the EDF and OVO robotics sandboxes, the reasons for the current delay (linked to R0122 (SDEP Review Improvements (2) - Usability)), and the risks associated with this derogation. In Section 2, the Code Manager presents the derogation being requested. Section 3 sets out the Code Manager's recommendation. The Code Manager recommends that the REC Performance Assurance Board (PAB): **APPROVES –** to delay the start of the derogation, to give OVO and EDF time to implement their solution. **NOTES** that a longer-term, machine-to-machine solution is likely to be needed, and that R0161 - Enabling Robotics for SDEP will progress once R0122 (SDEP Review Improvements (2) - Usability) has been delivered.

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Appendices	None

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1.1 Background

- Robotic process automation (robotics) is a type of software that allows computers to interact with Graphical User Interfaces (GUIs) and is often used to automate repetitive tasks. By reducing manual intervention, robotics can improve efficiency, reduce errors, and free up resources for value-added activities.
- The sandbox applications for EDF and OVO have both been previously approved by PAB. Both OVO and EDF's sandbox applications were to use robotics on the Secure Data Exchange Portal (SDEP), the secure mailbox Suppliers use to send and receive queries and escalations.
- As part of assessing the sandbox applications, it was identified that to facilitate robotics on the SDEP whilst reducing the risk to other users of the system, two changes to the SDEP system would be needed, namely:
- **System monitoring** needs to be in place. This will allow the system to be monitored to identify performance issues which could impact on other SDEP users (for e.g. slow page loading).

    a. **Enabling suspension of access to the SDEP.** This would allow robotics to be stopped by the SDEP provider if they were suspected of causing a performance issue.

- It was decided that R0122 (SDEP Review Improvements (2) – Usability) should be delivered first, followed by the system upgrades. Then with those upgrades in place to reduce risk to other users, robotics can be permitted. R0161 – Enabling Robotics for SDEP would then be progressed, with evidence gathered from Ovo and EDF's use of robotics, feeding into this CP.
- However, following approval of the sandbox applications, R0122 has been delayed and is now expected to continue until 14 June 2027. This has, in turn, delayed the implementation of the system upgrades to facilitate robotics. The Code Manager is in discussions with the SDEP Provider to confirm updated timelines for the upgrades to facilitate robotics. With timescales pushed back, a delayed start to the OVO and EDF derogations is sought.

1.2 Derogation Request

This request aligns with previous sandbox approvals for EDF and OVO and seeks approval to postpone the start date of the existing Derogations until the trial is ready to commence.

1.3 Code Manager's recommendation

The Code Manager recommends that the PAB approves postponing the effective date of the derogations, to give OVO and EDF time to implement their solution following the upgrades to the SDEP to facilitate robotics.

REC PAB Decision
• The Code Manager recommends REC PAB to: • **APPROVE** postponing the effective date of the derogations for EDF Energy Customers Ltd and OVO, until the trial is ready to commences after the delivery of R0122. • **NOTE** that a longer-term, machine-to-machine solution is likely to be needed, and that R0161 - Enabling Robotics for SDEP will progress once R0122 (SDEP Review Improvements (2) - Usability) has been delivered.

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