RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	Final Recommendation

CHANGE REPORT

I0186 – NON DUAL-FUEL GAS PSR CONSUMER

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	TBC
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	CHANGE PANEL	CHANGE PATH	SELF-GOVERNANCE
PRIORITY STATUS	MEDIUM	URGENCY	STANDARD
IMPACTED STAKEHOLDERS	CONSUMERS, ENERGY SUPPLIERS, DISTRIBUTION NETWORK OPERATORS, GAS TRANSPORTERS		

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OVERVIEW

Consumers who receive gas and electricity from two different Energy Suppliers are often faced with difficulties when adding both supplies to the Priority Services Register (PSR). This Issue has therefore been raised to facilitate the sharing of PSR data between Energy Suppliers for dual-fuel Consumers.

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BACKGROUND

1 SUMMARY

The Priority Services Register (PSR) is a vital industry process in protecting Vulnerable Consumers and offering them additional support with their energy supplier, where needed. Within the REC, Vulnerable Consumers are described as Domestic Consumers who due to their Personal Characteristics or Circumstance, or otherwise being in a Vulnerable situation, may require Priority Services or additional support. In which context, Personal Characteristics or Circumstance include the Domestic Consumer being of Pensionable Age; or the Domestic Consumer being chronically sick, or having an impairment, disability, long term medical condition, or severe financial insecurity.

The majority of Domestic Consumers in the UK are referred to as 'dual-fuel' - this means that a Domestic Consumer receives both gas and electricity from the same Energy Supplier. This 'dual-fuel' position has supported the industry improvements to PSR data flows by allowing previous split data to be overstepped in terms of data flows between energy types.

There is a problem which this Issue aims to resolve, where a Consumer who has both fuel types, and two Energy Suppliers must contact both Energy Suppliers if they wish to register upon the PSR. This was always a 'known' gap shared with Ofgem when the many improvements were implemented across the PSR and considered to be something that would be addressed at a later date.

This 'gap' means that currently without the dual-fuel link data flows do not complete across energy types via the Energy Supplier data flow triggers. It has always been known that when sizing the scale of this gap, non-dual-fuel Consumers make up less than 10% of all domestic households and of those, many only use one fuel type and only have an electricity supply connected to their property. Not all these Consumers will need to be on the PSR, but those that do need to be registered, need to be captured/shared using existing two-way data flows and standard processes.

This Issue has been raised to rectify this 'gap' and allow a Consumer (no matter at which point they register i.e. with their Gas Supplier, Electricity Supplier or a network) to have their PSR data flows across all participants through current and future data sharing mechanisms.

2 PROBLEM STATEMENT

There is a gap in the standardised processes for sharing PSR information across and between industries e.g. gas, water, electricity. Consequently, Consumers who receive gas and electricity from two separate Energy Suppliers are often faced with difficulties should they wish to be added to the PSR, as their data may not be shared between their two separate Energy Suppliers. The result is that some Vulnerable Consumers are not being recognised as being part of the PSR and in turn being eligible for priority services or having to contact both Energy Suppliers to ensure they are registered on the PSR for both their gas and electricity supply. This

creates a risk that a Vulnerable Consumer may not be known to/identified by their Energy Supplier who in turn are not able to provide the Consumer with the appropriate priority services or update the Distribution Network Operator or Gas Transporter.

In particular, where the Consumer does not hold a dual fuel contract with their Electricity Supplier, the PSR data does not reach the Gas Supplier and therefore is not updated within Gas Central Systems. The Gas Supplier therefore cannot identify a Consumer requiring additional support as they are displayed as 'not registered' and vice versa.

3 IMPACTS

CONSUMERS
Domestic Credit
Domestic Prepayment

REC SERVICE PROVIDERS
Gas Retail Data Service (GRDS)
Electricity Retail Data Service (ERDS)

RECCO / REC CODE MANAGER
REC Performance Assurance

REC PARTIES AND SERVICE USERS
Energy Suppliers
Distribution Network Operators (DNOs)
Gas Transporters (GTs)

REC DOCUMENTS / PRODUCTS	
REC Main Body	Schedule 23 – Registration Services
Schedule 11 – Prepayment Arrangements	Schedule 28 – Related Metering Points
Schedule 13 – Transfer of Consumer Data	Schedule 24 – Switching Data Management
Schedule 26 – Switching Service Management	Data Item Catalogue and Market Message Catalogue

3.1 MARKET-WIDE HALF HOURLY SETTLEMENT (MHHS) IMPACTS

MHHS DESIGN
No Design Impact.

MHHS DATA SPECIFICATION
Dependent upon the solution and whether new Scenario Variants are added.

MHHS CODE DRAFTING
Potential impacts to Schedules 23, 24, 26 and 28.

The impacts on MHHS are dependent upon the solution developed as this Issue progresses. At this stage, this Issue is not expected to impact the MHHS design since the transfer of PSR data processes, under Schedule 13 – Transfer of Consumer Data, are not included in the scope of MHHS. However, sharing PSR data is included in the process.

There may be an impact on the MHHS Data Specification. This will be dependent upon the solution, however, although the D0225 structure is not impacted, new scenario variants are being added to the Market Message for Advanced and Smart Data Services and Metering

Services, which are the Supplier Agent industry parties under MHHS. Any changes required for this Issue will impact existing Supplier Agents and any future MHHS changes and should also be considered.

If this Issue results in required changes to the ERDS, there could be impacts to what is being tested for Qualification. The Code Manager will engage with the Performance Assurance MHHS Qualification team during solution development to assess this.

4 CROSS-CODE IMPACTS

This Issue is expected to have cross-code impacts, particularly in the gas PSR technical solution as set out in UK Link. The Code Manager will engage with the Cross-Code Steering Group (CCSG) throughout the solution development process.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**14 Jan-25**	**31 Aug-25**
	Solution Analysis	January	April
	Solution Development	April	August

6 STAKEHOLDER ENGAGEMENT

Existing stakeholder engagement has taken place within the industry to explore known issues with the PSR that the Code Manager may be able to utilise to assist with the progression of this Issue. For example, a subgroup of the Safeguarding Consumer Working Group (SCWG) has been formed, represented by DNOs, Energy Suppliers and GTs. In previous engagement, DNOs have also expressed their concern and difficulty at the lack of standardised process or system for sharing PSR information across and between industry e.g. gas, water, electricity.

This Issue was also previously discussed at the Change Issues Group meeting on 4 July 2024. In this meeting the Issue was introduced and received support from members across the industry, including consumer representative groups, to proceed with all acknowledging the benefits that resolving this Issue would bring. The group was asked to consider a possible solution, but no solutions were proposed. It has been noted that a similar situation in managing the PSR within the water industry had occurred and had been resolved. As such, this may be something the Code Manager investigates to consider whether it is able to be replicated in the energy (gas) industry as part of the solution analysis.

There will be continued informal stakeholder engagement via upcoming meetings of the Change Issues Group. In these meetings, possible solution options will be presented for stakeholder feedback, questions, and suggestions. Upon the completion of the solution development, formal stakeholder engagement will take place through an issued Party impact assessment.

7 PRIORITY STATUS AND URGENCY

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	2	27	53
	Retail Markets Impact	Innovation and Market Arrangements	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	1	14	14
Resource	Complexity / Effort / Duration		1	9	9
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		2	17	17
	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	0	10	0
				Overall Priority Score (rounded)	148

Priority Status	MEDIUM
Change Proposal Type	STANDARD

This Issue has been classed as a standard Change Proposal type and has been given a medium priority status based upon a weighted prioritisation score of 148.

SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

In previous work conducted by RECCo and the Code Manager, Parties have also highlighted the following challenges with the PSR that may be included in the scope of this Issue as solution development progresses:

- Where the Consumer does not hold a dual fuel contract with their Electricity Supplier, the PSR data does not reach the Gas Supplier and therefore is not updated within Gas Central Systems. The Gas Supplier therefore cannot identify a Consumer requiring additional support as they are displayed as not registered (and vice versa).
- Difficulties in interpreting the severity of Consumer's vulnerabilities during an emergency.
- PSR 'need codes' are not always used in a standard way by difference organisations.
- Existing information can be replaced with incorrect information and/or incomplete provided by Energy Suppliers via the D0225.
- Lack of awareness on DNOs/Energy Suppliers relationship from the Consumer perspective.
- Little understanding and awareness of the GT roles by Consumers which may impact responses to communications by Vulnerable Consumers (i.e. they may think the GT communication is spam or unimportant).
- Lack of mandated or standard message format/mechanism, inability for iGTs to share PSR information updates directly with Xoserve.

9 PROPOSED SOLUTION

I0186 has been raised as an Issue and will undergo a period of solution development and analysis in line with the Proposal Plan presented in this Change Report. Therefore, there is no proposed solution at this stage. However, the following desired outcome to be included within the solution has been noted by the proposer:

“Non-dual-fuel Consumers, who register upon the PSR, will have their PSR data flow across energy industry data flows to mean that all parties are aware of any PSR needs codes, allowing us all to provide equal access to our services and support. This will be achieved via the utilisation of existing processes and systems. Initially a pilot will take place for a minimum of 3 months between participating companies before extending this to the whole industry”.

The Code Manager will explore the feasibility of this outcome (and pilot) once a solution has been developed.

10 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

No risks, assumptions, issues or dependencies have been identified at this stage.

11 APPENDIX

CHANGE PROPOSAL	Link

12 GLOSSARY

Term	Definition
Distribution Network Operators (DNO)	means a person holding an Electricity Distribution Licence.
Domestic Consumers	means a Consumer at Domestic Premises.
Electricity Retail Data Service (ERDS)	means the electricity registration services provided under this Code to support the provision of electricity retail data to the CSS and other services.
Electricity Supplier	means a person holding an Electricity Supply Licence.
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Gas Retail Data Service (GRDS)	means the gas registration services provided under this Code to support the provision of gas retail data to the CSS and other services.

Term	Definition
Gas Supplier	means a person holding a Gas Supply Licence.
Gas Transporter (GT)	means a person holding a Gas Transporter Licence which requires that person to become a Party to this Code.
Office of Gas and Electricity Markets (Ofgem)	Ofgem is the regulator for Britain's gas and electricity industries overseen by the Gas and Electricity Markets Authority (the Authority).
Priority Services Register (PSR)	Means the register of certain Domestic Consumers established and maintained by relevant Parties pursuant to their licence.
Market Message	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
Vulnerable	means a Domestic Consumer who due to their Personal Characteristics or Circumstance, or otherwise being in a vulnerable situation, may require Priority Services or additional support. In which context, Personal Characteristics or Circumstance include a) the Domestic Consumer being of Pensionable Age; or b) the Domestic Consumer being chronically sick, or having an impairment, disability, long term medical condition (including a visual, auditory, literacy or mobility impairment), or severe financial insecurity (such that they are unable to safeguard their personal welfare or the personal welfare or other members of the household). "Vulnerable Consumer", "Vulnerability", "Vulnerable Situation" and other cognate expressions shall be construed accordingly.