RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	Final Recommendation

CHANGE REPORT

I0262 – ADDITIONAL REGISTRATION DATA (GAS) UNDER THE SMART ENERGY CODE

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	TBD
IMPLEMENTATION APPROACH	TBD

RESPONSIBLE COMMITTEE	Technical Expert Panel	CHANGE PATH	Authority Determined
PRIORITY STATUS	Low	URGENCY	Standard
IMPACTED STAKEHOLDERS	Gas Transporters, DCC		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	ASSURANCE LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

Gas Transporters (GTs) only have a single explicit obligation in the Smart Energy Code (SEC). This obligation relates to the provision of Registration Data to the DCC. This issue is exploring whether these obligations may be transferred to the REC.

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BACKGROUND

1 SUMMARY

Under the Smart Energy Code (SEC), the Data Communications Company (DCC) are entitled to receive 'Registration Data' to allow them to assess whether Users are eligible for certain services, or for the calculation of charges owed by Users. In the REC, the DCC currently function as the Central Switching Service (CSS) Provider – The SEC permits for the DCC to access Registration Data from the CSS Provider, i.e. from their role within the REC.

SEC Section E – 'Registration Data', details the arrangements (as per the above) by which the DCC are able to procure this data for the purposes of their role within the SEC via their role as the CSS Provider within the REC. Clause E2.2 covers the standard arrangement by which the DCC accesses Registration Data under the SEC. However, Clauses E.5.3 and E5.4 make arrangements for the provisional of Additional Registration Data, sent to the DCC by Gas Transporters (GTs) (via Xoserve as an intermediary acting on behalf of GTs), rather than via the CSS Provider. Additional Registration Data is provided by GTs to the DCC on a monthly basis. The data provided is as follows:

> *E5.3 Each Gas Network Party shall with effect from calendar month October 2020 provide (or procure that its Registration Data Provider provides) to the DCC by no later than the last day of each calendar month (the 'relevant calendar month') the data referred to in Section E5.4 in respect of each Gas Supplier Party.*
>
> *E5.4 The data to be provided to the DCC by the Gas Network Party in accordance with Section E5.3 is the number of Supply Meter Points on its network that relate to Designated Premises at which:*
> *(a) the Gas Supplier Party is Registered on the 15th day of the relevant calendar month; and*
> *(b) the quantity of gas supplied to the premises is measured by a Gas Meter that is an Advanced Meter,*

The Proposer, a GT, and Party to both the REC and the SEC, has identified that SEC Clauses E5.3 and E5.4 are the direct obligations for GT within the Smart Energy Code. The Proposer has suggested that these obligations may more naturally sit within the REC, as the gas Additional Registration Data relates to data that is owned by the REC. As such, the Proposer has asked that the Code Manager explore how the REC may instead absorb the SEC E5.3 and E5.4 obligations, contingent on a SEC Modification to release them.

At the time of publication, the SEC Modification has progressed to such an extent as to have determined that it is likely that the SEC may release these obligations. As such, this Issue now seeks to explore how the REC may integrate these obligations, in a way that will provide continuity to the DCC, and delivery of the required Data in a way that is consistent with how it is currently delivered within the SEC.

2 PROBLEM STATEMENT

Gas Transporters (GTs) have very few obligations under the Smart Energy Code; those that they do have relate to provision of data owned by the REC. If these obligations were to be moved from the SEC to the REC, then the regulatory burden on GTs may be reduced as they would be able to completely secede from the SEC.

3 IMPACTS

CONSUMERS
None

REC SERVICE PROVIDERS
DCC

RECCO / REC CODE MANAGER
None

REC PARTIES AND SERVICE USERS
Gas Transporters

REC DOCUMENTS / PRODUCTS
TBD

MHHS
None

The Code Manager has not identified any Consumer impact.

The Code Manager has named the DCC as an impacted Service Provider. However, there will be no direct impact, as the DCC is not expected to have to modify any of its processes in respect of any of it's roles within the REC. Rather, they have been identified as the successful delivery of the proposed solution.

GTs have been identified as the proposed solution will result in new obligations for them under the REC.

4 CROSS-CODE IMPACTS

This is a cross-code Issue, where the associated SEC Modification is MP301. The REC was confirmed to be the lead code by the Cross-Code Steering Group. There has been a unified approach to the development of both the REC Issue and the SEC Modification. The SEC Modification was developed first to ensure that the obligations were able to leave the SEC, and then, once confirmed, the REC Issue is now to be progressed, to determine if the REC may gain the obligations.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**21 Oct 25**	**19 Jan 26**
	Solution Development	October	October
	Legal Review	October	November
	Impact Assessment	November	November
Change Proposal		**20 Jan 26**	**02 Mar 26**
	Business Case Assessment	January	January
	Consultation	January	February
	Solution Refinement	February	March
	Final Determination	March	March
Voting		**03 Mar 26**	**03 Mar 26**
	Appeal Window	March	March

The Change Proposal Plan has been drafted so that key events such as the impact assessment and consultation coincide with their analogous events in the associated SEC Modification. No activity is planned over December 25, to accommodate governance steps in the SEC Modification.

6 STAKEHOLDER ENGAGEMENT

The Code Manager does not expect to engage with industry forums such as the Change Issues Group at the time of publication due to the limited broader impact of the proposed solution on the REC, but reserves the right to do so should developments require it.

7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	0	27	0
	Retail Markets Impact	Innovation and Market Arrangements	0	17	0
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		2	9	18
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	1	10	10
		Overall Priority Score (rounded)			87
		Priority Status			LOW
		Change Proposal Type			STANDARD

Priority Score	Priority Status
171 and above	Critical
151 to 170	High
101 to 150	Medium
0 to 100	Low

Urgent Change Proposals meet the Criteria for Urgency as set out by Ofgem

This Issue has been given a priority status of Low, based on a score of 87. This score has been calculated as follows:

- Operational Effectiveness & Efficiency for REC Parties has been given a score of two, indicating moderate impact. This is because successful delivery of the proposed solution for both the REC Issue and the SEC Modification will result in GTs leaving the SEC. This will result in a reduction in their operational and regulatory burden as they will no longer need to deploy resources in support of obligations associated with accession to the SEC. These resources may then be deployed more efficiently in their organisation.
- Legal & Regulatory Compliance has been given a score of two, indicating moderate impact. This is because the successful delivery of the proposed solution for both the REC Issue and SEC Modification will result in a streamlining of obligations for a major class of industry Party across multiple Codes.
- Complexity has been given a score of two, indicating moderate complexity. This is indicative of the challenges resulting from co-ordination of progression between the REC Issue and the SEC Modification.

All other metrics have been given a score of zero or one, as appropriate.

8 APPENDIX

CHANGE PROPOSAL	Link
RELATED CHANGE(S)	SEC Modification MP301

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9 GLOSSARY

TERM	DEFINITION
CSS Provider	means the DCC when performing functions under or in relation to this Code (but always excluding its functions under the Smart Energy Code and its roles as CSS Systems Integrator, SI Provider and Switching Operator), including in respect of the Central Switching Service and including in effecting the design, build and testing of any System that will allow it to perform functions under this Code after the CSS Go-Live Date. This role is the CSS Procurer and Manager function as described in the E2E Data Migration Plan, E2E Integration Plan, E2E Post Implementation Plan, E2E Testing Plan, E2E Transition Plan: Implementation Approach and E2E Transition Plan: In-Flight Switches Approach.
Gas Transporter	means a person holding a Gas Transporter Licence which requires that person to become a Party to this Code.
Registration	means the record in the Central Switching Service for each RMP identifying each Energy Supplier which is registered in respect of that RMP, and the Registration Status of each such registration.
Registration Data	means the data recorded in relation to a Registration
Smart Energy Code	means the code of that name maintained pursuant to the DCC Licence.