RETAIL ENERGY CODE

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01	Initial Assessment Report
02	Preliminary Change Report
03	Final Change Report

CHANGE REPORT

R0009 – INTRODUCTION OF SDEP AND EES USER MAINTENANCE API

CHANGE REPORT	PRELIMINARY
DOCUMENT VERSION	1.0
ISSUED DATE	16/09/2022
DOCUMENT APPROVAL STATUS	NOT YET APPROVED

RESPONSIBLE COMMITTEE	TECHNICAL EXPERT PANEL	CHANGE PATH	SELF GOVERNANCE
PRIORITY STATUS	LOW	URGENCY	STANDARD

DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	16/09/2022

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CHANGE OVERVIEW

This Change Proposal is to introduce an Application Programming Interface (API) interface to allow:

- SDEP Users to send/receive/respond automatically to messages through the Secure Data Exchange Portal (SDEP)
- EES and Secure Data Exchange Service (SDES) Users to carry out automated Electricity Enquiry Service (EES) Authorised Person Maintenance

	High Impact: N/A
	Medium Impact: N/A
	Low Impact: Domestic Energy Suppliers. Distribution Network Operators. Non-Domestic Electricity Suppliers. Electricity Metering Equipment Managers. Electricity Enquiry Service Users.

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0009 is **REJECTED** for implementation on 30 June 2023.

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BACKGROUND

1 BACKGROUND

Secure Data Exchange Portal

The Secure Data Exchange Portal (SDEP) a module of the Electricity Enquiry Service (EES) was introduced in August 2020. It is an online secure platform which allows a standardised way of communicating between Retail Energy Code (REC) Parties when resolving missing or disputed data, escalations and other queries. The REC requires Energy Suppliers and Distribution Network Operators to use the SDEP when sending operational queries and escalations across the industry. On average over 90,000 messages are sent using the SDEP each month.

Prior to the introduction of the SDEP, email was the main form of communication between industry parties for the sharing of data. Several parties developed automated solutions to manage the sending and response to emails as part of their operational processes, however, the SDEP itself does not currently have this functionality. This means industry parties that were previously able to automate their processes fully or partially are no longer able to do so. Each action to raise or reply to a communication must be done manually.

Electricity Enquiry Service

In the Electricity Enquiry Service (EES) a Master Administration User (MAU) or other Authorised Persons with 'User Maintenance' permissions assigned to them can create, delete, and manage permissions for other users manually through the Graphical User Interface (GUI). In scenarios where changes need to be made to a large volume of user accounts, there is no mechanism to manage these in bulk. This has caused issues when setting up user permissions for the SDEP (which need to be set up individually for each user, message, and Market Participant Role), and managing mass changes to user accounts (such as changes to email domains, transfer of MPIDs, or large volumes of new users or leavers).

2 PROBLEM STATEMENT

It is not possible to automate the sending and receiving messages through the SDEP.

It is also not possible to manage Authorised Person's permissions in the EES and SDES in bulk where there is a high volume of changes required.

This requires processes to be managed manually by an Authorised Person and doesn't allow EES and SDES Users to develop more efficient ways of working.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As a Consumer, I want to ensure the data held by my Energy Supplier and other industry parties is correct so that I receive accurate and timely bills so that I understand what I need to pay and by when with no surprises.
C2	As a Consumer, I want to be able to Switch to a new Energy Supplier without experiencing significant delays whilst my new and old supplier resolve any issues. So that I can see the benefits of switching at the earliest opportunity.
MARKET PARTICIPANT USER STORIES	
M1	As an SDEP User, I want to be able to automate processes that use the SDEP, so I can meet my obligations as efficiently and effectively as possible.
M2	As an EES or SDES User, I want to be able to automate certain user maintenance requests, so I can manage user maintenance activities as efficiently as possible.

PROPOSAL

4 SUMMARY OF ANALYSIS UNDERTAKEN

A period of analysis was undertaken to understand the user requirements and use case for the API. During this phase the Code Manager identified the underlying factors causing constraints with the systems, to ensure it was clear what issues needed to be addressed as part of the proposed solution.

Prior to the REC, these changes had been explored under the Master Registration Agreement (MRA), resulting in a draft API Technical Specification being produced, however, the change was not progressed at that time due to the transition to the REC. As part of the initial analysis activity, the Technical Specification was reviewed with both the Service Providers and the Proposer. Outstanding design areas were identified that needed to be addressed during the solution development activity.

5 PROPOSED SOLUTION

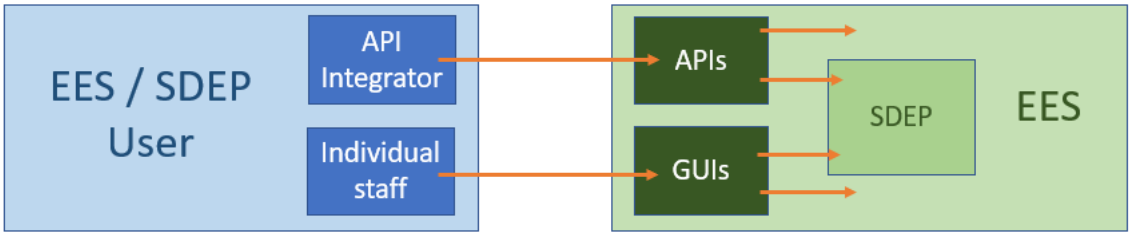
The API

The proposed changes to the API would allow machine to machine access to the EES and SDEP for certain tasks, instead of individual users completing manual actions. The user would create a request within their own system to receive and/or update information via the API, subject to the necessary validation. Users could also draw information (e.g. SDEP messages they had received) out via the API.

This would enable activities to be carried out 'in bulk' whilst still registering as individual actions within the EES / SDEP, to retain visibility and an audit trail. The solution would also facilitate attachments being submitted for SDEP communications.

Party access to the API

Users would need to develop their own systems to connect to the API. Technical Specification documentation would be provided to support development work, along with guidance on how to use it.



Using the GUI

As part of this Change Proposal we also explored the introduction of enhanced user interaction with the EES and SDEP via the GUI. Screens would be added to the GUI so data could be loaded via a spreadsheet (with the necessary validation within the EES and the SDEP). As with the API, this would allow 'bulk' updates, though the changes would be recorded as individual actions within the systems.

It should be noted that only one Party positively responded that they would use this functionality in the Party Impact Assessment.

Relevant SDEP / EES actions

In summary, the following actions could be undertaken through the API / GUI (for full details, see requirements in Appendix 2):

- New/Updates to Authorised Persons' details in both EES and SDEP
- Raising New communications - SDEP
- New messages (e.g. responses to queries raised) within communications, sending and receiving – SDEP

SDEP Changes to working processes

The SDEP records allow for either an electricity Meter Point Administration Number (MPAN) or a gas Meter Point Reference Number (MPRN) to be identified per communication, plus a few additional MPANs or MPRNs if added as tags. These MPANs or MPRNs are searchable in the system. Users may also include an attachment and we understand it is widespread practice to raise a single communication covering multiple MPANs or MPRNs that are listed in an attachment. The contents of attachments are not searchable and therefore it is not always possible to know if an MPANs or MPRNs has an associated SDEP communication.

Instead of using an attached list of MPANs or MPRNs, having a bulk communication would allow the recording of a single communication per MPRN or MPAN. It would also allow users to search for and identify each and all MPANs or MPRNs subject to an SDEP communication.

SDEP users that don't use an API would therefore receive individual messages for each MPANs or MPRNs, which could result in some additional effort to review and process multiple messages.

The current functionality of the SDEP remains in place if the proposed API is implemented.

New/Updates to Authorised Persons – EES

In the Electricity Enquiry Service (EES) a Master Administration User (MAU) or other Authorised Persons with 'User Maintenance' permissions assigned to them can create, delete, and manage permissions for other users manually through the Graphical User Interface (GUI). Using the proposed API would allow the 'User Maintenance' of Authorised Persons accounts via an API call.

Progressing improvements to the SDEP

We note that there is currently an SDEP review in progress which is expected to be concluded and presented to the Responsible Committee by the end of November 2022. This review is considering potential improvements to the wider functionality of the portal. Therefore, there is an overlap with this Change Proposal as it is an additional SDEP improvement which would help facilitate some proposed changes under the SDEP Review - such as reporting requirements.

To provide a cost effective and efficient delivery and implementation of changes to the SDEP, we are intending to align the solutions from this Change Proposal and the SDEP review as soon and as fully as possible.

6 DRAFT LEGAL TEXT

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

The API Technical Specification will be created by the EES Provider during the design and build of the proposed solution, post approval of this Change Proposal. This will be made available to REC Parties during the Release Management Actives.

7 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

7.1 SERVICE PROVIDER IMPACT ASSESSMENTS

The Electricity Enquiry Service (EES) Provider (the SDEP is a module of the EES) was asked to impact assess the proposed solution.

EES / SDEP SERVICE PROVIDER (C&C)	There are some additional requirements in this REC Change Proposal, which the Service Provider recognised. Key points to note: • Clarified the API functionality would include a way for users to export raw data to create their own reporting on SDEP communications and activity

	• Clarified that transfer of MPIDs between Company Groups for SoLR events would continue to be done via script not an API solution • There is not any forecast available of expected volumes of messages sent via an API. Whilst there is no reason that has been identified for the number of events requiring an SDEP communication to change due to the introduction of an API, some users' behaviour might change so that they choose to raise one call per MPANs or MPRNs rather than batching (up to several hundred) MPANs or MPRNs into the same SDEP communication. • There are SDEP changes being developed as part of the SDEP Review, some of which may impact the API. • The SDEP solution would be able to support sending attachments (managed through a dedicated API) • A "Swagger Connection" would be provided for users to develop their API integrations against, along with supporting documentation. But no specific training is planned at this stage Timescales: • Approximately 7 months would be required from Change Proposal (CP) approval to delivery of the solution for User Interface Testing. Costs including bulk upload GUI function • Design, development, build, testing & implementation costs - £397,220 o Plus ongoing annual operational costs - £40,000 Costs excluding bulk upload GUI function • Design, development, build, testing & implementation costs - £329,586 o Plus ongoing annual operational costs - £40,000

7.2 REC PARTY IMPACT ASSESSMENTS

A Party Impact Assessment was published by the Code Manager on 13 May 2022, inviting REC Parties to provide their responses by 15 June 2022. Eight responses were received from Parties, five from Energy Suppliers and three from Distribution Network Operators. The responses received are contained in the consolidated impact assessment responses document here.

ENERGY SUPPLIERS	• Four of the five Energy Suppliers agreed with the proposed solution and agree it addresses the problem statement. • Four of the five Energy Suppliers agreed the proposed solution should be implemented.

	• Four of the five Energy Suppliers said they'd make use of the proposed solution if it was implemented. • Three of the five Energy Supplier believe they would save on resources and processing time if the API was implemented. • A range of between 1-12 month implementation time would be required. • Three of the five Energy Suppliers stated they either would not use/or could not provide confirmation that they would use the GUI bulk upload function if it was implemented. • No costs to implement were indicated from any of the five Energy Suppliers, despite being asked.

DISTRIBUTION NETWORK OPERATORS	All the responding DNOs: • agreed with the proposed solution and agree it addresses the problem statement. • agreed the proposed solution should be implemented. • stated currently they would not utilise the proposed API solution if it was implemented. • would not anticipate using the GUI bulk upload functionality at this point, if it was implemented. • agree there would be a benefit to the industry by implementing the proposed solution.

8 DELIVERY AGAINST CHANGE PROPOSAL PLAN

To date all activity has been completed within the planned timescales.

The Change Proposal Plan can be found here

9 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

9.1 RISKS AND ISSUES

No.	RISK	NOTES	MITIGATION
R1	Change Proposal R0004 results in a conflicting solution	The solution for Change Proposal R0004 may impact EES functionality being updated as part of this Change Proposal, causing a design and/or development conflict. Any changes to permissions or creation of new Authorised Person's would need to be factored into the design of the API	R0004 was withdrawn by the proposer. Therefore the risk no longer exists.

No issues have been identified that would affect the progression of the Change Proposal.

9.2 ASSUMPTIONS AND DEPENDENCIES

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A1	Service Providers will be able to complete the Impact Assessment in line with the Change Proposal Plan	The Code Manager will work with Service Providers impacted by any identified solutions	Assumption identified during the Initial Assessment. This has now been validated through the Analysis and Solution Development phase
A3	Engagement may also be needed with the wider EES and/or SDEP users	The Code Manager will work with EES and/or SDEP users impacted by any identified solutions	Assumption identified during the Initial Assessment. This has now been Validated through the Analysis and Solution Development phase

No.	DEPENDENCY	NOTES	STATUS
D1	Service Provider Impact Assessment	The Code Manager will work with the EES and SDES Service Provider to complete any Impact Assessment according to Change Proposal Plan timeline	Closed
D2	SDEP Review	Whilst the SDEP Review draft recommendations are not proposing any changes that would conflict with an API, the API would need to reflect/account for any changes to the information contained in the SDEP	Open

10 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	30/06/2023

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

11 BUSINESS CASE ASSESSMENT

11.1 COSTS

	DESIGN, DEVELOPMENT, BUILD, TESTING & IMPLEMENTATION COSTS	ANNUAL SUPPORT/MAINTENANCE COSTS
SERVICE PROVIDER	£329,586 - £397,220	£40k PER ANNUM

No Party costs were provided as part of the Impact Assessment activity carried out by the Code Manager, despite being asked.

Although EES users will need to subscribe to access the new API functionality there will be no impact to service plan terms.

11.2 BENEFITS

The Code Manager is not able to adequately quantify the potentials benefits of this Change due to the limited number of responses to the Party Impact Assessment and the lack of tangible benefits identified by respondents. However, the Code Manager believes the change would bring about the following intangible benefits.

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
OPERATIONAL EFFICIENCY	Making an API available for use with the EES and the SDEP will improve operational efficiency and reduce FTE for those organisations utilising the new functionality.
SYSTEM INTEGRATION	Having the SDEP API allows integration with industry's core systems and will enable embedding this service into the industry more successfully.

11.3 COST BENEFIT ANALYSIS SUMMARY

Overall, the Code Manager doesn't believe the intangible benefits are sufficient to justify the implementation of the Change Proposal, which would incur significant cost, as set out in section 11.1.

This minded-to position is based on the limited detail provided by REC Parties in their responses to the Party Impact Assessment.

The Code Manager will attempt to secure further tangible benefits from REC Parties through the consultation process, to support the case for change.

12 CASE FOR CHANGE

At this time the Code Manager considers that there is not a positive case for change to implement this Change Proposal, on the basis that although the proposed solution resolves the problem, the tangible benefits identified do not reasonably outweigh the cost of solution.

13 CODE MANAGER'S RECOMMENDATION

The Code Manager recommends that the Technical Expert Panel reject Change Proposal R0009.

14 CONSULTATION PLAN AND NEXT STEPS

The consultation on this Preliminary Change Report will be published on the REC Portal on **30 September 2022**. Consultation closes on **21 October 2022**. As part of the Consultation, Parties will be asked to provide any potential tangible benefits expected to be achieved, to support the Code Manager's re-evaluation of the cost benefit analysis and the current position on the case for change.

Following consultation, the Code Manager will produce an updated version of this Preliminary Change Report (referred to as the Final Change Report). This will include the outcome of the consultation, setting out a summary of the responses received and the Code Manager's response.

The Final Change Report will be issued to Technical Expert Panel to make its determination.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
APPENDIX 2 – R0009 REQUIREMENTS	Link

RETAIL ENERGY CODE

16 GLOSSARY

TERM	DEFINITION
Application Programming Interface (API)	means a service which allows EES Users to gather information from the service in a specified manner.
Authorised Person	As per the Interpretation Schedule means: in respect of each REC Service User, one of its employees, agents, consultants, or contractors. As per the Service Definition of the EES: refers to the individual representative of an EES User accessing the EES on behalf of the EES User.
Balancing and Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
Distribution Connection and Use of System Agreement (DCUSA)	means the agreement of that name maintained pursuant to the Electricity Distribution Licences.
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Electricity Enquiry Service (EES)	means the service described as such in the EES Service Definition.
Energy Market Data Specification	means the document of that name forming part of the Technical Specification.
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Market Participant Identifier (MPID)	means the unique identifier by which a Market Participant is identified.
Meter Equipment Manager (MEM)	means, as applicable, either: (a) for electricity, the Meter Operator Agent (as defined in the BSC) Appointed by an Electricity Supplier; or (b) for gas, the Meter Asset Manager (as defined in the UNC) Appointed by the Gas Supplier.
Retail Energy Code (REC)	means this Code, including its Schedules and the Technical Specification, maintained pursuant to the electricity supply licences granted under the Electricity Act 1989 and the gas supply licences granted under the Gas Act 1986, as such code is modified from time to time in accordance with its provisions.
Retail Energy Code Company (RECCo)	The Retail Energy Code Company means the company established under Clause 5 of the main body of this Code.
Secure Data Exchange Service (SDES)	means the service described in the SDES Service Definition
Secure Data Exchange Portal (SDEP)	means the portal of that name which forms part of the Secure Data Exchange Service.

Swagger Connection	is a library of information such as message schemas, that can be referenced so that potential users can design their API connections. It will list the messages, allowable values, responses, error codes, and routes that can be used to connect to the API
Working Day (WD)	means any day other than a Saturday, a Sunday, Christmas Day, Good Friday, or a day that is a bank holiday in either or both England and Wales within the meaning of the Banking and Financial Dealings Act 1971.