RETAIL ENERGY CODE

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| 01 | Proposal Plan |
|---|---|
| 02 | Impact Assessment |
| 03 | Consultation |
| 04 | Final Recommendation |

# CHANGE REPORT

## I0218 – PROPOSAL TO ENABLE BROADER USE OF RETAIL ENERGY LOCATION (REL) DATA FOR NON-SWITCHING APPLICATIONS

| | |
|---|---|
| **DOCUMENT VERSION** | V1.0 |
| **PROPOSED IMPLEMENTATION DATE** | TBD |
| **IMPLEMENTATION APPROACH** | BIG BANG |

| | | | |
|---|---|---|---|
| **RESPONSIBLE COMMITTEE** | TECHNICAL EXPERT PANEL | **CHANGE PATH** | SELF-GOVERNANCE |
| **PRIORITY STATUS** | MEDIUM | **URGENCY** | STANDARD |
| **IMPACTED STAKEHOLDERS** | ENERGY SUPPLIERS, METERING EQUIPMENT MANAGERS, DISTRIBUTION NETWORK OPERATORS, GAS TRANSPORTERS ENQUIRY SERVICES PROVIDERS AND USERS, RECCO | | |

| LEAD ANALYST (SOLUTION LEAD) | TECHNICAL LEAD | ASSURANCE LEAD |
|---|---|---|
| LUKE COYLE | ROSALIND TIMPERLEY | ANTON MODEN |
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### OVERVIEW

This change aims to allow the use of Retail Energy Location (REL) Data for Non-Switching Applications.

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# BACKGROUND

## 1 SUMMARY

REL Unique Property Reference Number (UPRN) confirms an accurate address and is a key data item for the industry. Control over the right to access UPRN data, is held by Ordinance Survey requiring a specific tier of licence.

The use cases for this data are relatively varied, but one example would be the Ofgem Heat Network Project. Ofgem noted that the current Heat Networks space is unregulated and aims to address this using UPRN data from the Enquiry Services. Despite holding all the necessary licenses from Ordnance Survey, UPRNs cannot be used outside of switching purposes as specified in the Address Management Schedule. One other use case was provided that would allow Suppliers to check that the UPRNs they hold align with the UPRNs held by the industry for the same MPXN. These are two potential use cases but do not represent an exhaustive list, and further use cases may exist that have not been identified.

Schedule 29 - Address Management paragraph 1.4 provides the only permitted usage for this data as being for switching purposes; stating: “REL Addresses are synchronised to the Electricity Enquiry Service (EES) and Gas Enquiry Service (GES) so that Switching Parties (including Price Comparison Websites) can raise enquiries against them for the purpose of enabling Switching, including for the purpose of design, development, testing, integration and live operational use. No REL Address information obtained via the Address Management Service may be displayed on public-facing websites unless it is the website of a Switching Party that is a Price Comparison Website, and with prior permission from Ordnance Survey.”

## 2 PROBLEM STATEMENT

The REC currently specifies that REL data can only be used for switching purposes and cannot be used in other use cases. This means that stakeholders, such as REC Parties, Ofgem, and Energy Consultants, have been unable to benefit from this data and therefore Consumers are unable to benefit from the full potential use of their data.

## 3 IMPACTS

| CONSUMERS |
|---|
| All Consumers |

| REC SERVICE PROVIDERS |
|---|
| GES Provider |
| EES Provider |

| RECCO / REC CODE MANAGER |
|---|
| RECCo |

| REC PARTIES AND SERVICE USERS |
|---|
| Energy Suppliers |

| REC DOCUMENTS / PRODUCTS |
|---|
| GES Service Definition |

| NON-REC PARTIES |
|---|
| Third Party Intermediaries |

| | | |
|---|---|---|
| Metering Equipment Managers | EES Service Definition | Government Departments and Local Authorities |
| Distribution Network Operators | Schedule 29 - Address Management | Ofgem |
| Shippers | | UK Police Force |
| Gas Transporters | | Energy Theft Tip-Off Service |
| | | Others (GES, EES users e.g. Energy Consultants, Citizens Advice) |

| MHHS DESIGN | MHHS DATA SPECIFICATION | MHHS CODE DRAFTING |
|---|---|---|
| No impact on MHHS Design. | No data specification. | No impact on MHHS Code Drafting. |

## 4 CROSS-CODE IMPACTS

No cross-code impacts have been identified.

## 5 PROPOSAL PLAN

| Milestone | Activity | From | To |
|---|---|---|---|
| **Definition** | | **05-Dec-24** | **30-Apr-25** |
| | Solution Development | December | April |

This Change Proposal Plan does not extend beyond solution analysis and development as a full understanding of the solution is required prior to the planning of impact assessment activity and subsequent change process actions.

## 6 STAKEHOLDER ENGAGEMENT

The Code Manager plans to work closely with Suppliers, other Enquiry Service Users, and any other interested Stakeholders to ensure that their views and operational requirements are represented and acknowledged during solution development. Additionally, the Code Manager plans to engage more widely with industry during the progression of this Issue, at forums including, but not limited to the Change Issues Group and/or the REC Issues Group.

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## 7 PRIORITY STATUS AND URGENCY

| Category | Significance / Resource impacts / Urgency | Further selection / breakdown | Score (0-3) | Weighting | Weighted Score |
|---|---|---|---|---|---|
| **Impacts** | Consumer Impact | Direct | 1 | 27 | 27 |
| | Retail Markets Impact | Innovation and Market Arrangements | 1 | 17 | 17 |
| | 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 | | 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 | | 2 | | 17 |
| **Urgency** *(The need to progress a change to meet a targeted date)* | | Other Planned Activity | 1 | 10 | 10 |
| | | | | **Overall Priority Score (rounded)** | 138 |

| | |
|---|---|
| **Priority Status** | MEDIUM |
| **Change Proposal Type** | STANDARD |

This Issue has been given a priority status of medium based upon a prioritisation score of 138. This score has been calculated as follows:

- The category 'RECCo/REC Party Operational Effectiveness and Efficiencies' has been given a score of two as REC Parties may be able to improve their processes and improve their ability to better locate consumers. The reason that this is not scored higher however, is that the full use case for REC Parties is not fully known at this point. Once this becomes more clearly understood, the score may be revised, though this will not change the overall Priority Status.
- The category 'RECCo/REC Party Legal and Regulatory Compliance' has been given a score of two as there are direct impacts on the compliance of REC Parties towards data protection regulations as a result of this change. This impact should not be very substantial however, so a score of three was felt to be inappropriate.
- The category 'Contribution to the objectives of the REC' has been given a score of two as it aligns with the objective of ensuring customer interests and data protection in the operation of the REC. This change aims to ensure that REC Parties are able to deliver better service for consumers whilst protecting their interests with reasonable data usage limitations. However, as this change may have limited direct impact on customers, the score of three was not deemed appropriate.
- The category 'Contribution to RECCo's Forward Work Plan' has been given a score of two as it aligns with the goal of 'data and digitalisation - data access' that aims to 'ensure organisations can ask for and have appropriate access to specific items based on their needs.' The reason this has not been given a score of three however is that the impact on most other themes is minimal.

All other scores have been ranked at zero or one, as appropriate.

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## SOLUTION

## 8 PROPOSED SOLUTION

RECCo in their role as the Proposer has provided a proposed solution that can be broken down as follows:

- Schedule 29 – Address Management, the Service Definition Documents for both the Electricity and Gas Enquiry Services, and any other relevant REC documents are updated to remove the restriction on REL Data that limits usage to switching purposes. The legal text in all cases will allow REL Data to be used both for current services and any future REC defined services. The changes must comply with Ordinance Survey's intellectual property rights and ensuring full transparency for end users.

Once this issue has completed the change process and if approved, the following steps will need to take place.

- RECCo acquire a single Address Base Core Licence from Ordinance Survey that would cover both to the EES and GES as well as their associated Service Providers. This would centralise the licencing obligations under one agreement and ensure Service Providers are covered without needing individual licences. Ordinance Survey have confirmed that this would be agreeable from initial discussions with the Proposer and provided a provisional costing of approximately £4,000 per year. This will need to be confirmed as the change progresses as it will be required for the business case determination
- Parties or non-REC Party users of EES / GES wishing to utilise REL Data for non-switching purposes must acquire the relevant AddressBase Premium license or Public Sector Geospatial Agreement (PSGA) from Ordinance Survey. This would ensure that they are acting in compliance with Ordinance Survey's intellectual property licencing rules, whilst allowing them full rights to the relevant data. Ordinance Survey has been consulted and has provided non-binding confirmation that such a set-up would be agreeable from initial discussions with the Proposer. This will need to be confirmed as the change processes as it will be required for the business case determination.

## 9 APPENDIX

| CHANGE PROPOSAL | Link |
|---|---|

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## 10 GLOSSARY

| TERM | DEFINITION |
|---|---|
| Approved Meter Installer (AMI) | means a Party which is approved (or which is seeking approval) as such under the Metering Accreditation Schedule, being the entity, which undertakes the installation, replacement, repair and maintenance of gas Metering Equipment. |
| Authority (GEMA) | means the Gas and Electricity Markets Authority as established under section 1 of the Utilities Act 2000. |
| Distribution Network Operators (DNO) | means the Gas and Electricity Markets Authority as established under section 1 of the Utilities Act 2000. |
| Electricity Enquiry Service (EES) | means the service described as such in the EES Service Definition. |
| Energy Theft Tip-Off Service (ETTOS) | is described in Annex 2 of the Energy Theft Reduction Schedule. |
| Enquiry Service Users | means each and every Party and Non-Party REC Service User that is (and remains) Qualified to use one or both of the Enquiry Services. |
| 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. |
| Meter Asset Provider (MAP) | means the person that makes the Metering Assets for an RMP available for use by the Registered Supplier and the Consumer. |
| Meter Equipment Manager (MEM) | means, as applicable, either: (a) for electricity, a Meter Operator Agent (MOA); or (b) for gas, a Meter Asset Manager (MAM). |
| Meter Operator Agent (MOA) | means a Party which has Qualified in that role under the Qualification and Maintenance Schedule. Where used in respect of a particular Metering Point, it means the MOA Appointed by an Electricity Supplier in accordance with the Metering Operations Schedule. The MOA is accountable for the installation, replacement, repair and maintenance of electricity Metering Equipment (either itself or by an EMO), and the MOA must also therefore be Accredited under the Metering Accreditation Schedule. |
| Price Comparison Websites | means operators of price comparison websites. |
| Retail Energy Location (REL) | means a Location to which Energy is delivered via an RMP, and/or from which electricity is exported via an RMP. |

| | |
|---|---|
| Third Party Intermediary (TPI) | means a broker or introducer acting between Consumers and Energy Suppliers, including Price Comparison Websites. |
| Unique Property Reference Number (UPRN) | means the number by which a property is identified in the GB Standardised Address List. |