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EES DATA ACCESS UPDATES FOR MHHS

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FOR DECISION	PAB Members are invited to take the following actions: • **AGREE** the with the Code Manager recommendation to approve the proposed alterations to the Electricity Enquiry Service Data Access Matrix which reflects the ISDP approach taken to the new and amended data items for MHHS; • **AGREE** with the Code Manager recommendation to approve the implementation date which will be that determined by the Authority in line with MHHS Programme milestone, M8 'Code changes delivered'.	
APPENDICES	Electricity Data Access Matrix v4.1 MHHS updates MHHS Consequential Change - EES Data Access v4.0 02.11.2023 MHHS Consequential Change - Data Access Matrix 26.04.23	

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1 BACKGROUND

The Market-wide Half Hourly Settlement (MHHS) design includes the Electricity Enquiry Service (EES) as a recipient for a number of new Data Integration Platform (DIP) interfaces. This enables the EES to source new MHHS data items and existing data items that will now be communicated via the DIP, without requiring additional integration with each Electricity Retail Data Agent (ERDA). Metering Points will be gradually migrated to the MHHS arrangements over a period of 12-18 months. The new MHHS data items will therefore be made available in relation to Metering Points as they are migrated to the new MHHS arrangements, with legacy data items remaining available for non-migrated Metering Points.

When the MHHS Code drafting activity commenced, the EES Data Access Matrix (DAM) was a REC Category 2 product and was under the scope of the MHHS Programme code drafting. Changes to the EES DAM covering the introduction of a new category of EES User and access to the new MHHS data items were discussed with the MHHS Programme's Consequential Change Impact Assessment Group (CCIAG) in December 2022 and issued for industry consultation on 21 February 2023.

The proposed changes regarding EES data access were then taken through REC governance under the REC MHHS Stakeholder Advisory Group (REC MSAG), which was set up to define solutions that are not detailed in, but are required by, the MHHS Design. This activity resulted in an agreed MHHS Consequential Change Solution to be taken forward into the code drafting.

Since this solution was agreed, the EES DAM has been changed to a Category 3 product following implementation of R0118 - Review of Schedule 12 and processes to manage access to data on 06 December 2023. As a result, the EES DAM was not progressed under the main MHHS code drafting that was baselined at MHHS Milestone M6. It is now being progressed through the new data access Category 3 process .

2 THE ROLE OF THE PAB

PAB are responsible for specifying REC Party, Non-Party REC Service User and REC Service Provider security and data protection requirements under the REC. One area for consideration is whether the appropriate process has been followed, for example some changes require additional information security analysis, whereas others might require consultation with industry participants. A proposal for access will be assessed by the Code Manager to confirm the details of the access request and whether the request is valid or not. This will include discussions with Service Providers on the validity/availability of requests and understand any costs associated with the request.

Where valid, the Code Manager will make a recommendation to the REC PAB, who acting in their delegated function from the REC Board will approve or reject the request. This approval is requested in accordance with Paragraph 7.5 of PAB Procedures and the REC Baseline Statement which specifies PAB as the responsible owner of the EES DAM as a Category 3 artefact.

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3 PROPOSED UPDATES TO SUPPORT MHHS

This paper proposes to amend the EES DAM to reflect new data items and market role being introduced to support the MHHS Design.

3.1 DEVELOPMENT UNDER REC MHHS STAKEHOLDER ADVISORY GROUP

The updates to the EES DAM, previously consulted upon and agreed under the REC MSAG, are in the attached 'MHHS Consequential Change - Data Access Matrix 26.04.23.xls'.

The principle used for new MHHS data items is to provide organisations with access to information on the basis of existing functionally similar data items. The data items will be provided to existing REC Service Users with access to those similar data items. Data Services have been added as a direct replacement for Data Collectors in the MHHS arrangements. Further background, and explanation to the updates, can be found in the attached solution document, 'MHHS Consequential Change - EES Data Access v4.0 02.11.2023'.

A summary of the proposal for assigning access to the new data items is provided here:

MHHS Data Item	Access Proposed	Consumer impact if confidentiality breached
Manufacturers Make and Type	Reflects access to Meter Serial Number	Little to none
Disconnection Date	Reflects access to Meter Serial Number	Little to none
Import/Export MPAN Supplier ID	Reflects access to Supplier MPID	Could be used for targeted sales
DUoS Tariff ID	Reflects access to Line Loss Factor	Little to none
DUoS Tariff ID Effective From Date	Reflects access to Line Loss Factor	Little to none
Data Service Effective From Date	Reflects access to Data Collector Id	Little to none
Data Service MPID	Reflects access to Data Collector Id	Little to none
Data Service DIP ID	Reflects access to Data Collector Id	Little to none
Metering Service DIP ID	Reflects access to Meter Operator Id	Little to none
Assigned MDR Effective From Date	Reflects access to Data Collector Id	Little to none
Assigned MDR MPID	Reflects access to Data Collector Id	Little to none
Assigned MDR DIP ID	Reflects access to Data Collector Id	Little to none
Customer Direct Contract Data Service Flag	Access provided to all Market Participant user types	Little to none
Customer Direct Contract Data Service DIP ID	Suppliers only to reflect MHHS design - IF038 notes	Could be used for targeted sales and commercially sensitive

Customer Direct Contract Metering Service Flag	Access provided to all Market Participant user types	Little to none
Customer Direct Contract Metering Service DIP ID	Suppliers only to reflect MHHS design - IF038 notes	Could be used for targeted sales and commercially sensitive
Market Segment Indicator	Reflects access to Connection Type	Little to none
Market Segment Indicator Effective From Date	Reflects access to Connection Type	Little to none
MHHS Indicator	Access provided to all EES User Categories	Little to no impact and is required to identify how to treat the MPAN and which tariff to offer

The proposed approach for three data items relating to Annual Consumption are not detailed above, as following further scrutiny it has been amended – see section 3.2.1 of this paper.

3.2 FURTHER REQUIREMENTS

Since the version of the EES DAM agreed at REC MSAG, additional updates have been identified following further developments within the MHHS Programme.

3.2.1 UPDATED DATA ITEMS

The following data items have been renamed to reflect the MHHS Design:

Data Items
Domestic ~~Consumer~~ Premises Indicator
~~Meter Operator~~ Metering Service
~~Meter Operator~~ Metering Service Appointment Date
~~Meter Operator~~ Metering Service Deappointment Date
~~Meter Operator~~ Metering Service Name

Under the MSAG Consequential Change the data items relating to Annual Consumption were proposed to be available to ‘All EES User Categories’. Following further scrutiny under the R0118 data access process, this has been revised and greater restriction proposed as set out in the below table:

MHHS Data Item	Access Proposed	Consumer impact if confidentiality breached
Annual Consumption	Access provided to EES User Categories with requirements for	Sensitive as it has the potential to identify individual

	switching, theft or settlement purposes	consumption at a premise level, for example it could help to identify vacant premises
Annual Consumption Effective From Date	Access provided to EES User Categories with requirements for switching, theft or settlement purposes	Little to none
Annual Consumption Quality Indicator	Access provided to EES User Categories with requirements for switching, theft or settlement purposes	Little to none

3.2.2 ADDITIONAL NEW ITEMS

The following data items have been created and access is proposed as indicated below:

New MHHS Data Items	Access Proposed	Consumer impact if confidentiality breached
Data Service Effective to Date	Reflects access to Data Collector Id	Little to none
Data Service Name	Reflects access to Data Collector Id	Little to none
Customer Direct Contract Data Service MPID	Suppliers only to reflect MHHS design - IF038 notes	Little to none
Customer Direct Contract Metering Service MPID	Suppliers only to reflect MHHS design - IF038 notes	Little to none
Distributor DIP ID	Reflects access to Distributor MPID	Little to none
Supplier DIP ID	Reflects access to Supplier MPID	Little to none

4 INFORMATION SECURITY, DATA PROTECTION AND ANY SPECIFIC CONSIDERATIONS

The amendments to the EES DAM have been considered by RECCo, and the Data Privacy Impact Assessment held by RECCo has been updated with a Supplementary DPIA completed considering the new data items and the impact on the existing full DPIA. Through this process no additional controls were identified as being required.

One additional Medium Risk was identified around maintaining data integrity, given the new process for updating data items via DIP Messages. This risk has been mitigated by robust validation measures to identify missing messages being built into the EES MHHS solution.

Provision and access to data within EES is already subject to ISDP at the highest level. The updates to the EES DAM are being made for access to data in an existing system and on the basis that it will be accessed under the same security criteria as the existing EES data items. For the majority of the new or amended data items, a review of ISDP is not considered necessary. However, a small number of data items have been identified as more sensitive including Annual Consumption which is considered personal data. The Code Manager will therefore undertake further activity to ensure appropriate ISDP is in place in relation to these data items prior to implementation and provide PAB with an update in March 2025.

5 APPROACH TO RECENTLY APPROVED DATA ACCESS REQUESTS

The Code Manager has reviewed new data access requests received since the November 2023 version of the MHHS EES DAM. The Change Proposals that have been considered are in Appendix.

The approach to proposed access is:

- New users in existing User Category: access is based on that determined for existing User Category – no impact to DAM
- New EES User Category: no access provided under this paper. MHHS data items to be considered as next step or on request by organisations.
    - Exception: Switching Service Desk – MHHS data items provided on the same principles as those agreed at MSAG, with additional scrutiny for Annual Consumption

The Code Manager will also be revising the data access operational process to ensure that MHHS data items will be considered in all new access requests from 01 January 2025. An update to PAB will be provided once this has been developed. In progress access requests will need a review against the MHHS baseline provided by this paper.

Any access agreed for MHHS data items will be included in the EES DAM implemented at MHHS Milestone M8.

6 FUTURE CLASSIFICATION

In consideration of the potential changes to data access in the future, currently being developed under R0148 - Introduction of classification-based access model, the new MHHS data items are being included in the scope of that change.

7 SERVICE PROVIDER IMPACT

The requirements for the changes to EES have been developed and scoped by RECCo and the EES Provider in their delivery plans for MHHS. Delivery of the changes are on track for implementation at MHHS Milestone M10.

8 CONCLUSIONS

Based on the identified impacts of disclosure we have been through the existing user categories to identify:

1. Organisations who would have a need to access this data based on their industry role
2. Other interested organisations who may wish to access this data

In addition, the new Data Services user category has been provided with data items on a like for like basis with the existing Data Collectors.

Where data is not sensitive we have proposed access is provided, but have proposed access is only provided where there is a need to know for sensitive data (including both sensitive to the consumer and commercially sensitive information). This has resulted in the 'Electricity Data Access Matrix v4.1 MHHS updates' attached for approval.

9 NEXT STEPS

The Code Manager will trigger a consultation on 18 December 2024 to 15 January 2025. If the Consultation responses return no concerns that would require the Code Manager to revisit the proposal, the Code Manager will implement changes to the DAM via a Category 3 Change Proposal on the date which is in line with MHHS Programme milestone, M8 'Code changes delivered'. This aligns with other MHHS related Change Proposals including the main MHHS Change Proposal, R0209 - Implementation of Market-wide Half Hourly Settlement (MHHS) Arrangements.

There will be clear communications issued to all impacted REC and non-REC parties, as with a standard REC release. All EES training guides will be updated. This will all be set out in the planned EES training webinar in Q2 2025. A 'Sandbox' version of the EES API is available for Parties to access and view the updated service ahead of implementation.

10 PAB ACTIONS

PAB Members are invited to take the following actions:

- **AGREE** with the Code Manager recommendation on the proposed approach to the access requests not considered by MSAG;
- **AGREE** with the Code Manager recommendation on the proposed alterations to the EES Data Access Matrix; and
- **AGREE** with the Code Manager recommendation on the implementation on the **date which will be determined by the Authority in line with MHHS Programme milestone, M8 'Code changes delivered'**.

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USEFUL LINKS

REC MHHS Stakeholder Advisory Group Committee Page and Terms of Reference

R0118 - Review of Schedule 12 and processes to manage access to data

R0209 - Implementation of Market-wide Half Hourly Settlement (MHHS) Arrangements

APPENDIX

Data access Change Proposals since REC MSAG baseline of EES DAM.

- R0043 - Commissioning of Works by the Crowded Meter Room Coordinator (CMRC) to Resolve Issues In Crowded Meter Rooms - New user category, MHHS data items not provided, to be considered as next step
- R0071 - DCC access to EES and GES – for the Switching Service Desk, data items assigned to new User Categories based on the same principles as those agreed at MSAG and further scrutiny for Annual Consumption
- C3-0057 - Data Access Request for Virtual Lead Parties – No impact, amendment to existing data item access for existing user category
- C3-0063 Process 4 Implementation – New user categories, MHHS data items not provided, to be considered as next step:
    - Service Provider to Local Authorities
    - Category of Service Provider to End-Users – Electric Vehicle Charging
    - Service Provider to End-Users – Demand Flexibility
- C3-0073 - Data Access Request UKRPA – No impact, amendment to existing data item access for existing user category
- C3-0076 - Data Access Request Service Provider to End-User Electric Vehicle Charging and Demand Flexibility – No impact, amendment to existing data item access for existing user category
- C3-0087 - Government Departments in England, Scotland & Wales DAM update – Newew generic user category, absorbing HMRC and DWP, but all data items to be confirmed, same approach to be applied to MHHS data items
- C3-0094 - Electricity DAM - Service Provider to End-User - Demand Flexibility - New user category, MHHS data items not provided, to be considered as next step
- C3-0105 - Addition of data items to the Electricity DAM for third party service provider non switching category – New user categories, MHHS data items not provided, to be considered as next step:
    - Third Party Service Provider (Non-Switching)
    - Housing Associations