RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination, and publication.

REFERENCE	**RECPAB_25_0225_05**
STATUS	**FOR DECISION**
PAGES	**5**

DATA ACCESS REQUEST

CREATION OF A NEW CATEGORY FOR THIRD PARTY LEGAL ADVISORS ON THE GAS AND ELECTRICITY DATA ACCESS MATRIX

AUTHORED BY ELISE HANDY – OPERATIONAL ACCOUNT MANAGER

REVIEWED BY GLENN SHEERN – HEAD OF REGULATORY SPECIALISTS

FOR DECISION 	PAB Members are invited to take the following actions: • **APPROVE** the Code Manager's proposed alterations to the Electricity Data Access Matrix; • **APPROVE** the Code Manager's proposed alterations to the Gas Data Access Matrix; • **APPROVE** the Code Manager's proposed alterations to Appendix 1 of the Data Access Matrix; • **APPROVE** the Code Manager's proposed alterations to the Service User Categorisation and Assessment Document; • **APPROVE** the Code Manager's implementation date of these changes for 28 March 2025.
APPENDICES 	• RECPAB_25_0225_05a - Data Access Matrix - Appendix 1 v1.6_Draft • RECPAB_25_0225_05b - Electricity Data Access Matrix v4.5 • RECPAB_25_0225_05c - Gas Data Access Matrix v4.3 • RECPAB_25_0225_05d - REC Service User Categorisation V5.5_Draft

1 THE ROLE OF THE REC PAB

The REC PAB determine access requests in accordance with the Code Manager's recommendation because the 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 key 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.

2 BACKGROUND

RGL Management provides dispute resolution and litigation services to non-domestic Consumers. For the effective and efficient administration of these services, the organisation needs to understand a Consumer's gas or electricity meter information and Supplier history. Part of any legal process is to verify what has been provided by the Consumer with reliable information that can be traced back to a central source.

3 JUSTIFICATION FOR USE CASE

Providing legal firms with this information will ensure that details used in dispute cases are centrally sourced and current which is critical to proper and due legal process.

Consumer consent through Letters of Authority will be required to be obtained and made available to the Code Manager on request.

4 ELECTRICITY DATA ITEMS

The request covers the following data items from EES:

Data Item	Purpose	Classification (Future, subject to change based on implementation of R0148)
Address Lines (1-9)	Allows a legal firm to confirm the address provided by the Consumer matches that to the assigned meter identifier.	Personal
Postcode	Allows a legal firm to confirm the address provided by the Consumer matches that to the assigned meter identifier.	Personal
Current Supplier	Allows a legal firm to verify the current Supplier name provided by the Consumer.	Always Open
Current Supplier Registration Date (DC03)	Allows a legal firm to ensure that the current Supplier is the Supplier in place during the contract duration under investigation.	Always Open
Distributor Name	Allows a legal firm to contact the appropriate Distribution Network for information or refer to them in legal documentation.	Always Open
Distributor MPID (DC03)	Allows a legal firm to contact the appropriate Distribution Network for information or refer to them in legal documentation.	Always Open
Measurement Class (DC03)	Assists a legal firm in verifying charging or billing details.	Always Open

Measurement Class Date (DC03)	Assists a legal firm in verifying charging or billing details.	Always Open
Meter Type (DC03)	Allows a legal firm to verify charging and billing details and will provide information on the data it can send.	Always Open
MPAN Core (DC03)	Allows a legal firm to validate the MPAN provided by the Consumer.	Personal
Number of MPANs for Meter	Allows a legal firm to validate the MPAN or numbers of MPANs provided by the Consumer.	Always Open
Profile Class (DC03)	Allows a legal firm to verify charging and billing details.	Always Open
Profile Class Date (DC03)	Allows a legal firm to verify charging and billing details.	Always Open

5 GAS DATA ITEMS

The request covers the following data items from GES:

Data Type	Data Item	Purpose	Classification (Future, subject to change based on implementation of R0148)
Supply Meter Point Information	Current Supplier Short Code (or where displayed as the Name, the Current Supplier Organisation Name)	Allows a legal firm to verify the current Supplier name provided by the Consumer.	Conditionally Open
Supply Meter Point Information	Current Supplier Effective Date	Allows a legal firm to verify when the current Supplier was appointed.	Conditionally Open
Supply Meter Point Information	Current Supplier Effective to Date	Allows a legal firm to verify when the current Supplier will be active to.	Conditionally Open
Supply Meter Point Information	Previous Supplier Short Code (or where displayed as the Name, the Previous Supplier Organisation Name)	Allows a legal firm to understand who the previous Supplier was.	Conditionally Open
Supply Meter Point Information	Previous Supplier EFD	Allows a legal firm to understand when the previous Supplier was effective from.	Conditionally Open
Supply Meter Point Information	Previous Supplier ETD	Allows a legal firm to understand when the previous Supplier was effective to.	Conditionally Open
Meter Read History	Latest Meter Read Date	To provide clarity of the latest meter read details when investigating charging history.	Always Open
Meter Read History	Latest Meter Read Type	To provide clarity of the latest meter read details when investigating charging history.	Always Open
Meter Read History	Latest Meter Read Value	To provide clarity of the latest meter read details when investigating charging history.	Always Open

Supply Meter Point Information	Meter Point Reference Number	Allows a legal firm to validate the MPRN provided by the Consumer is correct.	Personal
Supply Meter Point Information	Network Short Code (or where displayed as the Name, the Network Organisation Name)	Allows a legal firm to contact the appropriate Network for information or refer to them in legal documentation.	Always Open
Supply Meter Point Information	Postcode	Allows a legal firm to confirm the address provided by the Consumer matches that to the assigned meter identifier.	Personal
Supply Meter Point Information	Address	Allows a legal firm to confirm the address provided by the Consumer matches that to the assigned meter identifier.	Personal
Supply Meter Point Quantities	Supply Meter Point AQ	Allows a legal firm to verify charging and billing details.	Conditionally Open
Supply Meter Point Information	Supply Meter Point Class	Allows a legal firm to verify charging and billing details.	Conditionally Open

6 DATA PROTECTION, INFORMATION SECURITY AND ANY SPECIFIC CONSIDERATIONS

Both the Gas and Electricity DAMs include Category Conditions to ensure there is Consumer Consent prior to data access.

Specific controls will also be introduced to validate Consumer Consent through data sampling and the parameters of this will be relevant to the organisations that are onboarded to this Category.

For Electricity, both the GUI and API will be available however for Gas, reports will be the only option to access data. The Code Manager will therefore need the MPRN to be provided to share the information.

To prevent database scraping, the Code Manager is investigating with the Service Provider rate limits being applied to the API. This will be set by the Code Manager on a case-by-case basis in conjunction with the Access Agreement prior to approving access.

Based on the nature of this request we propose the following category conditions are included:

EES - Third Party Legal Advisors (CC12)

Data Item access is dependent on appropriate customer consent which will be made available to the Code Manager on request.

Data sampling will be conducted by the Code Manager on a regular basis.

GES - Third Party Legal Advisors (CC17)

Data Item access is dependent on appropriate customer consent which will be made available to the Code Manager on request. Data sampling will occur on a regular basis.

Users must provide MPRN as an input parameter.

The Category Condition or DAM which contains the Category Condition, is included within the access agreement which binds the Enquiry Service User to gain customer consent to access this data.

The below table has been completed in line with the Service User Categorisation and Assessment Document and sets out that this is a new Category so there are no current ISDP requirements. The Code Manager proposes that if a report or the online portal is the method of data consumption, a medium level (Verification Assessment) of ISDP is required and for an API, a high level (Standard Assessment) is required. Reports are the only option for the GES.

		Description	Current	Proposed
ISDP Level	Medium	Assessment relevant security accreditation (cyber essentials +)	N/A	Verification External Assessment for GUI and Bespoke Reports
	High	Assessment if information security risk management in REC relevant areas	N/A	Standard External Assessment for API

7 NEXT STEPS

The Code Manager will publish a 10-working day consultation on 28 February 2025 to 14 March 2025. If the consultation responses return no concerns that would require the Code Manager to revisit the request, the Code Manager will implement changes to the REC documentation on 28 March 2025.

8 PAB ACTIONS

PAB Members are invited to take the following actions:

- **APPROVE** the Code Manager's proposed alterations to the Electricity Data Access Matrix;
- **APPROVE** the Code Manager's proposed alterations to the Gas Data Access Matrix;
- **APPROVE** the Code Manager's proposed alterations to Appendix 1 of the Data Access Matrix;
- **APPROVE** the Code Manager's proposed alterations to the Service User Categorisation and Assessment Document;
- **APPROVE** the Code Manager's implementation date of these changes for 28 March 2025.