RETAIL ENERGY CODE

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PAB DEROGATION REPORT – MHHS CERTIFICATES RELATING TO REBEL ENERGY

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FOR DECISION	This paper covers how certificates to the Central Switching Service (CSS) test environment being used for Market-wide Half Hourly (MHHS) testing are to be managed. Specifically, it proposes that the test certificates relating to Rebel Energy are maintained to avoid disruption to the MHHS Programme, following Rebel Energy entering the Supplier of Last Resort (SoLR) process.
APPENDICES	Appendix 1 – Schedule 19 extracts

1 BACKGROUND

The MHHS Programme has multiple testing activities to provide assurance that, prior to go live, new technology and business processes are operating as intended. One of these is System Integration Testing (SIT). This testing activity involves multiple market participants testing the system simultaneously, for example Suppliers taking actions that Distribution Network Operators (DNOs) need to respond to. The MHHS Programme can then check that the different market participants received the information they needed through the process, and that the central records were updated as expected.

Market participants were asked to volunteer to participate in SIT, and were provided procedural incentives to do so, such as providing access to a qualify at the earliest stages. Typically, larger market participants were more likely to volunteer. One technology provider to small Suppliers, ESG, agreed to provide test environments and testing support to act in SIT, with the agreement of one of their customers, Rebel Energy. Rebel Energy has entered the Supplier of Last Resort (SoLR) process as it does not have the financial resources to be able to operate and have ceased to be a REC Party. Removing Rebel Energy from the SIT process would be disruptive to the MHHS Programme, and we therefore are seeking input from the PAB on the best way to proceed.

1.1 STANDARD PROCESS DURING A SUPPLIER OF LAST RESORT PROCESS

The exiting Supplier's access to REC Services is removed during a SoLR process. This reflects good security practice that removing unnecessary access limits the likelihood of inappropriate activity, either from external cyber actors or from within the organisation. On that basis, the following access has been revoked:

1. Access to the REC Enquiry Services, to prevent former employees logging in and accessing consumer information.
2. CSS certificates, which prevents the exiting Supplier from initiating any new switches, or otherwise interacting with CSS.
3. Service Now access (the Switching Service Desk).

This revocation is required by REC Schedule 19 – Market Exit and Supplier of Last Resort, however, this schedule is not clear as to whether the revocation of certificates relates to only live certificates, or all certificates (e.g. to test environments). Usually, all test certificates would be revoked as well.

1.2 HOW ESG AND REBEL ENERGY HAS OPERATED IN SIT

ESG have volunteered to operate within SIT with Rebel, understanding that this will allow their technology to be tested for all their customers. They have therefore created a separate test environment for this testing. This environment connects with other SIT components, most notably a CSS test environment for which CSS certificates have been issued.

Rebel are not involved in the management of this test environment or the resources to execute testing.

1.3 HOW MHHS MANAGE SIT TEST DATA

The MHHS Programme need representative data for their tests to be effective. hey have therefore taken an extract of industry data at a set date to populate systems, creating new dummy data for participants to test with. This copy of industry data includes data from Rebel, as well as all other participants. The MHHS Programme therefore considers that the risks associated with the data within the test environment are not affected by which participants are in SIT, or the failure of Rebel Energy.

Elexon act as data controller and are therefore responsible for how this data is processed and the security of this data. The REC Code Manager does not consider that there are any risks relating to this

data that the REC PAB or the REC Service Providers are responsible for, other than the REC Service Providers continuing to maintain the security of their test environments.

1.4 PROPOSED DEROGATION

The MHHS Programme have agreed with ESG that a different ESG Supplier (E (Gas and Electricity) are now taking on this role, but they wish to do this without issuing new certificates, to avoid disruption to the testing process.

We request that the PAB enable the current test systems to continue to operate as they are, by providing a Derogation or clarifying decision that these certificates are not revoked.

PAB DECISION

The Code Manager recommends the PAB to **APPROVE** that the Rebel Energy certificates for MHHS are maintained until the completion of SIT Testing.

Should this be approved, we will share this decision with the Data Communications Company (DCC).

Whilst this does not directly relate to British Gas, we have made them aware of this activity and they have requested that, if the Derogation is approved, they are provided with written confirmation that no staff from Rebel Energy have access to this environment.

We have included in Appendix 1 the relevant schedule items that resulted in the need for this paper.

2 DEROGATION CONDITIONS

We propose the following conditions are applied to the Derogation:

1. That the Derogation exists until the end of SIT, which we expect to run until August 2025.
2. That RECCo Service Management track the revocation of these certificates at the end of SIT, to avoid accidentally leaving them active.
3. That ESG confirm that Rebel energy staff (or former staff) do not have access to this environment.
4. That the MHHS Programme agrees to update their records to rename the Rebel Energy test accounts ‘E’ so that other Parties are not confused or concerned about Rebel Energy still being active in MHHS.

3 ALTERNATIVES CONSIDERED

In developing this paper, we considered the following alternatives:

1. Rotating the test certificates, so that E are issued with new certificates. The MHHS Programme have rejected this because of the delays to SIT, and the impacts this would have on other testing Parties.
2. Revoking the certificates and asking the MHHS Programme to find a replacement Supplier unrelated to ESG, or to simply operate with fewer Suppliers in SIT. Due to the fact that SIT is in progress, this approach is unrealistic, or would have a significant impact on the MHHS Programme.

APPENDIX 1 – REC EXTRACTS

We have included below the references within the REC that are relevant to this paper.

Please note the Code does not clarify the meaning of security credentials, for example if they solely relate to production certificates.

Market Exit and SoLR Schedule

5.8.5	As soon as reasonably practicable, following receipt of the notification in 5.8.1.	Raise a Switching Service Request to give effect to the SoLR event including revocation of the failed Energy Supplier's CSS security credentials.	Code Manager	Switching Operator	SoLR Switching Service Request	Switching Portal
5.8.6	Following receipt of the Switching Service Request in 5.8.5 and before the Replacement Supplier effective date.	Initiate revocation of the failed Energy Supplier's CSS security credentials in accordance with the CSS Schedule and terminate access to the Switching Portal.	Switching Operator		Internal Process	N/A

CSS Schedule – Paragraph 9

9.2. Where an organisation ceases to be a CSS User, the Code Manager shall notify the CSS Certificate Authority who will revoke the relevant security certificates.

9.3. Where a CSS User who uses a CSS Interface Provider ceases to be a CSS User, the CSS Certificate Authority shall ensure that only the Message Signing Certificate for the CSS User is revoked.