RETAIL ENERGY CODE

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QUALIFICATION

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FOR DECISION 	The Code Manager requests the PAB to approve that updates to MHHS Qualification document can be approved by the REC Code Manager where: • The initial document was previously approved by PAB • The updates to the document do not substantially change the approach taken to MHHS Qualification, but instead reflect practical and housekeeping changes

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

REC Schedule 29 (Address Management Service) limits the use of Retail Energy Location (REL) data solely for switching purposes. This is due to the initial licence that DCC procured from the Ordnance Survey for the REL Data. Third Party Intermediary Service Providers have requested that this information is shared with them for non-switching purposes. We anticipate that organisations will use this data for improved operational efficiency, regulatory compliance, and service delivery across various non-switching applications.

I0218 seeks to broaden access to this information, for organisations with existing Ordnance Survey licences being able to access the REL data through the Enquiry Services.

The Code Manager is in the process of impact assessing this change and wish to highlight this change to the PAB as it has an impact on information security and data protection requirements that the REC Board has delegated to the PAB.

It is possible that this change will require tailored monitoring or specific checks of whether the user has an appropriate Ordnance Survey licence before granting access, or even the need to understand and control how a user uses this information (i.e. understanding if they will then share this information with others).

RECCo has had discussions with Ordnance Survey, but not got into details of the specific licence conditions. On that basis we will provide more detailed impact assessment when the licence conditions are available, and involve the PAB in any decisions on what procedures need to be put in place to manage this risk at that point.

2 WORK OFF PLAN FUTURE TEMPLATE

As noted in the MHHS Qualification Approach and Plan, a Party may need to agree a work-off plan to cover any outstanding defects from System Integration Testing (SIT) or Qualification Testing (QT) as part of their MHHS Qualification Assessment Document submission.

The REC Code Manager will monitor these work-off plans using the existing process for Action Plans as part of the Performance Assurance Methodology & Techniques.

The REC and BSC are developing a joint submission template to capture these work-off plans. This template has been developed in-line with the existing information that the REC Code Manager would expect to be included as part of an Action Plan PAT. This month, the MHHS Programme will present at the BSC PAB an initial view of how the handover from SIT to the Code Bodies will be managed, and what the work-off template will contain. As the work-off plan will be following similar processes to the existing REC process, the REC Code Manager is not completing a similar activity with the REC PAB at this time, but the REC PAB will be informed when the solution and documents have been further developed and invited to provide feedback alongside other Industry participants before the process is finalised.

3 QUALIFICATION STATUS - MARKET ENTRY AND METERING TRACKERS

The REC Code Manager has included the following information in the 'Market Entry Tracker' and 'Metering Tracker' to provide PAB with the latest status of Qualification applications and escalations:

Market Entry Tracker

- **Market Entry Process Tracker – Parties** i.e. ongoing active applications to Qualify as a Supplier, DNO, or GT
- **Qualification Completion Tracker** i.e. number of Parties that have completed REC Qualification

- **Market Entry Process Tracker – Enquiry Services** i.e. ongoing active applications to gain access to REC Enquiry Services
- **Overdue Tracker** i.e. the breakdown of Parties that have completed their Annual Maintenance of Qualification submissions
- **Change Notifications** i.e. ongoing system and process changes that the Code Manager is monitoring
- **Specific Org Action** i.e. ongoing escalations by the REC Code Manager, including incomplete Maintenance of Qualification submissions

Metering Tracker

- **Metering Process Tracker** i.e. ongoing active applications to Qualify as an AMI, EMO, MAM, MOA, or SIP
- **Metering Process Applications** i.e. breakdown of applications by role
- **Specific Org Action** i.e. ongoing escalations by the REC Code Manager including those raised by the CoMCoP Scheme Auditor

The REC Code Manager would welcome any feedback from PAB Members on the Market Entry and Metering Trackers, including whether there is any further information you would like to see, and on the format of sharing these in a Dashboard rather than in the PAB Papers.

4 PAB APPROVALS AND DELEGATION

4.1 RESPONSIBILITIES

As noted in the REC Performance Assurance Schedule, it is the role of PAB to make determinations in relation to the application of Performance Assurance Techniques in order to mitigate the risks to REC Service Users and/or REC Service Providers that may result from non-compliance.

Additionally, the schedule notes that the PAB shall have the right at any time and from time to time to delegate or procure the delegation of all or any part of the day-to-day administration of its functions.

As an example of how this delegation has been applied in practice, the Code Manager has previously outlined the approach we will take to Parties that have not completed their Maintenance of Qualification activities, including the actions that will be applied against them. The PAB approved this general approach, and as such, the Code Manager does not seek approval before applying these actions, but instead notifies PAB when they have been applied, and seeks approval where we wish to apply actions not in-line with the previously agreed approach.

The Code Manager believes that a similar process can be applied to the two cases outlined below.

4.2 MHHS QUALIFICATION DOCUMENTATION

The REC PAB's role within the MHHS Qualification process is to:

- Set the policy, approach, and risk appetite for MHHS Qualification under REC
- Take key decisions on the nature, extent, and timing of assurance activities
- Discharge the responsibility to make individual Qualification decisions to the Code Manager

When the Code Manager develops new documents to outline the framework for these Qualification decisions, we ask PAB to approve these frameworks; this includes the MHHS Qualification Approach and Plan, the MHHS REC Assessment Criteria, and the MHHS Qualification Assessment Document.

When minor changes are made to these documents, we have previously requested that PAB explicitly approve these changes. In many cases, these updates are not substantive changes but instead reflect

practical changes (e.g. based on the technical limitation of the MHHS test environments), the removal of outdated information, and housekeeping changes.

The need for PAB approval leads to a delay in the publication of these documents. The Code Manager therefore seeks PAB to delegate the responsibility for approving these changes to existing documentation where:

- The initial document was previously approved by PAB
- The updates to the document do not substantially change the approach taken to MHHS Qualification, but instead reflect practical and housekeeping changes

PAB will be subsequently notified of any changes made to MHHS Qualification documentation in-line with the above conditions.

PAB DECISION



The Code Manager recommends PAB to approve that updates to MHHS Qualification document can be approved by the Code Manager where:

- The initial document was previously approved by PAB
- The updates to the document do not substantially change the approach taken to MHHS Qualification, but instead reflect practical and housekeeping changes