RETAIL ENERGY CODE

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REC ISSUE GROUP
MEETING NOTES

DATE	**13 October 2023, 10:00**
LOCATION	**By teleconference**

1 INTRODUCTIONS

The Chair welcomed attendees to the meeting of the REC Issue Group (RIG).

The Chair confirmed the agenda, asking for Any Other Business (AOB) to be raised at this time. The Chair highlighted that one Data Cleanse AOB item was raised prior to the meeting, with one further AOB item being raised at this time. Later in the session, RIG members noted the following AOB item for discussion:

- SDEP Performance and Reporting

2 MPRS REJECTING D0205'S

An Elexon representative provided an overview of the Market Domain Data (MDD) and MD Change Requests, which can be found on slides 5-15 of the pack here.

It was noted that an issue was raised at a previous RIG meeting, whereby D0205's being sent by parties were being rejected by MPRS. The Elexon representative advised that this issue had also been raised in another forum. It was identified that this was due to an MPID being end dated in the MDD on the request of a party. The MPID was end dated in the MDD on a trust basis, with the party suggesting they had completed all the relevant checks and confirmed they had no more MPANs registered to the MPID. It was confirmed that as part of the November MDD cycle, the MPID will be re-opened, meaning the end date will be removed. This will mean the D0205's which were originally rejected, will be reprocessed.

To prevent this from happening again, the REC will inform Elexon of a parties intent to withdraw, before the party notifies Elexon of their intent to withdraw. The REC will also, two days before the confirmed withdrawal date, send Elexon another circular to confirm the party has completed all the steps before withdrawing.

A RIG member asked if the REC will proactivity check the Electricity Enquiry Service (EES) to confirm that a parties MPID has no MPANs registered to it. The Chair advised for voluntary withdrawals; the obligation is on the party to ensure they have no MPANs

registered to their MPIDs, but that as part of the withdrawal process the REC do check to confirm that the withdrawing MPID doesn't have any MPANs. The RIG member asked if this will be a new process. The Chair confirmed it is a current process, however if the parties withdraws without notifying the REC, the checks are not completed.

A RIG member asked if any checks will be completed on other MPIDs which have been terminated recently. It was highlighted this was the first Meter Operator who withdrew from the REC since go live. The RIG member noted the need to ensure this issue doesn't happen again with other parties who may have withdrawn. The presenter confirmed for Data Aggregator and Data Collector withdrawals, it's Elexon who solely handle these. They elaborated for Meter Operators, the responsibility is split between Elexon and the REC, with the aim being to fill in any gaps in the process.

Another RIG member mentioned they had identified issues with two MPID's, whereby they were receiving asynchronous errors. They elaborated the MPIDs have been end dated, but the CSS is not recognising they have been end dated. They further elaborated the CSS advised they were waiting for the information to come from Elexon. The RIG member asked if this will be addressed within the review of the process and the information being passed through to CSS. The presenter advised this was a different process, with neither of the MPID's being end-dated. They elaborated these MPIDs were added to the MDD, but there was a delay between adding it to the MDD and updating the CSS, which has now been resolved. They further elaborated this was a slight gap in that process, which has now been filled.

3 DATA CLEANSE UPDATE

3A DATA CLEANSE REPORTING

The Code Manager Lead Analyst advised the data in the Smart Meter Type or MTC Mismatch reports is heading in the wrong direction. The values are increasing on a monthly basis, with another increase of five thousand this month. The Code Manager Lead Analyst also highlighted the data in the No Meter MTC – No MSN reports is heading in the right direction. They noted a slight peak in September, but the values have decreased once again. The Code Manager Lead Analyst mentioned in June 2023 there was a peak in the MTC 6A reports, but since then there has been a steady decrease, the same trend was seen in September and October 2023.

No comments were raised on the Data Cleanse Reporting update.

3A DATA CLEANSE AOB: RELATED MTC REPORTS

A RIG member provided an overview of the Related MTC Reports, which can be found on slide 19 of the pack here, and suggested that there were arguments for the MTC data cleanse measures being removed.

The subject of scrapping the MTC data cleanse reports was discussed at the last PAB meeting and deferred to RIG. They elaborated that the reporting could still be sent to parties to cleanse, however there should be no targets related to them. Several RIG members agreed with this proposal. The Chair asked if RIG members had any issues with the end of year targets being stopped on the MTC data cleanse reports, to contact the Code Manager. They elaborated if no comments are received, a proposal will be taken to PAB confirming RIG were supportive of the removal of end of year targets.

The RIG member raised another point, specifically around invalid MAP ID's. The RIG member mentioned it is the responsibility of the installing Supplier to handle invalid MAP ID's. They elaborated at the end of the process; it requires the Change of MAP process to be initiated by the MAP, by them sending the D0304 to the MEM, and the MEM updates the industry. The RIG member advised there are specific MAP's they don't hold contact details for, which is making the cleansing of the invalid MAP ID reporting difficult.

The Chair mentioned there is an open issue on the RIG issue log surrounding MAP ID's and the understanding is, the Performance Assurance team were working with the MAP's on how best to resolve this. The Code Manager confirmed they had been in discussions with MAPs to try and gather data which will allow Suppliers to reduce their volumes in the invalid MAP ID reports. They elaborated this is moving slightly slower than originally envisaged.

Another RIG member noted there have been instances of MAP ID's which are invalid, and they have been working with the Supplier to redirect these queries to the correct MAP ID. They elaborated they have been looking at ways internally on how to resolve this issue and as soon as they find a resolution, they will be able to liaise further. Another RIG member suggested some additional reporting methods that could be used to provide more detail on this issue.

The Code Manager Lead Analyst confirmed that they are looking at a slightly different route with these reports and would want to finish conducting their investigation before considering what is the best approach. They confirmed that approach will be bought back to RIG to discuss.

4 R0092 – DCC SERVICE LEVEL AGREEMENTS FOR THE SWITCHING INCENTIVE REGIME

The Code Manager Lead Analyst provided an overview of R0092 – DCC Service Level Agreements for the Switching Incentive Scheme, which can be found on slides 21-27 of the pack here.

The aim of this discussion was to make RIG members aware that an Impact Assessment will be triggered on 13 October to gain party feedback on the DCC proposals, with the hope of receiving feedback from RIG members. No comments were raised by RIG members at this time, but if they wish to ask questions on R0092 they can contact change.management@recmanager.co.uk.

5 R0117 – RETROSPECTIVE IMPLEMENTATION OF DCP383

The Code Manager Lead Analyst provided an overview of R0117 – Retrospective Implementation of DCP383, which can be found on slides 29&30 of the pack here.

The aim of this discussion was to make RIG members aware than an Impact Assessment will be triggered on 13 October to gain party feedback on R0117. No comments were raised by RIG members at this time, but if they wish to ask questions on R0117 they can contact change.management@recmanager.co.uk.

6 RETURN OF MPRN FROM POSTCODE SEARCH ON GES

The Code Manager Lead Analyst provided an overview of the Return of MPRN from Postcode Search in GES, which can be found on slides 32-34 of the pack here.

A RIG member noted they would need to check internally within their business of the severity of this issue. They elaborated this can be discussed further at the next RIG, when members have been able to obtain more information. The Code Manager Lead Analyst highlighted this hasn't been raised as a formal CP yet, it's been bought to RIG for discussion. They elaborated the aim is to identify if this is an issue which requires urgent resolution, and if there are any alternative solutions or workarounds in place.

The Chair confirmed this will be kept on the agenda for next month's RIG meeting, giving members the opportunity to discuss in more detail, following investigation.

7 CONTROLLED DISTRIBUTION OF 'CONSOLIDATED REPORT' EXTRACTS OF METER DATA

The Code Manager Lead Analyst provided an overview of the Controlled Distribution of 'Consolidated Report' Extracts of Data, which can be found on slides 36-38 of the pack here.

A RIG member noted on the EES API, parties are obligated to pay if go above their band limit. They asked if the reports are being issued, is there a possibility of parties using the reports, rather than the API to obtain the data for free. The Code Manager Lead Analyst confirmed REC parties are able to receive the information without any other charges. They elaborated non-REC parties have contracts in place, and if they go above the limit set out in their banding, there is a cost per call. They further elaborated if the daily flat file is introduced, it could be added into the contract as an additional service.

The RIG member mentioned that Ofgem initiated the termination of the Consolidated Report, therefore if parties are asking for it to be reinstated, Ofgem need to be consulted before a CP is raised, as we wouldn't want to go through the change process, just for Ofgem to reject. The Code Manager Lead Analyst highlighted that the concerns from Ofgem in relation to the monthly report, were primarily that by the time all parties had received the data, it was already out of date. They confirmed Ofgem will be consulted on this proposal.

Another RIG member mentioned even if a daily file is sent, it will still be out of date as soon as it was sent. They elaborated the point of the API is its live data. They further elaborated from a GDPR perspective, issuing a whole data set every day to every party doesn't meet the data minimisation requirements of GDPR. The Code Manager Lead Analyst confirmed this would be a consideration for the PAB.

The Proposer highlighted the biggest issue is several Energy Brokers and Price Comparison Websites were wishing to use the API via the service they provide. They elaborated these parties are expecting sub second responses from the APIs, but the EES and GES API platforms don't always provide them, as they are overwhelmed. They further elaborated the platforms aren't scaled to deal with the TPI traffic. The Proposer mentioned until these platforms can be scaled up to deal with this traffic, another solution is required.

Another RIG member asked in terms of queries per second, what are the limitations are of the EES and GES API's. The Code Manager Lead Analyst confirmed they will investigate the limitations of the platforms. They elaborated a potential solution could be to give parties set agreed times on when they can log into the EES and GES API's. Several RIG members dismissed that proposal. A RIG member advised when they log in is dependant on when a customer contacts them, after they have been on a switching site. They elaborated the EES and GES APIs should mirror the capabilities of the CSS.

The Chair mentioned RECCo are currently looking into the enquiry service platforms, and the issue of scalability could be picked up under that piece of work.

8 R0132 – CHANGE TO THE LOGICAL FORMAT OF J0001

The Chair provided an overview of R0132 – Change to the Logical Format of J0001, which can be found on slides 40&41 of the pack here.

No comments were raised by RIG members on R0132.

9 ERRONEOUS SWITCH RESOLUTION TIMELINE CHANGE

The RIG member provided an overview of Erroneous Switch Resolution Timeline Change, which can be found on slides 43-49 of the pack here.

The RIG member advised after consulting with PAB, a derogation has been set up to enable them extra time to process Erroneous Transfers. They elaborated the two-day response time was causing issues. They further elaborated that following on from the derogation and obtaining data on this, the best approach is to raise a Change Proposal to extend the response time for all parties. The RIG member commented that parties shouldn't be penalised for taking the correct amount of time to ensure they are obtaining the right outcome for their customers, even if they take longer than the two working date response time.

The RIG member highlighted the proposal is to extend the two working day response time, to a five working day response time. They elaborated this will be for the losing Supplier to verify the switch and also when the losing Supplier receives the erroneous switch from the other Supplier.

Another RIG member agreed with the proposal, explaining the current two working day response time doesn't give parties enough time to investigate a case thoroughly. They elaborated, often an ET is actioned quickly, just to comply with the response time.

Another RIG member mentioned the rationale behind the two working day SLA for the response time, was to ensure good customer experience. They elaborated it works against the rationale and extending the response time seems the right move. They further elaborated the Change Proposal needs to clearly set out what the correct amount of time should be.

The Proposer highlighted given faster switching times, by extending the time to resolve, the ET would still be resolved faster than under the old regime. They elaborated any negative impacts will be lessened. They further elaborated whilst they send out a email or letter where appropriate to the customer, they weren't intending to be prescriptive about

how to do that in the Change Proposal. They explained the Change Proposal will just allow parties extra time to respond. Several RIG members agreed with this proposal.

Another RIG member advised sometimes Suppliers reject an ET, due to wanting to investigate it. They elaborated by rejecting it within the two-day response time, they have met the SLA but they can't do any investigation within that period. They further elaborated the new proposed response time could see a drop in rejections.

The Chair explained that although the RIG can't make formal recommendations, there is broad support for a Change Proposal to be raised to adjust the response time for an ET. The Chair noted if any other RIG members would like to raise comments on this can do, they can contact recrig@recmanager.co.uk.

10 RIG ISSUE – NEW PSR CODES FOLLOWING SLC CHANGES ON PPM INSTALLATION REQUIREMENTS

The RIG member provided an overview of this issue, which can be found on slide 51 of the pack here.

A RIG member advised there is already a code for children and their birthday, meaning parties can work out if they are under two years old. The Proposer asked if this is always populated. The RIG member explained the date is a mandatory field and parties should be able to work the children's age out without introducing a new code.

Another RIG member explained there is another code for 'pensionable age', which should help parties out with the over 75's without support PSR.

The proposer mentioned this has been bought to RIG to highlight that DNO's and Suppliers might be treating these separately, when they obtain the information. They elaborated when the DNO provides updates to the new Supplier on a PSR, they might treat it as a full refresh. They further elaborated the Supplier could miss out on certain pieces of information.

Another RIG member explained it should be treated as full refresh, it's the last contact the party will have with the customer, and they should be collecting all the data. Another RIG member mentioned they do a full refresh, on receipt of the notification.

11 RIG ISSUE – OUT OF HOURS DISTRIBUTOR BYPASS – VULNERABLE CUSTOMERS

The RIG member provided an overview of this issue, which can be found on slide 53 of the pack here.

Another RIG member highlighted a DCUSA change has been raised to address this issue. They asked what the intention is in terms of the coordination between the DCUSA change and this issue. They explained the progression needs to be aligned for both. The Proposer commented they have received a number of cases from DNOs, but after investigation only one of them appeared to be a genuine fault. They elaborated the majority of cases have warrant action on them, involving an outstanding debt. They further elaborated they were not sure if this is a way for customers to avoid debt.

Another RIG member advised they had received cases too, through the Contract Manager Escalation pot on SDEP. They confirmed that their Revenue Protection team are seeing this activity, with it taking a while to get back into contact with the customer.

The Proposer explained this was raised at the last DCUSA Issues Group meeting under AOB for awareness. DCUSA are aware it's being raised at RIG and a decision on the next steps will be made following this discussion. The Proposer asked if there should be an SLA attached to how quickly the Supplier is notified as there have been cases where they have been made aware, but months down the line. Another RIG member agreed that there needs to be clear guidelines in place, around letting Suppliers know when a meter bypass has taken place.

Another RIG member highlighted when they receive calls out of hours, there has to be a judgment made for the best interests of the customer. If a DNO is slow in notifying the Supplier of actions that have been taken, it's going to cause issues for the Supplier too. They suggested they would welcome any guidance in respect to the notification element.

Another RIG member noted the difficulty in a Code being updated to provide guidance for scenarios that shouldn't be happening.

Another RIG member mentioned if their engineers arrive on site and find a problem, the Supplier raises a fault with the DNO. They explained if a DNO arrives on site and they bypass the meter, the Supplier should be told by the start of the next working day. They elaborated this will enable the Supplier to engage with the customer immediately, to try and get an engineer back on site to effectively connect the meter. They further elaborated this is a tight time frame, but it's the same when an engineer from a Supplier arrives on site and finds a problem, they have to phone the DNO straight away and stay on site. The RIG member explained this could be communicated through a data flow or an SDEP case.

Another RIG member agreed there needs to be a clear process in place for how long it takes a DNO to notify a Supplier of a meter bypass. They elaborated there has been instances of them being notified a year after the incident occurred, meaning it was too late to engage with the customer.

12 ANY OTHER BUSINESS

12.1 SDEP PERFORMANCE AND PERFORMANCE

A RIG member noted recently they have identified that the SDEP platform has been running very slowly. They mentioned there also appears to be a misalignment within the reporting, and what is outstanding. They elaborated specific results aren't being returned within reports, when searching for a MPAN/MPXN. The RIG member advised they are finding it hard to manage SDEP queries, due to not being able to gain all the information from the reporting. The aim of this discussion is to whether other RIG members are experiencing the same issue.

Another RIG member agreed the reports are difficult to use, when trying to work out what they've got outstanding.

The Chair explained there is a special RIG on 20 October, specially around existing SDEP changes, and this can be raised more formally there. The Chair advised any performance issues can be raised directly to the SDEP Service Provider.

It was noted at the special RIG on 20 October, there is a section for reporting, which could include proposed changes to the reporting.

Another RIG member asked if there was a direct correlation between SDEP being slow and the EES API being busy. They elaborated it's been slow to open and search for cases.

No further business was discussed. The Chair thanked attendees for their input and closed the meeting. The Chair noted the special SDEP meeting on 20 October 2023, with the next regular meeting scheduled for 10 November 2023.