RETAIL ENERGY CODE

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R0022 – PROPOSED SOLUTION FOR ENDORSEMENT

1 BACKGROUND

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1.1 CHANGE PROPOSAL SUMMARY

The Retail Energy Code (REC) Data Access Schedule sets out the approach to provision of market data via the Electricity Enquiry Service (EES).

The schedule categorises EES Users (REC Parties and Non-Party REC Service Users) and sets out the principles of data access. The specific data items accessible for each EES User Category are set out in the Data Access Matrix (DAM).

This approach differs from the previous arrangements under the Master Registration Agreement (MRA) where data access was agreed on a case-by-case basis. R0022 aims to resolve the access variability within EES User Categories, update EES so that it reflects the Data Access Schedule, and (where possible) progress a solution that facilitates progressing EES access applications.

It should be noted that the schedule will be extended to cover the Gas Enquiry Service (GES) at REC v3.0 go live. However, the DAM and the Data Permissions Matrix for GES will remain separate when REC v3.0 goes live. Data access permissions related to gas remain out of scope of the Change Proposal.

1.2 PROBLEM STATEMENT

There is currently a lack of clarity regarding the data items that should be accessible by each EES User Category and there are potentially some instances where restrictions have been placed on the accessibility of some data items that cannot be justified.

The Data Access Matrix does not currently provide a single standardised role-based framework for EES Users' access to data. This means that the EES Provider cannot provide EES Users with the appropriate access for their role. This may result in operational issues for new entrants to the market and parties wishing to amend their API access arrangements.

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1.3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As an Electricity Consumer, I want data associated with my electricity supply to be made consistently available to Market Participants so that I receive the same level of service whoever supplies my electricity or looks after my meter.
MARKET PARTICIPANT USER STORIES	
M1	As an EES User, I want to have access to all the data items appropriate to my EES User Category so that I can operate processes without disruption, to provide a good service to my customers and meet my performance targets.
M2	As the EES Provider I want to have clarity on the data items that I should provide to EES Users appropriate to their role.
M3	As the Code Manager I want Market Participants to have access to appropriate data in EES so they can complete business processes and meet performance targets, while ensuring access to data is subject to appropriate security and controls.

2 PROPOSED SOLUTION

2.1 SOLUTION OVERVIEW

The Code Manager proposes to resolve the issues identified by addressing the following requirements as part of the Change Proposal solution development:

- Application of consistent formatting, to provide a common look and feel when exploring the EES DAM, or the GES DAM (to be introduced in REC v3.0);
- Review existing access arrangements to ensure suitability of EES User Categories outlined in the Data Access Schedule;
- Ensure any proposed access changes meet open data objectives specified by RECCo;
- Present information in clear and concise manner to aid usability and facilitate the access application process; and
- Allow for the alignment of EES access profiles and EES User Categories, to simplify and speed up the application process.

Following the Code Manager review, a draft solution was published for Party Impact Assessment (Party IA), to ensure solution suitability. Following the Party IA, the solution was reviewed and revised to consider the responses received, resulting in an updated ‘final’ proposed solution.

2.2 DRAFT SOLUTION FOR PARTY IMPACT ASSESSMENT

The draft solution proposed changes to EES data access, data presentation and amendments to REC Schedule 12 Data Access.

2.2.1 DRAFT DATA ACCESS CHANGES

The Data Access Schedule defines that access can be via:

- a Community View, where an EES User has access to data for all Metering Points; or,
- a Portfolio View, where an EES User has access for a Metering Point only if it has a specified responsibility for that Metering Point

Current EES access arrangements allow for all EES Users to access data items from outside of their portfolio, regardless of whether a Portfolio View may be acceptable to fulfil its business processes. As such, the draft solution explored limiting certain EES User Categories to a Portfolio View, to ensure alignment with General Data Protection Regulation (GDPR) best practices.

The EES User Categories that were in scope for limiting to portfolio access include the following:

- Metering Equipment Manager (MEM);
- Distribution Network Operator (DNO);
- Data Collector (DC);
- Meter Administrator;
- Meter Asset Provider (MAP);
- Non-Domestic Consumer; and
- Pre-payment Infrastructure Provider.

As the removal of data access had the potential to impact industry business processes, the Code Manager sought clarification of potential impacts through the Party IA. The Party IA requested that respondents highlight business-critical processes, or activities, that are dependent on accessing data outside of EES User's portfolio.

Furthermore, the Code Manager proposed to remove Data Item limitations for the Third Party Intermediary (TPI) EES User Category. TPIs are wholly dependent on receiving customer consent, prior to accessing EES data. As all access is dependent on consent, there is no requirement for further limitations.

2.2.2 DRAFT DATA PRESENTATION CHANGES

The Code Manager proposed to remove all single organisation EES User Categories (such as Alt Han Company) from the DAM, to reduce the size and complexity of the matrix. Where single organisations are specified within the Data Access Schedule, there will not be any further organisations applying for EES access under that EES User Category. As such, the Code

Manager believes this does not need to be presented within the DAM but should be made available to interested parties upon request, to ensure transparency.

Following confirmation of the DAM contents, the Code Manager proposed that a dynamic form is added to the matrix. The dynamic form will present DAM information in a clear and concise format, to assist users in understanding what EES access can be applied for under certain EES User Categories.

The Code Manager proposed including Electricity Market Reform Settlement Limited (EMRS), as an EES User Category. EMRS is currently an EES User, which is not suitably defined within existing EES User Categories.

2.2.3 DRAFT LEGAL DRAFTING

The DAM changes are supported by amendments to the legal text in the Data Access Matrix Schedule.

- An additional paragraph is proposed to be introduced in Section 4 to support the limitation of EES User Categories presented in the DAM to those which have the potential for multiple company groups:

4.4 For each EES User Category, the Data Access Matrix must specify:

(a) the Data Item(s) (if any) for which an EES User has access for all Metering Points (known as 'Community View'); and

(b) the Data Item(s) that each EES User can access for a Metering Point only if it has a specified responsibility for that Metering Point (known as 'Portfolio View').

4.5 Where an EES User Category relates to a single organisation (such as Alt HAN Company), access is granted based on role requirements and may not be reflected within the Data Access Matrix.

4.6 The Data Access Matrix may include other conditions, where applicable.

4.7 The Code Manager shall publish the Data Access Matrix, and any changes to it, on the REC Portal.

- The introduction of Electricity Market Reform Settlement Limited (EMRS) to the Data Access Schedule as a standalone EES User Category:

4.3 The EES User Categories, which shall be maintained in the Data Access Matrix, are as follows:

……..

(n) Electricity Market Reform Settlement Limited (EMRS);

And,

5.3 The authorised purpose for each category of EES User is as follows

……..

(n) Electricity Market Reform Settlement Limited (EMRS) – for the purpose of fulfilling its role in the Capacity Market and Contracts for Difference scheme;

2.3 IMPACT ASSESSMENT

2.3.1 PARTY IMPACT ASSESSMENT

Development of the solution has been informed by a Party IA which was published on 01 April 2022 and went out to all EES Users (REC Parties and non-REC parties).

A total of five responses were received from REC Parties. They were a mix of Energy Supplier, Metering Equipment Manager (MEM) and Distribution Network Operator (DNO). The Party IA was sent to all Master Admin Users, but no responses were received from non-REC Parties. Meter Asset Provider and Data Collector views were represented within Energy Supplier and MEM responses.

The responses were broadly in support of the data presentation and legal text changes, however there was universal opposition to the proposal to limit certain EES Users to a Portfolio View. Respondents provided detailed evidence that limiting EES access to a Portfolio View would severely impact their ability to perform issue resolution activities, perform emergency works and handle Consumer complaints.

The full detail of the Party IA responses can be found in the Appendices.

2.3.2 SERVICE PROVIDER IMPACT ASSESSMENT

A Preliminary Impact Assessment (PIA) was sought from the EES Provider. A Detailed Impact Assessment is currently being progressed to understand the solution and costs to apply the permissions captured in the DAM within the EES system. The solution looks to change the EES system code so that an access template can be defined per EES User Category and data access controls are based on the category that a company belongs to. The EES technical solution will not have any impacts on the DAM itself and how the permissions are presented in the matrix or legal drafting.

2.4 FINAL PROPOSED SOLUTION

The Party IA provided sufficient evidence for the Code Manager to alter elements of the proposed solution. Alterations will be limited to the data access changes and will not impact the proposed data presentation, or legal text changes.

2.4.1 DATA ACCESS CHANGES

All Party Agent roles are to maintain a Community View within EES, as evidence provided of legitimate business requirements for accessing the data. The Code Manager proposes to continue applying portfolio access restrictions to Non-Domestic Consumers, as no evidence was provided to justify a Community View.

No evidence was provided through the Party IA in opposition of the proposed TPI changes. As such, the Code Manager will include the removal of data item limitations, as all TPI access is dependent on consent.

2.4.2 DATA PRESENTATION CHANGES

After further consideration the Code Manager believes that EES User Categories 'Local Authorities' and 'HMRC, UK Police Forces and other Law Enforcement Agencies' should be represented as a Portfolio View within the DAM.

For the avoidance of doubt, this is not a change to data access. Currently, both EES User Categories have category conditions, which restrict data access to specific postcodes. Shifting from category conditions to a Portfolio View to maintain the postcode restriction is to simplify and improve usability of the DAM.

No other alterations are proposed to the draft data presentation changes.

The draft Data Access Matrix can be found in the Appendices.

2.4.3 LEGAL TEXT CHANGES

No alterations are proposed to the draft legal text changes.

Details of the redlined Schedule changes can be found in the Appendices.

2.5 DATA PROTECTION

The DAM is a key element of the EES data governance. The Code Manager has therefore considered data protection responsibilities associated with the proposed solution. The DAM is a reflection of the Access Agreements already in place and the Code Manager is satisfied that the pre-existing data protection assessments cover the changes made under this proposal.

2.6 EES SOLUTION

The Service Provider Preliminary Impact Assessment (PIA) was completed on 31 May 2022. It included two technical solution options:

- Solution 1 – Utilises the current EES structure, by applying data item limitations to REC Parties at a company level. Each company group in EES will have a singular EES User Category applied to it.
- Solution 2 – Solution option 2 requires a restructuring of EES, removing company group level access controls and applying EES User Categories on a user-by-user

basis. The true application of access controls at a EES User Category basis mitigates the risk of inappropriate access being applied to certain users through errors. Furthermore, it removes the issue of users having multiple EES User Categories applied to a singular company group.

Following receipt of the PIA the REC Code Manager determined that solution option 2 would be progressed as it will provide the following benefits:

- Provides greater flexibility in applying future EES User Category changes;
- Removes current and future risk of variation within the EES User Category; and
- Increase the speed of onboarding new EES User applications.

3 NEXT STEPS

Based on the EES solution set out above in 3.4.1, approval for the costs of completion of the Detailed Impact Assessment (DIA) has been sought from RECCo. A DIA from the EES Provider will be requested on 27 June 2022.

The Code Manager plans to return to the RECTEP for consideration of the DIA response on 27 July 2022. This is based on the Change Proposal Plan that was approved by RECCP on 21 June 2022.

4 PROPOSED IMPLEMENTATION APPROACH

PROPOSED IMPLEMENTATION DATE	04 November 2022

PROPOSED IMPLEMENTATION APPROACH	PHASED APPROACH

The Code Manager believes it is appropriate to have a phased implementation for this Change Proposal, which will see the DAM published in EMAR on the date of implementation, followed by a period of technical development by the EES Provider to apply the alignment of EES User access within the EES system. This means that the DAM can be used as the reference point for access being granted and maintained at the earliest opportunity. This is required by the Code Manager and the EES Provider to support the efficient application of operational processes in regard to EES access.

All EES System Changes are anticipated to be completed outside the normal release window, as they are concerned with back-end system changes. All REC document changes are proposed for the 04 November 2022 release.

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5 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A1	The method of access to EES data (GUI, API, reports, etc) is not determined by the Data Access Matrix	Method of retrieval should not impact the available data.	Open - EES Service Provider to confirm as part of the Detailed Impact Assessment
A2	Where an organisation has access as a Non-Domestic Consumer but may also qualify for access under a different EES User Category, their category will be confirmed to the EES Provider.		Open – Code Manager to confirm prior to implementation
A3	The transition of EES Users to new EES User Categories will not impact the EES service		Open - EES Service Provider to confirm as part of the Impact Assessment

6 APPENDICES

- APPENDIX A - DRAFT DATA ACCESS MATRIX
- APPENDIX B - DATA ACCESS SCHEDULE REDLINING
- APPENDIX C - R0022 CONSOLIDATED IA RESPONSES CONFIDENTIAL