

Final Modification Report

At what stage is this document in the process?

IGT155:

Adding the Retail Energy Code Company as a new User type to the Data Permissions Matrix



Purpose of Modification:

The Retail Energy Code Company (RECCo) are responsible for ensuring the proper, effective, and efficient implementation and ongoing management of the Retail Energy Code (REC). In addition to other industry data sources the UK Link system will provide a logical and efficient source of data to support this objective. This Modification seeks to amend the UK Link Data Permissions Matrix (DPM) to add the Retail Energy Code Company as a new User type.



Panel consideration is due on 23rd July 2021

The Panel determined that this self-governance modification be implemented.



High Impact:

None identified



Medium Impact:

None identified



Low Impact:

CDSP, Shipper Users, Transporters and UNC



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Any questions?

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Timeline

Modification timetable:

| Initial consideration by Workgroup | N/A |
|---|----------------------------|
| Workgroup Report presented to Panel | 28 th May 2021 |
| Draft Modification Report issued for consultation | 28 th May 2021 |
| Consultation Close-out for representations | 21st June 2021 |
| Variation Request presented to Panel | N/A |
| Final Modification Report available for Panel | 7 th July 2021 |
| Modification Panel decision | 23 rd July 2021 |
| | |



1 Summary

What

The Retail Energy Code Company (RECCo) are responsible for ensuring the proper, effective, and efficient implementation and ongoing management of the Retail Energy Code (REC). In order to perform this activity, a Code Manager will be appointed from time to time by the RECCo and as such this party will need to have access to the data that is permitted to the RECCo within the DPM. Reporting services will be provided by Xoserve as a third party service under the DSC. The third party services contract between Xoserve and RECCo will reflect the requirement for data to be shared with the RECCo appointed Code Manager as and when required to perform its obligations under the REC. As an example of an expected use case, a function of the Code Manager is Performance Assurance which will monitor the performance of the REC parties. The UK Link system provides a logical source for reporting to support assessment of a number of activities that are defined in the REC, such as metering and meter reading and also, until implementation of the Central Switching System, potentially registration. The REC Code Manager has recently been appointed so is still developing the Performance Assurance reporting framework but intends to have this defined and established ready for Retail Code Consolidation (REC v2) in September 2021. Whilst it is proposed that the RECCo is added to the REC v2 Significant Code Review (SCR) for the Ofgem Switching Programme, this will not take effect until September 2021. In order to support the development of these reports, and any other use cases, the RECCo needs to be added to the DPM prior to September 2021

Why

In line with IGT UNC Legal Text implemented for IGT UNC Modification 115 (Update to IGT UNC to formalise the Data Permissions Matrix), a new Modification is needed to add a new User type to the DPM. Currently, the CDSP does not have the permissions to release data to RECCo, which would mean that any data that is required would need to be sourced from satellite systems held in individual organisations rather than provided from a single consistent source.

How

This enabling Modification proposes to add the RECCo to the DPM. Where a need to access UNC Protected Information is identified by the RECCo, for themselves or the Code Manager as their contractors, each instance will be assessed by Xoserve against the DPM and DPM Conditionality Document. If the request is for data that is additional to that permitted within the DPM, a DRR will be raised for approval by DSC Contract Management Committee. The third party services contract between Xoserve and RECCo will reflect the requirement for data to be shared with the RECCo appointed Code Manager as and when required to perform its obligations under the REC. The process for requesting access by RECCo and/or a RECCo Code Manager has yet to be defined but the principal will be that should a request from a RECCo Code Manager be received directly, Xoserve will assess as if it were a request from RECCo and as such it should demonstrate the REC obligation the request sets out to achieve and RECCo will be asked to confirm the request should this be in question.



2 Governance

Justification for Urgency, Self-Governance or Fast Track Self-Governance

This enabling Modification is proposed as self-governance as it will not have a negative effect on consumers, it will not discriminate between classes of parties within the UNC, nor will it impact competition.

Requested Next Steps

This Modification should:

- be considered a non-material change and subject to self-governance.
- be assessed by a Workgroup.

It is believed that this Modification can be finalised within a maximum of two Workgroups as the principle described in this Modification are well established and has been set out in a number of Ofgem consultations.

3 Why Change?

Separately it was planned that RECCo would be added to the DPM as part of the UNC changes under the Significant Code Review for Retail Code Consolidation (REC v2). Since this will not take effect until 1st September 2021 this Modification now proposes to do so in advance of this date to support transition to these arrangements. In order for the RECCo to prepare for REC v2 Go Live when the Performance Assurance regime within the REC takes effect, the CDSP has been asked to support the development of the reporting with the Code Manager. In order to effectively develop these reports, permission is required to share the reporting, including actual data, with the RECCo. If the data cannot be made available, it is likely to compromise the effectiveness of the REC reporting framework. Once RECCo are recorded on the DPM we anticipate that further use cases will be identified for provision of data. These will be managed through the DSC Contract Management procedures. The DPM is the framework that permits the CDSP to release data to specific named parties. In order to add a party to the DPM a IGT UNC Modification is required, see IGT UNC Part K Clause 24.6.2.

4 Code Specific Matters

Reference Documents

The Data Permission Matrix (which includes the Conditionality Document) is published on Xoserve.com.

Knowledge/Skills

None identified.



5 Solution

This Modification will add the Retail Energy Code Company to the Data Permission Matrix. For the avoidance of doubt, report requests to access UK Link Data are managed through the DSC Contract Management Committee and are not included in the scope of this Modification. The third party services contract between Xoserve and RECCo will reflect the requirement for data to be shared with the RECCo appointed Code Manager as and when required to perform its obligations under the REC.

6 Impacts & Other Considerations

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

As referenced above this Modification is linked to the Ofgem Switching Programme SCRs. This will add the Retail Energy Code Company to the DPM in advance of, but consistent with, the changes in the Significant Code Review.

Consumer Impacts

Data relating to all consumers groups would be available if specified in the reporting and sanctioned by DSC Contract Management Committee.

| Impact of the change on Consumer Benefit Areas | | |
|--|-------------------|--|
| Area | Identified Impact | |
| Improved safety and reliability | None | |
| Lower bills than would otherwise be the case | None | |
| Reduced environmental damage | None | |
| Improved quality of service | Positive | |
| Benefits for society as a whole | None | |



Cross-Code Impacts

As referenced, this will provide data that is collated and mastered under the UNC to the Retail Energy Code Company. An equivalent UNC Modification has been raised, 0762. The Workgroup Report for this Modification is due to be reviewed by Panel at the May 2021 meeting.

| UNC | Х |
|-------|---|
| REC | |
| Other | |
| None | |

Environmental Impacts

No environmental impacts envisaged as a result of this Modification.

7 Relevant Objectives

| Impact of the modification on the Relevant Objectives: | |
|---|-------------------|
| Relevant Objective | Identified impact |
| (A) Efficient and economic operation of the pipe-line system | None |
| (B) Co-ordinated, efficient and economic operation of | None |
| (i) the combined pipe-line system; and/or | |
| (ii) the pipe-line system of one or more other relevant gas transporters | |
| (C) Efficient discharge of the licensee's obligations | None |
| (D) Securing of effective competition: | None |
| (i) between relevant shippers; | |
| (ii) between relevant suppliers; and/or | |
| (iii) between DN operators (who have entered into transportation agreements with other relevant gas transporters) and relevant shippers | |
| (E) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers | None |
| (F) Promotion of efficiency in the implementation and administration of the Code | Positive |
| (G) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators | None |



This Modification provides a more efficient means for the CDSP to release data to the RECCo consistent with the principle of development of the DPM. This is consistent with other similar changes for the release of Data to identified organisations listed in the DPM, with the actual data to be released to be agreed via the process established by the DSC Contract Management Committee and therefore further Relevant Objective f) Promotion of efficiency in the implementation and administration of the Code.

8 Implementation

As self-governance procedures are proposed, the Modification could be implemented in the next scheduled release. Implementation should be as close to the UNC equivalent Modification, 0762 as possible which is likely to be around sixteen business days after a Panel decision. The IGT UNC Panel should be pragmatic in its decision on implementation dates as, at a minimum, this Modification would be required to be implemented before 1st September 2021 when REC v2 is scheduled to go live.

9 Legal Text

As this is an enabling Modification, no Legal Text is required to be provided by Transporters. This Modification has been raised in accordance with IGT UNC Part K, Clause 24.6.2 which stipulates that to add a User type to the DPM, the change must be approved by way of IGT UNC governance. Accordingly, the IGT UNC would not be modified by implementing this proposal, the only change resulting from implementation would be to add a new column in the DPM, headed with the new User type.

10 Consultation

Panel invited representations from interested parties on 28th May 2021 for a consultation period of 15 Working Days.

The summaries in the following table are provided for reference on a reasonable endeavours basis only. We recommend that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

| Representations were received from the following parties: | | | |
|---|----------|------------------------|---|
| Organisation | Response | Relevant Objectives | Key Points |
| Scottish Power Energy Retail Ltd | Support | F - positive | Agree with proposal set out in Modification. Agree this is a small change and should be self-governance. Agree with Relevant Objectives set out in Modification. Agree with proposed date before 1st Sept 2021. |
| BUUK | Support | F - positive | BUUK supports the proposal to include the Retail Energy Code Company as a new user type to the Data Permissions Matrix. We recognise that this is essential in assisting the REC Code Manager in their |



| | | | Performance Assurance role. We see no reason why this proposal should not be progressed as a Self-Governance modification. We agree with the proposer that Relevant Objective F will be met by the implementation of this change. We see no reason why this change, should it be successful, should not be implemented at the next scheduled release, to align with the UNC equivalent modification – 0762. We recognise that there is no legal text requirement to this enabling modification. |
|------------------|---------|--------------|---|
| Indigo Pipelines | Support | F - positive | We accept that RECCo will need access to IGT data in UKLink, in order to perform its obligations under REC, in particular Performance Assurance reporting. We agree with the proposer that this modification should be progressed as Self-Governance. |
| | | | Supports Objective F, in so far as it provides an efficient way of authorising the release of data to RECCo. |
| | | | Implementation should aim to align with UNC equivalent Mod 0762 and be in place in time for REC v2.0 go live, which is expected to become effective from 1st Sept 2021. |
| | | | No Legal text required as the DPM sits out with IGT UNC. |

Additional Information

The UNC equivalent Modification 0762S will be implemented on 12th July 2021. The notice of implementation for this change can be found here.

11 Panel Discussions

Discussion

The Code Administrator summarised the Consultation responses noting that all responding parties supported the modification and agreed the solution positively met Relevant Objective F.

The Chair took the Panel through each section of the modification to ensure they were comfortable with the detail as presented. The Panel did not voice any opposing views to this Modification and agreed with the solution presented.

Panel confirmed they had no concerns, and that the modification should proceed to vote.

Consideration of the Relevant Objectives

All Panel members agreed that this Modification meets the criteria set out in Objective F.



Determinations

The vote was carried out with One Pipeline User and three Pipeline Operators (please note that this meeting was held as a Reconvened meeting, as per Part L6.10 of the IGT UNC where current quoracy rules do not apply). The Panel decided that the Modification should be implemented by a unanimous vote.

12 Recommendations

Panel Determination [Self-Governance]

Members agreed:

• that Modification 155 should be implemented