RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	Final Recommendation

CHANGE REPORT

R0201 – CREATION OF TOOL TO MANUALLY CORRECT ERDS / CSS DISCREPANCIES

DOCUMENT VERSION	1.0
PROPOSED IMPLEMENTATION DATE	TBD
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	CHANGE PANEL	CHANGE PATH	SELF-GOVERNANCE
PRIORITY STATUS	HIGH	URGENCY	STANDARD
IMPACTED STAKEHOLDERS	ENERGY SUPPLIERS, METERING EQUIPMENT MANAGERS, ERDS PROVIDER, CSS PROVIDER		

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OVERVIEW

This Change seeks to create a new tool to allow the manual correction of data discrepancies in the Electricity Retail Data Service (ERDS) and Central Switching Service (CSS) systems, post Market-Wide Half Hourly Settlement (MHHS)implementation.

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CONTENT

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BACKGROUND

1 SUMMARY

Distribution Network Operators (DNOs), in their role as an Electricity Retail Data Agent (ERDA) currently use a tool to manually update Supplier Registration data to reflect the correct Supplier Registration with the correct Effective From Date, however, during Market-Wide Half Hourly Settlement (MHHS) design discussions, concerns were raised regarding the lack of a manual correction mechanism.

Current Position

The Central Switching Service (CSS) is the master of Supplier Registration data e.g. the Supplier responsible for the Metering Point. CSS and Electricity Retail Data Service (ERDS) discrepancies can arise where the secured active or cancellation notification is not issued by CSS (missing messages) or the secured active notification is not accepted by the ERDS.

Where issues arise, there is currently no mechanism for Supplier Registration data to be retrospectively corrected therefore manual correction is required.

In addition to the tool used by DNOs to manually update Supplier Registration data, Energy Suppliers appoint Supplier Agents bilaterally; however, details will not be captured centrally until the ERDS has been corrected. A D0204/ MM00107 Market Message is sent (from ERDS) to inform the Energy Supplier of the changes and a D0209/ MM00109 Market Message to notify the Data Aggregator and Elexon Central Systems.

It is understood that there are currently approximately 100 manual corrections per month (across all DNOs). Note that this mechanism is not defined within the REC.

As the Supplier Registration is applied retrospectively, the Effective From Date is aligned across ERDS and CSS. Any correction will be captured through the next settlement run.

MHHS Position

The Switching Arrangements are based on the principle that CSS is the master of Switching Registration data, therefore all Switching Data Service Providers should reflect the Supplier Registration held by the CSS.

Pre-MHHS, there is a mechanism in place to ensure that missing Supplier Registrations are reflected in ERDS should the systems become misaligned (as per current position above). MHHS doesn't replicate this mechanism therefore there is no manual work around to correct data.

Under MHHS arrangements a missing Supplier Registration will prevent Supplier Agents from being appointed. From a REC perspective this relates to Meter Operator Agents (MOAs) and would prevent metering activity from being carried out. This is a known exception which occurs regularly today, with DNOs reportedly being required to correct several hundred of these exceptions each month. Any delay in implementing a mechanism to correct these exceptions for

MHHS Migrated Metering Points will therefore result in an increasing backlog of erroneous switching data in the DNO's Supplier Meter Registration Service (SMRS).

Whilst MHHS CR-045 'Supply Start Date (SSD) Correction Tool' covered additional messaging to Parties to de-appoint erroneous agents and to inform Market Participants of the revised Supplier Registration, these are out of scope for the REC and would therefore expect an equivalent change to be progressed under the BSC to include these changes.

Should the REC change be implemented without the changes to SMRS requirements, it would be expected that the missed Supplier Registration would become effective retrospectively and the Supplier to appoint the required Supplier Agents without relying on the MHHSP IF-001 Notification of Change of Supplier. The supplier should be aware of the Registration based on CSS messages and would likely be managing lapsed Supplier Agent appointment requests. However, this would not enable settlement data to be corrected.

The MHHS Programme, in conjunction with St Clements have identified a solution to address the issue and raised CR-045. Based on the limited time available before M10 (the implementation of MHHS system changes), CR-045 was rejected, however it was noted that parties were supportive of the change and agreed that it should be passed to code bodies to deliver through the BAU change processes.

2 PROBLEM STATEMENT

There are instances where ERDS (and SMRS under BSC governance) can be misaligned with the CSS and under the MHHS arrangements there is no mechanism for manual correction which there is in place today. From MHHS go live the Supplier will not be able to appoint their preferred agents. This issue only applies to MHHS Migrated Metering Points as the existing mechanism for manually correcting data would be used if the issue related to a non-migrated Metering Point.

In the event that the Supplier cannot appoint its agents, this may prevent the Supplier from accurately billing the Consumer.

The potential impact will increase as MHHS Migration continues, with more MHHS Metering Points potentially impacted by any CSS / ERDS discrepancy.

3 IMPACTS

CONSUMERS
Electricity

REC SERVICE PROVIDERS
CSS Provider
ERDS Provider

RECCO / REC CODE MANAGER
REC Performance Assurance (RPA)

REC PARTIES AND SERVICE USERS
DNOs
Energy Suppliers

REC DOCUMENTS / PRODUCTS
ERDS Service Definition
Schedule 14 – Metering Operations
Performance Assurance Reporting Catalogue (PARC)

MHHS DESIGN
No impact

MHHS DATA SPECIFICATION
No impact

MHHS CODE DRAFTING
Indirect impact - ERDS Service Definition

The REC Performance Assurance Team assessed this proposal against the Performance Assurance Framework (PAF) and other related processes and have highlighted that they believe it will have an impact on the services provided by RPA due to impacts on Retail Risk 13 - Retail consumers have a negative consumer experience as part of the metering works conducted.

4 CROSS CODE IMPACTS

The ERDS (governed under the REC) and Supplier Meter Registration Service (SMRS) (governed under the BSC), use the same underlying, Metering Point Registration System (MPRS). Therefore, this misalignment also applies to SMRS.

A change in the REC can only cover the correction of data within ERDS. A BSC change will need to be raised to deliver the CR-045 proposed changes.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**01-Aug-24**	**31-Oct-24**
	Solution Development	Aug	Aug
	Impact Assessment	September	October
	Solution Refinement	October	October
Change Proposal		**25-Oct-24**	**25-Oct-24**
	Business Case Assessment	October	October
	Update Responsible Committee	November	November
	Consultation	November	November
	Final Determination	November	December
Voting		**17-Dec-24**	**17-Dec-24**

6 STAKEHOLDER ENGAGEMENT

This change was presented at the Change Issue Group on the 01 August 2024 under MHHS CR-045, to consider the solution in the REC and whether it should be reliant on an aligned progression with an associated BSC Change. Discussions have started between RECCo, Elexon, the MHHS Programme and St Clements and being shared at the Cross Code Steering Group (CCSG) for information. It was also presented for discussion at the Technical Change Workshop on 20 August.

Energy Suppliers, DNOs and Service Providers have been identified as impacted by this proposal. A 15 Working Day (WD) Party Impact Assessment will be issued in September, to give impacted Market Participants and Service Providers sufficient time to assess the proposed solution and respond to the impact assessment.

A preliminary assessment will be carried out following the Impact Assessment, this will consider Impact Assessment responses and the case for change to develop the Code Manager's recommendation. The Code Manager will present an updated Change Report following their preliminary assessment, to the Responsible Committee, ahead of issuing for a 15 WD Consultation.

7 PRIORITY STATUS AND URGENCY

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	1	27	27
	Retail Markets Impact	Retail Risk(s)	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	3	14	43
Resource	Complexity / Effort / Duration		2	9	18
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		2		17
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	2	10	20
				Overall Priority Score (rounded)	163

Priority Status	HIGH
Change Proposal Type	STANDARD

SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

This issue was initially discussed by the MHHS Programme with CR-045 raised and impact assessed. Following CR-045 being rejected it was agreed that it should be passed to code bodies to deliver through the change processes at the earliest feasible implementation date.

The MHHS Programme have worked with St Clements and to identify a solution to address the issue.

Whilst the REC change can place an obligation on the ERDA to correct data, a parallel BSC change is also required to introduce the new business process elements, with Data Integration Platform (DIP) Market Messages issued to participants once the registration data is corrected.

9 PROPOSED SOLUTION

The current mechanism for manual correction of Supplier Registration data is not defined in the REC. Therefore, given the position set out within the MHHS Design which prevents this data being updated retrospectively, changes are proposed to the ERDS Service Definition and Schedule 14 – Metering Operations.

The transition to MHHS arrangements increases reliance on information held by the ERDS within the Registration Service systems. Misalignment of data between CSS and the Registration Service systems increases the risk that on a switch, an appropriate MEM is not appointed to the Metering Point on time leading to issues impacting the Consumer. To monitor and manage this risk, high-level reporting requirements for performance assurance are being developed. The ERDS Provider will be required to report on the instances of data alignment identified during a period for risk monitoring. The specific requirements such as the format, template or frequency of the report will be specified as the PARC changes are developed, however an indicative summary of the expected reporting requirements has been provided.

In addition, DNOs will be required to implement the tool by the implementation date of this proposal. On an ongoing basis DNOs will be required to actively identify and resolve discrepancies.

A solution development report can be found here.

10 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0201, will be provided prior to Impact Assessment, following the MHHS Programme baselining of the code drafting (programme milestone M6).

11 KEY RISKS ISSUES ASSUMPTIONS AND DEPENDENCIES

11.1 RISKS AND ISSUES

NO.	RISK	NOTES	MITIGATION
R1	DNOs will not implement the tool by the implementation date of this proposal.		Obligation to be defined in the legal text.

R2	DNOs will not actively identify and resolve discrepancies.		Obligation to be defined in the legal text.

NO.	ISSUE	NOTES	HOW TO PROGRESS
I1	Market Participants have previously raised concerns with implementation of this change before M10 due to MHHS design, build and test priorities.	The Programme don't share individual IAs publicly. However, the CR-045 Impact Assessment Report gives a summary of the responses.	Closed

11.2 ASSUMPTIONS AND DEPENDENCIES

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A1	There is no need for end-to-end testing and will rely on internal (PIT) testing at the DNO.	RECCo suggested at the Change Issue Group that they did not expect this change to require end-to-end testing. The Energy Software Solutions representative agreed, suggesting that a key issue with CR-045 had been testing on a market-wide scale.	To be validated during Impact Assessment, in order to clarify issues around new event codes and testing.
A2	Elexon can process the retrospective messages as they have no validation on these.		To be confirmed by Elexon
A3	Programme milestone M6, will be met on the 23 August 2024.		To be validated by the MHHS programme M6 decision.
A4	Pre work carried out, not by the Code Manager is accurate.		To be validated during Impact Assessment.

NO.	DEPENDENCY	NOTES	STATUS
D1	The parallel BSC change should be considered. Whilst it may be feasible to implement the REC CP independently, delivery efficiencies may be gained with parallel implementation.		The BSC plan to take their Change Proposal to the relevant committee early September and will look to align Impact Assessments.

12 APPENDIX

CHANGE PROPOSAL	Link
SOLUTION DEVELOPMENT REPORT	Link
RECCO OVERVIEW SLIDES	Link

13 GLOSSARY

TERM	DEFINITION
Central Switching Service	means the Systems and processes provided or procured by the CSS Provider for the purpose of providing the Address Management Service and the Registration Service.
Data Aggregator	means the person Appointed by an Electricity Supplier to aggregate consumption data for an RMP as further described in the Balancing and Settlement Code.
Electricity Retail Data Service	means the electricity registration services provided under this Code to support the provision of electricity retail data to the CSS and other services.
Metering Point Registration System	means the System used or procured by each DNO in order to provide the Electricity Retail Data Service in accordance with the REC and / or the Interpretations and Definitions 59 Copyright 2024 Retail Energy Code Company Supplier Meter Registration Service in accordance with the BSC.
Registration Data	means the data recorded in relation to a Registration.
Secured Active	means the Registration Status as described in Paragraph 1.4 of the Registration Services Schedule