



**National Change**

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**Date**

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Dear Switching Programme

**Retail Energy Code v2.0 and Retail Code Consolidation**

I am writing on behalf of Western Power Distribution (South Wales) plc, Western Power Distribution (South West) plc, Western Power Distribution (East Midlands) plc and Western Power Distribution (West Midlands) plc in response to the above consultation.

This response is not confidential.

Yours sincerely

Gemma Slaney  
National Change Manager

## Consultation Response

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### General Comments

There is an inconsistency on the title pages of the Schedules. Some have the word 'Schedule' on the end of the title, for example 'Interpretations Schedule', where others don't, such as 'Data Access'. We feel these should be consistent.

Please note that on the spreadsheet we have created additional tabs for our comments on the SDES Service Definition, SEC Section A and SEC Section D.

Whilst not specific to this consultation, we have raised with SECAS whether it would be acceptable to update the term 'Inventory Enrolment and Withdrawal Procedures' in SEC section B2.10, to 'Inventory Enrolment and Decommissioning Procedures' as the document has been renamed but this section was missed and this consultation seeks to amend that section of the SEC.

### **Question 2.1: Do you agree with our proposed approach to information security and data protection assessment under the REC? In particular, do you agree with the requirement for all REC Service Users to notify the Code Manager of a security breach?**

We agree with the proposed approach to information security and data protection. We support the Code Manager providing a framework and guidance for users. This approach appears similar to that under the SEC which we feel works well. Paragraph 11.7 of the Qualification and Maintenance Schedule details the requirement for users to notify the Code Manager of any security breach that could compromise the security or integrity of any REC Service or other REC Service Users. Could this be too vague? Does there need to be detail around what type of security breach needs notifying to the Code Manager? For example SEC states Major Security Incident? Paragraph 9.6 in the Green Deal Arrangements Schedule also appears to be more explicit.

### **Question 2.2: Do you agree with our proposal to extend entry qualification to new gas MEMs? If not, please explain why.**

No comment – relates to gas.

### **Question 2.3: Do you agree that the change effected by MAP CP 0338 should apply equally to gas?**

No comment – relates to gas.

### **Question 2.4: Do you agree that the clarification on the applicability of the schedule to non-domestic suppliers sufficiently gives regard to non-domestic suppliers who do not serve prepayment customers?**

No comment – relates to Prepayment

### **Question 2.5: Do you agree that the approach and processes for gas unregistered sites should be standardised, as set out in the Unbilled Energy Code of Practice?**

No comment – relates to gas.

**Question 2.6: Do you agree that the REC should make provision for the PAB to consider the case for reconciliation of data held by PPMIPs and CDSP for the purpose of identifying unregistered sites? If so, do you agree that this process should sit in the Unbilled Energy Code of Practice?**

No comment – relates to PPMIP.

**Question 2.7: Do you agree with the principle that a consumer should be no worse off by virtue of a theft investigation being undertaken by a network company rather than a supplier?**

The Unbilled Energy Code of Practice needs to be written so as to not conflict with DNO's licence obligations, including Standard Licence Conditions 'Electricity Distribution Losses Management Obligation and Distribution Losses Strategy' 49.7 and 49.8. We also feel that supplier licence obligations should be considered and think that the Unbilled Energy Code of Practice should refer any recovery of cost associated with theft, to the DNO or Supplier licence requirements.

**Question 2.8: Do you agree that the requirements relating to provision of customer contact details should apply equally to non-domestic suppliers, as set out in the Transfer of Consumer Data Schedule?**

Whilst we understand these requirements and are minded to support them, we wish to emphasise that we believe that no information is preferred to incorrect information. We understand that this is addressed in the schedule under Paragraph 4.4 and this also supports the principles of GDPR.

**Question 2.9: Do you agree with our proposal to extend 'Gas use case 5: Payment of Guaranteed Standard of Performance Payments' to cover voluntary payments?**

No comment – relates to gas.

**Question 2.10: What risks (if any) do you foresee in the transfer of processes associated with Commissioning, Complex Sites, Proving and Faults from BSCP514 to the REC Metering Operations schedule?**

We do not foresee any risks in the transfer. We would agree that out of the three options proposed, Option 3 to move the SVA into the REC and keep CVA processes in the BSC appears to be the most sensible approach. Concerns had been raised by Supplier agents some time ago when it was proposed that some processes such as CoP4 could be straddled across both BSC and REC. We believe that Option 3 has recognised these concerns and addressed them. We would also highlight that this would be an ideal opportunity for the industry to review the CVA processes as they are long overdue.

**Question 2.11: Do you agree that requirement to comply with the BSC CoPs should be placed directly on MEMs in the REC? If not, please explain your reasons.**

We are supportive of the compliance of the BSC CoPs being placed directly on MEMs in the REC, however, this would be subject to the outcome of the planned review of the BSC CoPs and any changes that may be proposed as a result.

**Question 2.12: Do you agree that metering operations rules and processes in the REC could be assured by the BSC, particularly with regard to PARMs reporting and technical assurance audits, until the assurance function can transition to the REC? If not, please explain your reasons.**

We would support the proposal that metering operations rules and processes that are transferred to the REC should still be subject to PARMs reporting and technical audits and this should continue to be assured by the BSC until the assurance function can transition to the REC.

**Question 2.13: Do you agree that the information in the RGMA Baseline relating to exceptions should be out of scope of the mandatory Schedule?**

No comment – relates to gas.

**Question 3.1: Do you agree that the proposed text to embed the Cross Code Steering Group will enable the intended improvements to cross code change? If not, please suggest alternative or additional drafting.**

Although we agree with the intent of the proposed text, we are aware of SEC Modification 88 which was rejected. We are conscious of allowing anybody to raise changes to other codes, and feel that there needs to be parameters set. For example, SECAS can only raise a consequential change as agreed by the Cross Code Steering Group. We also feel that it would benefit to have guidelines around which Code is to be the lead-code to avoid potential bias if a change is more likely to be approved under a certain Code.

We have the following comments on the proposed text. We believe that the definition should be 'Energy Code' rather than 'Energy Codes'. Below we have red lined our views:

(b) determine whether a potential change to one Energy Code is likely to require a parallel or consequential change to another Energy Code(s); and  
(c) where a potential change to one Energy Code is likely to require a parallel change to another Energy Code(s), determine which Energy Code is to be used as the lead-code for the change and which organisation shall raise the consequential change(s) to other code(s).

...

other affected Energy Code(s) so that they can manage the processes under their Energy Codes in parallel with the process under this Code.

...

Where the Cross Code Steering Group determines that another Energy Code is to be used as the lead-code for a [Change Proposal/Modification], then the [insert relevant code term] shall progress that Change Proposal/Modification in accordance with this Code.

**Question 4.1: Do you agree with the assignment of Code Manager ownership (Metadata Owner) of each Energy Market Message within the "Annex D – Message Scenario Variant Catalogue"?**

We would agree with the principles of the assignment of Code Manager ownership of each Market Message within Annex D – Message Scenario Variant Catalogue. The assignment ensures that any changes to any of the data flows will be assigned appropriately.

**Question 4.2: Do you agree with the classification of existing flow notes (including DTC Annex C) to either one of, a rule within the Data Specification, a Guidance Note (managed under the respective code, e.g. a REC Level 3 document) or a process obligation (e.g. a rule within a REC Schedule / BSCP)?**

The current DTC Annex C is defined as the "Rules for the Completion of Data Flows", however, it does contain guidance information as well as obligations on how data should be displayed within a given data flow and the obligation on parties of actions required in respect of that data. Therefore we agree that

DTC Annex C could be split between

- Guidance
- Obligations
- Rules

The concern would be that, if the information is split, issues may arise in following all the requirements in respect of a data flow. However, if the plan is to have a data hub whereby all related rules, obligations and guidance is also displayed when searching and reviewing a data flow, we believe that this would address those concerns.

The DTC Annex B contains the current DTC Data Flows. Within those data flows are flow notes which again have been recorded for the completion and/or use of the flow itself. If the proposal is to move these to a guidance document/rule document/obligation document, would this be done through a change proposal under the REC for each of those Data Flows affected?

**Question 4.3: Do you agree that the data items identified in 'Redundant Data Items for Review' spreadsheet should no longer be represented in the Data Specification as they are not associated to any Market Messages?**

Gas redundant items. No comment