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Rachel Clark  
Programme Director  
Switching Programme  
Ofgem

By email to [switching.programme@ofgem.gov.uk](mailto:switching.programme@ofgem.gov.uk)

29 July 2021

Dear Rachel,

**Retail Energy Code v3.0**

SGN welcomes the opportunity to respond to the above consultation<sup>1</sup>. We note that the Retail Energy Code impacts a variety of parties within the sector. As such, we have responded to the questions posed and commented on the REC Main Body in addition to the Gas Enquiry Service and Data Access Schedule which are relevant to SGN as a Gas Transporter.

Should you require any further information with regards to our response then please do not hesitate to contact me at [Sally.Hardman@SGN.co.uk](mailto:Sally.Hardman@SGN.co.uk)

Yours sincerely,

Sally Hardman  
Regulatory Process Manager  
SGN

<sup>1</sup> [https://www.ofgem.gov.uk/publications-and-updates/switching-programme-significant-code-review-retail-energy-code-v30?utm\\_medium=email&utm\\_source=dotMailer&utm\\_campaign=Daily-Alert\\_31-03-2021&utm\\_content=Switching+Programme+Significant+Code+Review%3a+Retail+Energy+Code+v3.0&dm\\_i=1QCB,7B8JV,MZ3CC6,TNR69,1](https://www.ofgem.gov.uk/publications-and-updates/switching-programme-significant-code-review-retail-energy-code-v30?utm_medium=email&utm_source=dotMailer&utm_campaign=Daily-Alert_31-03-2021&utm_content=Switching+Programme+Significant+Code+Review%3a+Retail+Energy+Code+v3.0&dm_i=1QCB,7B8JV,MZ3CC6,TNR69,1)

## 2. Proposed updates to the principles document

**Question 2.1: Do you agree that access to data within the GES should be governed under the provisions of the REC?**

SGN supports the view that data accessed via the Gas Enquiry Service (GES) is governed under the Retail Energy Code (REC) provisions set out in the Data Access Schedule and Data Access Matrix.

As a consequence of the current consultation we have amended our view with regard to the Faster Switching Significant Code Review and General Terms D2.6 text, which currently provides the requirement to amend the Data Services Contract (DSC) Data Permissions Matrix to align to that of the REC Data Access Matrix.

We would now propose that this requirement is removed, as the REC schedule obligates Gas Transporters to ensure the CDSP as the GES Service Provider makes available data requested under REC, and therefore amendment to the DSC Data Permissions Matrix is not also required. This would be consistent with the approach currently adopted which does not require permissions where an obligation in Code already exists.

### **UNC data governance under REC**

As previously highlighted, by placing governance of UNC data within REC, any Shipper Mastered Data could be deemed Prohibitive Data and therefore not available to be shared with GES users unless that Shipper is a GES User itself. Where a Shipper organisation also functions as a Supplier, and therefore has acceded to the REC and registered as a GES User this may not present an issue, however there is the risk that any Shipper-only organisations may not have acceded and registered, and as such may be excluded from the governance arrangements of, as well as access to, their own data.

As indicated in the REC Data Access Schedule paragraph 7 *Becoming an Enquiry Service User* and corresponding GES Service Definition Schedule paragraph 2 *Definition of GES User*, Ofgem have indicated that there is no compulsory subscription to the GES service. Although as a Gas Transporter SGN would automatically accede to GES there is no obligation for us to use the service and therefore it would be SGN's intention to continue to utilise our existing provision of the data required to conduct our business via Xoserve in the form of the Data Enquiry Service (DES).

SGN also wish to highlight the drafting of Clause 13 of the REC Main Body. Clause 13.19 (b) indicates that Services Data held within the Central Gas Register (CDSP) shall be owned by the relevant Gas Transporter. We would welcome clarity from Ofgem regarding the expectation and definition of data 'ownership', as central systems data is collected, and derived from a variety of sources, not all of which originate with the Gas Transporters. Furthermore, said data is managed and processed by the CDSP, which is no longer exclusively controlled by the Gas Transporters. As such, Transporters cannot accept liability or ownership in relation to all held data.



### **Consumer access to supplier information**

SGN notes that the 'Find My Supplier' service set out in Gas Transporters' Licence Condition A31 2(e) has not currently been earmarked for transition to REC.

We believe that the 'Find My Supplier' service, which is essentially a retail-facing service, should sit with REC for Gas and potentially Electricity, as this would better serve the consumer and majority of parties to the REC. The REC, as the Supplier Code, would be better positioned to facilitate the efficient and cost-effective delivery of a centralised service. It should be noted that the movement of this service to the REC would require removal of the equivalent obligation from the Gas Transporters' Licence.