



## REC V2.0 – E.ON Response

**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?**

Yes, E.ON agrees with the proposed approach, however we seek further clarification on how parties will need to notify the Code Manager. There is already a process in place to notify the ICO of any security breaches and we therefore don't want to duplicate the work that goes into notifying the Code Manager.

We also seek clarification on which particular breaches the Code Manager will need to be notified of; for example, will the Code Manager only need to be notified of breaches affecting systems overseen by REC?

We take this opportunity to raise a general point following Brexit that any references made to GDPR will need to be amended to UKGDPR.

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

Yes, E.ON agrees with the proposal to extend qualification to new entrants, but we believe this should only happen where new entrants can demonstrate that they fully understand their liabilities and are able to meet them, as failure to do so will impact the customer. We would like to see new entrants' performance monitored more closely to ensure that they continue to meet the correct standards and do not cause additional cost and impact to established parties.

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

Yes, E.ON agrees that the change should equally apply to gas, which aligns with the purpose of REC to align provisions for both fuels.

**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?**

Yes, E.ON agrees with this in principle but also believes that the provisions need to be in place in the event that a non-domestic supplier found itself in the position of supplying a prepayment customer, this will help ensure there is no impact to the customer journey.

**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?**

Yes, E.ON agrees that this should be standardised for both fuels and believe that this will make it fair for all customers on the network.

**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?**

Yes, E.ON partly agrees with this in that the reconciliation of data held by PPMIPs and CDSP should be undertaken, however, we do not believe it should sit within the Unbilled Energy Code of Practice. This



is potentially where supply networks have not registered a consumer and not that the consumer is suspected of energy theft.

**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?**

Yes, E.ON agrees that the customer should be treated equally regardless of whether an investigation is being undertaken by a supplier or network company.

**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?**

Yes, E.ON agrees with the requirements and that they should apply equally to all suppliers. We note however, that non-domestic customers PSR requirements are different to domestic and small business customers so we seek clarification on the circumstances in which information would be shared and for what reasons.

**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?**

Yes, E.ON agrees that voluntary payments should be included so there is a consistent approach across the industry about what is recorded, when and for what reason. However, we seek clarification on what constitutes a voluntary payment and if this is likely to cost parties more than what is already being paid and declared. In addition, what performance metrics will be used to benchmark voluntary payments? We also seek clarification on whether transporters can apply the payments.

**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?**

E.ON foresees a risk in the drafting of code. The provisions on commissioning are moving from the BSC to DCUSA but the provisions on Complex Sites, Proving and Faults is moving to REC. We need to ensure that the drafting of code is completed consistently as there is a clear split between roles of the codes rather than the processes.

**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.**

Yes, E.ON agrees, as this will ensure governance is in place in order to hold MEMs to account.

**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.**

E.ON partly agrees with this; whilst the PARMS reporting can be managed by the BSC in terms of monitoring, we are unclear how the Elexon PAB will be able to take any assurance action as it has no



enforcement powers under the REC. For this reason, we would recommend that the reporting is provided directly to the REC PAB rather than the Elexon PAB.

We also take this opportunity to reflect on the reporting itself as it is currently inaccurate by way of showing false positives in the reporting mechanism, which subsequently means suppliers are given assurance queries on things which haven't actually happened. Whilst we accept that this may be down to a timing issue, we would expect that with the transition to REC, this reporting is improved to become more accurate and should ultimately remove queries being sent to suppliers.

**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?**

Yes, E.ON agrees that this should be out of scope.

However, we seek clarification on the lower level guidance and how this will be applied if it falls outside the scope of the schedule.

**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.**

Yes, E.ON agrees with this in principle but we await sight of the industry change process and how this will be defined through the Cross Code Steering Group. We seek clarity on how parties will engage with REC changes. In addition, we believe that for clarity, the Cross Code Steering Group Membership roles / representatives should be listed within the document.

**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"?**

Yes, E.ON agrees in principle.

**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)?**

Yes, E.ON agrees in principle.

**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?**

Yes, E.ON agrees in principle. However, one aspect for consideration is whether redundant data items should feature within an 'archive section' of the Energy Market Architecture Repository, which we believe will help to communicate message changes as part of the programme.