

Rachel Clark  
Programme Director  
Ofgem  
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LONDON  
E14 4PU

23<sup>rd</sup> February 2021

Dear Rachel,

**Re: Retail Code Consolidation Consultation - The Retail Energy Code - Proposals for Version 2.0**

Thank you for the opportunity to respond to Ofgem's latest Switching Programme consultation.

We note that there is further detail to be made available following output from the newly appointed Code Managers, and we are encouraged to see initial engagement with these parties. Once we see this detail, further comments may arise.

Whilst not covered within this consultation documentation we are keen to see the detailed change processes, performance assurance framework and approach regarding UNC data within the Data Access Schedule. In particular, we are keen to understand the approach to indemnifying DSC parties who are not REC parties. We look forward to the further clarity that will be afforded by the detailed development of these documents, some of which will potentially have a short development timescale prior to implementation.

We have commented previously on areas of the Data Access Schedule that are specific to the Gas Enquiry Service. These have been acknowledged by Ofgem and we understand that these will be considered as part of the V3 consultation. We have comments on the Data Access Schedule which we believe are relevant to both the Gas and the Electricity Enquiry Service, and these are included within the detailed response template.

We highlight that the UNC Consequential changes should be updated to include the Performance Assurance Code Manager within the Data Permissions Matrix. We would propose to make this amendment in the V2 SCR text; but note that given the timescales within which the Performance Assurance Code Manager is seeking to access the UNC Protected Information it is likely that this will need to be considered as part of a separate UNC Code Modification.

Annex 1 contains our responses to the V2 consultation questions which are pertinent to our current role as the gas industry Central Data Services Provider (CDSP) and our future roles as envisaged by the REC proposals.

We look forward to continuing to work with Ofgem, our customers and the wider industry to deliver a successful Switching Programme. In the meantime, if you wish to discuss further any aspect of our response, please do not hesitate to contact me. We are happy for you to publish this response in full.

Yours Sincerely

David Addison  
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## **Annex 1 – Responses to Consultation Questions**

Naturally given our role as the gas industry Central Data Services Provider (CDSP) and our future roles as envisaged by the REC proposals we have specific areas of focus that we have targeted our responses upon.

### **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 to the principles regarding the Code Manager being notified and parties responsibilities where breaches relate to REC services. We have further commented upon this in the attached sheet in respect of the Qualification and Maintenance Schedule.

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

We have assumed in the application of this to gas, that there is no impact to the data held by CDSP. Support in principle but would note that any proposed gas changes to data or accessed to CDSP would need assessment when known.

### **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?**

We are unable to respond to this question as not being party to the relevant codes, we have been unable to review any documentation but expect that a full review of this documentation will be required to ascertain whether any CDSP Services related to unregistered sites will be impacted.

### **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?**

We were supportive of the change that sought to introduce this Schedule 22 SPAA; and therefore we agree there is a strong case for reconciliation of data held by PPMIPs and CDSP data and that delivery the service through the CDSP would be the most efficient solution irrespective of which code is specified within. We expect that this will be a more robust process from a data privacy perspective.

### **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?**

We were supportive of this approach.