Consultation

Switching Programme Significant Code Review: Retail Energy Code v3.0			
Publication date:	31 March 2021	Contact:	Rachel Clark
		Team:	Switching Programme
Response deadline:	30 July 2021	Tel:	020 7901 3907
		Email:	Switching.Programme@ofgem.gov.uk

We are consulting on the schedules to the Retail Energy Code (REC) that enable Faster, More Reliable Switching. This involves inserting a number of new schedules into the REC at v3.0, and updating a small number of schedules which will have been part of REC v2.0. Some of the changes we are proposing would require changes to other codes, which will be consulted on in the coming weeks.

We would like views from parties to the affected codes, as well as people with an interest in the Switching Programme. We also welcome responses from consumer groups. While we would further welcome responses from other stakeholders and the public, large portions of this consultation are highly technical in their nature and will require some prior understanding of the technical detail and the context of retail energy codes and the future switching arrangements.

This document outlines the scope, purpose and questions of the consultation and how you can get involved. Once the consultation is closed, we will consider all responses. We want to be transparent in our consultations. We will publish the non-confidential responses we receive alongside a decision on next steps on our website at **Ofgem.gov.uk/consultations**. If you want your response – in whole or in part –

to be considered confidential, please tell us in your response and explain why. Please clearly mark the parts of your response that you consider to be confidential, and if possible, put the confidential material in separate appendices to your response.

Contents

1. Introduction

What are we consulting on?

1.1.   The Retail Energy Code (REC) is developing over a number of versions:

- REC v1.0 was designated on 1 February 2019 in order to facilitate delivery of the Faster, More Reliable Switching Programme.

- REC v1.1 covered a number of governance and change control related schedules, as well as those relating to certain theft schemes and came into force in January 2021.

- REC v2.0 will achieve retail code consolidation and is planned to come into force in September 2021.

- REC v3.0 is the subject of this consultation. It will contain the provisions underpinning faster, more reliable switching. This version will come into force at the same time as the new switching systems and processes, expected to be summer 2022.

1.2.   The current version of the REC can be seen on the REC website: www.retailenergycode.co.uk/the-rec.

Chapter 2: Governance and operational schedules

1.3.   The majority of the changes required to support the new switching arrangements are contained in new operational schedules to the REC that will be added at REC v3.0. In some cases, schedules that enter the REC at v2.0 will be updated at REC v3.0 rather than replaced.

1.4.   All REC v3.0 drafting reflects the End-to-End Business Process Design of the Switching Programme[1]. The intention of this consultation is to allow parties to review and comment on whether the drafting adequately reflects the design. Where policy decisions have been made in converting the design into regulatory requirements, we

---

[1] The Design Artefacts are available on the Switching Programme Portal (Salesforce). Users can search the Knowledge Base under the Design Category, which then filters out into, ABACUS, Technical Documents, Supporting Documents, Service Management, Misc.

have aimed to draw attention to those policy decisions in this document and, where appropriate, have asked specific questions on the proposed approach.

1.5.   There are a small number of open Change Requests (CRs) or design elaborations under the design and regulatory workstreams at the time of publishing this consultation. In general we have sought to reflect open CRs in the drafting, as if they were approved. **Inclusion of REC drafting to reflect open CRs in this consultation should not be interpreted as a decision on the CRs themselves. We have published the most up-to-date drafting possible to help programme participants to understand what obligations may be placed on them and where those obligations will sit in the regulatory framework. The CR process in those cases is ongoing and decisions will be made in due course in accordance with the Switching Programme governance. As such, that drafting is subject to change**.

1.6.   Where drafting is subject to an open CR, or further design work is ongoing, this is highlighted in this document and the relevant schedule(s)/service definition(s). Please see section 6 of this consultation document for further information on open CRs. **If respondents would like to submit comments on the content or intent of a particular CR or design elaboration this should be done via the Switching Programme Change Process, rather than in response to this consultation.**

Chapter 3: Data Specification

1.7.   The Data Specification contains the metadata that describes the Data Items and Market Messages that are used by industry parties to send and receive information. The scope of the Data Specification includes the information needed to support the requirements of multiple energy codes.

1.8.   The REC v3.0 Data Specification is an incremental update to the v2.0 REC Data Specification, which has previously been consulted on in December 2020. The incremental changes are related to new capabilities which will be established within v3.0 of the REC such as the new switching arrangements, Gas Enquiry Service arrangements and consequential changes to existing data.

Chapter 4: Service Definitions

1.9.   In November 2019[2] we published drafts of the Service Definitions for the following services:

- Electricity Enquiry Service

- Gas Enquiry Service

- Electricity Retail Data Agent

- Gas Retail Data Agent

- Switching Operator

- Central Switching Service (CSS)

1.10.   These Service Definitions have been updated following careful consideration of the response to that consultation, and to reflect changes and elaborations to the End-to-End Design since November 2019. The CSS Certificate Authority Service Definition is also published here for consultation, and has not been previously consulted on.

Chapter 5: Next steps

1.11.   The changes discussed in this document are the subject of the Switching Programme Significant Code Review (SCR). As noted above, there are also a number of outstanding design CRs which will impact on the regulatory drafting. In the final chapter of this document we set out the next steps for developing and implementing REC v3.0.

---

[2] https://www.ofgem.gov.uk/publications-and-updates/rec-technical-specification-approach-consultation

Context and related publications

1.12. We are consulting on the schedules for REC v3.0, which contain the provisions to make faster, more reliable switching happen

1.13. The introduction of faster, more reliable switching will require consequential changes to a number of other energy codes. The consequential change legal drafting will be published as a package for consultation around 4-6 weeks after the publication of this consultation.

1.14. Information about faster, more reliable switching and Ofgem's Switching Programme is available on the Ofgem website[3]. The following publications in particular explain the origins, strategic context, policy rationale and technical considerations for the delivery of faster, more reliable switching:

- November 2015: Switching Significant Code Review Launch Statement and Request for Expressions of Interest to Participate in Programme Workgroups[4]

- February 2018: Switching Programme Outline Business Case and Blueprint Decision[5]

- May 2019: Switching Programme Full Business Case[6]

1.15. The following publications provide context for the development of the REC:

- June 2019: Switching Programme and Retail Code Consolidation: Proposed changes to licences and industry codes.[7] With this consultation we published a number of REC schedules and consulted on them.

---

[3] https://www.ofgem.gov.uk/gas/retail-market/market-review-and-reform/smarter-markets-programme/switching-programme
[4] https://www.ofgem.gov.uk/publications-and-updates/switching-significant-code-review-launch-statement-and-request-expressions-interest-participate-programme-workgroups
[5] https://www.ofgem.gov.uk/publications-and-updates/switching-programme-outline-business-case-and-blueprint-phase-decision
[6] https://www.ofgem.gov.uk/publications-and-updates/switching-programme-full-business-case
[7] https://www.ofgem.gov.uk/system/files/docs/2019/06/june19_switching_programme_and_retail_code_consolidation_consultation_final2.pdf

- November 2019: REC Technical Specification Approach Consultation[8]

- July 2020: Having paused stakeholder engagement and consultations on the REC in order to allow stakeholders to prioritise the response to the COVID-19 pandemic, we published working drafts of the REC schedules[9] for transparency.

- October 2020: Ofgem consultation on proposals for REC v1.1[10]

- November 2020: Switching Programme and Retail Code Consolidation: Proposed Licence Modifications[11]

- December 2020: REC v2.0 and Retail Code Consolidation[12]

Consultation stages

1.16. We are publishing these schedules for REC v3.0 now in order to provide early regulatory clarity. As there are a large number of industry consultations taking place over the coming months, we are providing an extended consultation period until 30 July 2021.

1.17. Following closure of the consultation, we will carefully analyse the responses. Where the consultation response suggests that changes to the REC schedules are needed, we will make those in discussion with the Regulatory Design User Group (RDUG) over autumn 2021.

1.18. We will publish the consequential changes to other codes for consultation 4-6 weeks following the publication of this document. The consequential changes consultation will close on the same date as this consultation, 30 July 2021.

---

[8] https://www.ofgem.gov.uk/publications-and-updates/rec-technical-specification-approach-consultation
[9] https://www.ofgem.gov.uk/publications-and-updates/retail-energy-code-schedules-and-proposed-changes-licences-working-drafts-july-2020
[10] https://www.ofgem.gov.uk/publications-and-updates/retail-energy-code-proposals-version-11
[11] https://www.ofgem.gov.uk/publications-and-updates/switching-programme-and-retail-code-consolidation-proposed-licence-modifications
[12] https://www.ofgem.gov.uk/publications-and-updates/retail-energy-code-v20-and-retail-code-consolidation

How to respond

1.19. We want to hear from anyone interested in this consultation. Please send your response to the person or team named on this document's front page.

1.20. The overarching purpose of this consultation is to seek views on whether the regulatory drafting accurately and clearly reflects the End-to-End Design of the new switching arrangements. Where appropriate, we've asked for your feedback on specific provisions in questions throughout. Please respond to each one as fully as you can. We have also provided a template spreadsheet to provide comments on the drafting in the documents published alongside this consultation document. Where possible we ask that respondents use this template to provide comments.

1.21. We will publish non-confidential responses on our website at www.ofgem.gov.uk/consultations.

Your response, data and confidentiality

1.22. You can ask us to keep your response, or parts of your response, confidential. We'll respect this, subject to obligations to disclose information, for example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

1.23. If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you *do* wish to be kept confidential and those that you *do not* wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we'll get in touch with you to discuss which parts of the information in your response should be kept confidential, and which can be published. We might ask for reasons why.

1.24. If the information you give in your response contains personal data under the UK General Data Protection Regulation (UK GDPR)[13] and domestic legislation on data

---

[13] The General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the UK's withdrawal from the European Union (**UK GDPR**)

protection, the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.

1.25. We are working with the Retail Energy Code Company (RECCo) to develop the REC schedules under consultation here, and may require to share non-confidential responses with RECCo and the REC Code Manager to enable us to develop the REC schedules further in response to consultation responses. Similarly, the consequential changes to codes are being developed by the respective code bodies, so where a comment on the REC drafting might also impact the consequential change drafting, we may share non-confidential responses with the relevant code administrators.

1.26. If you wish to respond confidentially, we'll keep your response itself confidential, but we will publish the number (but not the names) of confidential responses we receive. We won't link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

General feedback

1.27. We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to these questions:

1. Do you have any comments about the overall process of this consultation?
2. Do you have any comments about its tone and content?
3. Was it easy to read and understand? Or could it have been better written?
4. Were its conclusions balanced?
5. Did it make reasoned recommendations for improvement?
6. Any further comments?

Please send any general feedback comments to stakeholders@ofgem.gov.uk

How to track the progress of the consultation

You can track the progress of a consultation from upcoming to decision status using the 'notify me' function on a consultation page when published on our website. Ofgem.gov.uk/consultations.

Once subscribed to the notifications for a particular consultation, you will receive an email to notify you when it has changed status. Our consultation stages are:
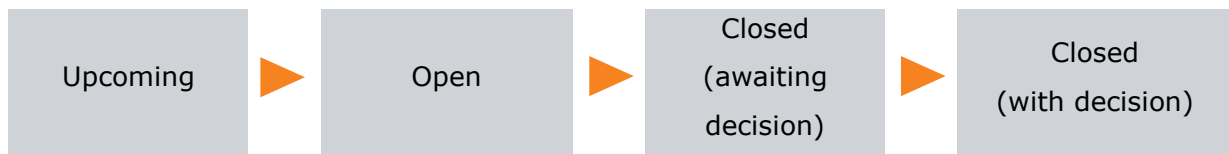
2. Governance and operational schedules

Section summary

The processes and obligations on parties operating in the new switching arrangements will be set out in a range of governance and operational schedules to the Retail Energy Code (REC). These schedules have been drafted in consultation with industry and the service providers in the new landscape, and this chapter summarises the content and key developments in each schedule. The proposed drafting to support the new arrangements is published for review alongside this consultation.

Questions

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

Question 2.2: Do you agree that suppliers should be required to de-activate a registration following termination of an RMP within 10 working days? If not, what would be an appropriate timeline?

We have provided a template spreadsheet to provide detailed comments on the schedules, and where possible we ask that respondents use this template in their response.

Introduction

2.1.   When the Central Switching Service (CSS) goes live in Summer 2022[14] the operational processes and obligations on industry to deliver faster and more reliable switching will be added to REC v2.0 to form REC v3.0. The majority of the changes required to support the new switching arrangements will be contained in new operational

---

[14] The latest programme milestone log is available on the Switching Programme Portal: https://switchingprogrammeportal.my.salesforce.com/sfc/p/#4J000000Fmw9/a/4J000000MjZw/dC.JDWyh5GT357iRuLr6IKTCUADbS6JLhr1uz6uv0zs

schedules to the REC that will be incorporated into REC v3.0. In some cases, schedules that enter the REC at v2.0 will be updated to include obligations relating to CSS, for example the processes set out in the Metering Operations Schedule will be updated to reflect the new switching arrangements. Additionally, some REC v2.0 schedules will be removed at v3.0: The MRA[15] Transition Schedule and SPAA[16] Transition Schedule will no longer be relevant post-CSS go-live.

2.2.   We recently consulted on REC v2.0[17], and are carefully considering the responses to that consultation. Where schedules are being updated at v3.0 rather than inserted as new schedules (ie the Data Access Schedule and EES[18] Service Definition), the drafting published alongside this consultation does not reflect our decisions on the REC v2.0 consultation. When reviewing these documents, respondents should focus on the tracked changes that show our suggested amendments for REC v3.0. There is no need to resubmit comments on the base v2.0 drafting.

2.3.   For the schedules that will enter REC at v3.0, tracked changes show where amendments have been made since the schedules were last baselined in November 2020.[19]

2.4.   All REC v3.0 drafting reflects the End-to-End Business Process Design of the Switching Programme. The intention of this consultation is to allow parties to review and comment on whether the drafting adequately reflects the design. Where policy decisions have been made in converting the design into regulatory requirements, we have aimed to draw attention to those policy decisions here and where appropriate have asked specific questions on the proposed approach. However, respondents should note that the overall business process design for the new switching arrangements is not the subject of this consultation. Where respondents feel the switching design should be changed, this should be raised via the Switching Programme Change Process[20] as a change to the design.

---

[15] Master Registration Agreement
[16] Supply Point Administration Agreement
[17] https://www.ofgem.gov.uk/publications-and-updates/retail-energy-code-v20-and-retail-code-consolidation
[18] Electricity Enquiry Service
[19] The November 2020 baselined documents are available to programme participants on the Switching Programme Portal (Salesforce)
[20]

2.5.　　There are a small number of open Change Requests (CRs) or design elaborations under the design and regulatory workstreams at the time of publishing this consultation. Where drafting is subject to an open CR, or further design work is ongoing, this is highlighted in this document and the relevant schedule(s). If respondents would like to submit comments on the content or intent of the CR or design elaboration this should be done via the Switching Programme Change Process, rather than in responses to this consultation.

2.6.　　**We are consulting on whether the schedules published here are accurate and clear reflections of the switching design. We have provided a template spreadsheet to provide detailed comments on the schedules, and where possible we ask that respondents use this template in their response.**

REC Main Body

2.7.　　There are no significant updates to the Main Body planned for REC v3.0. Some minor changes will be required to update references to MPAS[21] to instead refer to CSS, for example where reference is made to the ability to suspend registration services in events of default.

2.8.　　We have not published a change marked version of the Main Body as part of this consultation. If the need for further substantive updates is identified we will consult on these at the RDUG.

Interpretations

2.9.　　An updated Interpretations schedule is published alongside this consultation, to support reviews of the other schedules. Tracked changes show definitions that will be added or amended at REC v3.0. This is based on the version published in the December 2020 REC v2.0 consultation. Comments on REC v2.0 definitions that are not changing at REC v3.0 should not be resubmitted in response to this consultation.

---

https://switchingprogrammeportal.my.salesforce.com/sfc/p/#4J000000Fmw9/a/4J000000LZN0/GiUZehs2vX68RmMH29sPXrhIGxCc27gfYjcXw6U3wuw
[21] Meter Point Administration Service

Transition

2.10. The Transition schedule sets out the requirements on parties with regard to delivery of the Switching Programme. This schedule will not be amended as part of REC v3.0. Parties should note that the Transition schedule will continue beyond CSS go-live and into the post-implementation period. The Post-Implementation Working Group, which is due to be established in spring 2021, will consider the appropriate timing and mechanism for the removal of this schedule.

Qualification and Maintenance

2.11. The Qualification and Maintenance schedule is part of REC v2.0 and REC v3.0, and as such was consulted on in December 2020. The v2.0 schedule already covers the expected processes to qualify for CSS, and this drafting was included in the December 2020 consultation. If any changes to the Qualification process for CSS Users are required, for example as a result of a design change, we will consult on any drafting changes via RDUG. As no material changes are currently expected, we have not published a version of this schedule alongside this consultation.

Market Exit

2.12. The Market Exit schedule is part of REC v2.0 and REC v3.0, and as such was consulted on in December 2020. The schedule covers voluntary exit and expulsion from the code, and non-parties ceasing to be REC Service Users.

2.13. We do not expect to make any changes for REC v3.0. Programme stakeholders may note that CR-D025 was raised to propose changes to the Supplier of Last Resort (SoLR) process, which would require updates to the REC schedule. This CR was withdrawn in February 2021, and we consider that the prevailing approach to SoLR under the End-to-End Design does not require specific provisions within the REC. This is because the management of MPIDs and their relationship to Organisational entity is covered by processes in the UNC and BSC, as those codes master the relationship between MPIDs[22] and suppliers.

---

[22] Market Participant ID

Charging Methodology

2.14. Our expectation is that charges relating to the CSS will be recovered on the same basis as RECCo's broader funding model, which is charging suppliers on a market share basis.

2.15. Considerations are ongoing regarding the potential need for credit cover. Like the SPAA and MRA before it, the REC does not currently contain any credit cover requirements. The REC levies charges in advance and on a market share basis, which allows cost allocation to adjust for any changes to a single party's portfolio (whether that be through acquisition or a Supply of Last Resort appointment). However, exposure to bad debt from a supplier insolvency could have short term cashflow impacts. We are keen to ensure that RECCo is at all times able to pay its service providers, including the DCC in its role as CSS provider, in a timely fashion.

2.16. Several industry codes place credit requirements upon parties, protecting the network and/or service provider and wider market from the consequences of payment default or supplier failure.

2.17. The risk of payment default is not specific to one service provider or the switching arrangements more generally. We have therefore asked RECCo to consider this matter further in the coming months, and to share its conclusions no later than autumn 2020, if appropriate in the form of a REC Change Proposal. We consider that this will allow the issue to be addressed in a timely manner outside of the SCR process, whilst ensuring that the RECCo Board remains best placed to manage its own risks and cash flow in the interests of all stakeholders.

Data Access

2.18. The Data Access schedule will be part of REC v2.0 and REC v3.0. In REC v2.0 the Data Access schedule covers only access to the Electricity Enquiry Service (EES). At REC v3.0 the Data Access schedule will be extended to cover the Gas Enquiry Service (GES). The drafting published alongside this consultation shows tracked changes against the electricity-only schedule consulted on in December 2020. For the avoidance of doubt, the base drafting published here has not been updated following the December 2020 consultation (aside from where it reflects the extension to gas) and there is no need to resubmit comments on the v2.0 drafting.

2.19. We have considered with RDUG and UNC Parties the mechanism for governing access to gas data. Access to data within the EES is governed completely within the REC, and all 'owners' of data within the EES are parties to the REC, so are fully engaged in the REC change process if, for example, there was a proposal to create a new category of enquiry service user. For the GES, some data is 'owned' by shippers, who will not be party to the REC. We have therefore considered whether alternative or additional governance under a code that shippers are party to (ie UNC) would be appropriate.

2.20. Following discussion at RDUG, and engagement with Gas Transporters, Shippers and Xoserve, we have concluded that access to data within the GES can be solely a matter for the REC. We consider that the GES is a REC service, and as such it is appropriate for the service to be governed by the REC. The REC drafting provides for interested parties to be consulted on a proposed change to a REC service, so there is a route for Shippers and the Data Services Contract (DSC) Contract Management Committee[23] to input to any proposal to extend or amend data access rights.

2.21. Some parties had proposed that data 'owners', or the Contract Management Committee, should be able to veto changes to data access rights within the REC. We have considered this proposal. We do not consider this to be proportionate, as the REC has provisions relating to use of commercial data (REC Clause 18) and the provisions of the UK GDPR, as well as REC Clauses 19 and 20 on data controller and data processor obligations, apply in relation to processing of personal data.

2.22. For the avoidance of doubt, governing access to data under the REC does not mean that the metadata relating to the data items will be governed under the REC. Governance of metadata (for example the structure of an MPRN) will be set out in the Data Specification and subject to the change process within the code managed by the metadata owner. We expect that some of the metadata relating to the GES will be governed under the UNC.

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

---

[23] This is the committee formed under the UNC to represent Customers in the management of the DSC contract, which is currently responsible for gas data access.

Metering Operations

2.23. The Metering Operations schedule details a number of end to end processes carried out by Metering Equipment Managers (MEMs). This includes processes covering a change of supplier, with or without an associated change of MEM. Changes to the Metering Operations schedule are therefore expected to reflect the new switching arrangements.

2.24. Given that the v2.0 Metering Operations schedule was recently consulted on via the December 2020 consultation, and updates as a result of this consultation are still being considered; we have not included an updated v3.0 schedule at this time. Updated drafting will be provided for both v2.0 and v3.0 at a later date via RDUG.

CSS Onboarding

2.25. The initial draft of this schedule was baselined in November 2020. The schedule covers the process for becoming a CSS User, including:

- Process for establishing public and private keys.

- Process for establishing webhooks.

- Process for CSS testing.

- CSS User undertakings.

2.26. This schedule should be read in conjunction with the Qualification and Maintenance schedule.

2.27. The schedule has been updated since November 2020, shown in tracked changes, to reflect the following design and regulatory developments:

- Inclusion of the ECoS[24] provider due to be introduced in the SEC, to be treated the same as the Smart Metering DSP[25].

---

[24] Enduring Change of Supplier arrangements for smart meters
[25] Data Service Provider

- Proposed regulatory approach to adaptor services in the REC, as set out in CR-D075. This CR proposes that adaptor services should qualify under the REC as CSS Interface Providers, and therefore be subject to direct assurance of their security arrangements rather than multiple parties needing to manage this contractually. Each adaptor service provider would only need to qualify once, regardless of how many parties they provided services to. Comments on this proposal should be submitted via the Change Process, rather than in response to this consultation. This will enable an earlier decision on the proposal and provide certainty to adaptor service providers and their users. Should the CR be rejected or amended, the drafting in this schedule would be updated to reflect this and/or any alternative proposal that is approved via the Change Process.

- Enduring CSS testing arrangements extended to cover all CSS Users, rather than only suppliers and DNOs.

- Changes to the CSS Code of Connection (CoCo) impacting the process for requesting security certificates (as set out in CR-D065, which at the time of publishing has not yet been decided; the proposed drafting included is therefore subject to change. Please see paragraphs 1.5 and 1.6 above, and chapter 5 below, for further information on open CRs).

Registration Services, Address Management, Switching Data Management, RMP[26] Lifecycle, Switching Service Management, Related Metering Points and Resolution of Consumer-Facing Switching and Billing Problems (CFSB)

2.28. The Registration Services, Address Management, Switching Data Management, Switching Service Management, Related Metering Points and CFSB schedules were first published in June 2019, with updates in July 2020 and rebaselined versions published in November 2020. The RMP Lifecycle schedule was first published in July 2020 and baselined in November 2020. The versions published alongside this consultation show tracked changes against the November 2020 versions.

---

[26] Registrable Metering Point

2.29. Since November 2020, the following updates have been made:

- Removal of the interface table rows relating to synchronous validation; clarification in the Switching Data Management schedule that a synchronous response is provided for all messages to and from CSS.

- Inclusion of reference to Switching Data Service Providers carrying out asynchronous validation, noting that the approach to managing errors is still to be defined. (See CRs D060 and D061 which are planned to be assessed before CSS go-live, but implemented after.)

- Update to Market Message names to reflect changes to CSS Interface Definition Specification and the references within the Data Specification.

- Tweaks to the definition of Related Metering Point based on comments received via RDUG.

- Addition of Switching Portal User undertakings section in the Switching Service Management schedule and details taken from the Service Management CoCo, subject to approval of CR-D063, which at the time of publishing has not yet been decided; should the CR be rejected or amended, this drafting would change to reflect the design.

- Changes to the Switching Data Management schedule to remove CSS APIs[27] for communicating Market Participant Data between CSS, Elexon, Xoserve and the Code Manager (note: this reflects CR-D059 which at the time of publishing has not yet been decided; should the CR be rejected or amended, this drafting would change to reflect the design).

- The Registration schedule includes new provisions requiring suppliers to consult the Retail Energy Location Address before submitting a switch request. This regulatory change is being progressed via CR-D073, and as such we ask that comments on this are submitted through the Switching Programme Change Process rather than in response to this consultation. This will enable an earlier

---

[27] Application Programming Interface

decision on the proposal and therefore earlier clarity for suppliers on what their obligations will be in the new arrangements. Inclusion of the drafting in this consultation should not be interpreted as a decision on the CR (please see paragraphs 1.5 and 1.6 above and chapter 5 below for further information on open CRs).

- The RMP Lifecycle schedule has been amended to clarify that a small number of gas sites are not recorded in CSS.[28] In addition, the schedule requires a supplier to de-activate its registration following termination of an RMP within 10 Working Days, where previously there was no timescale associated with this requirement.

2.30. Through consultation with RDUG, we note that the Switching Service Management schedule does not contain the detailed requirements that parties may expect to see to enable them to design their systems and business processes, for example information about the content of regular reporting. This detail will not be contained within the schedule, and will instead be part of a set of 'Category 3' REC operational documents, to be developed over the coming months.

Question 2.2: Do you agree that suppliers should be required to de-activate a registration following termination of an RMP within 10 working days? If not, what would be an appropriate timeline?

---

[28] NTS Supply Meter Points, Shared Supply Meter Points and Supplier Exempt Meter Points will be switched in UK Link, as per the DB4 design.

3. Data Specification

Section summary

We are consulting on v3.0 of the Data Specification, which is an incremental update to v2.0, which was consulted on in December 2020. The incremental changes are related to new capabilities which will be established within REC v3.0 such as the new switching arrangements, Gas Enquiry Service arrangements and consequential changes to existing data.

Questions

We have provided a template spreadsheet to provide detailed comments on the accuracy of the data specification, and where possible we ask that respondents use this template in their response.

Introduction

3.1. The Data Specification contains the metadata that describes the Data Items and Market Messages that are used by industry parties to send and receive information. The scope of the Data Specification includes the information needed to support the requirements of the REC, BSC, DCUSA, UNC, IGT UNC and parts of the SEC[29]. The Data Specification also contains a Data Access Matrix, describing who can access each data item and any conditions associated with this access, and End-to End Process Diagrams and Interaction Sequence Diagrams which provide visual representations of the processes managed under the REC.

3.2. The format of the Data Specification documentation published here does not reflect the final product, which will be the Energy Market Architecture Repository (EMAR),

---

[29] Retail Energy Code, Balancing and Settlement Code, Distribution Connection and Use of System Agreement, Uniform Network Code, Independent Gas Transporter Uniform Network Code, and Smart Energy Code respectively.

currently being developed by the Code Manager during mobilisation of the REC. These documents will provide the Code Manager with the information required to develop and populate the EMAR. Therefore, while we welcome comments on the content of the documents, we do not request comment on the usability of the current artefacts. RECCo is leading further engagement with stakeholders on the development of the EMAR in 2021.

Data Specification v3.0 updates

3.3.   The REC Data Specification will be accessible within the EMAR. v2.0 of the REC Data Specification primarily contains data previously represented within the Data Transfer Catalogue (DTC), the RGMA[30] Data Catalogue and the SPAA Data Catalogue; it will also contain data previously represented within the MRA or SPAA code documents and schedules or ancillary documents such as technical specifications, such as the Electricity Enquiry Service API specification.

3.4.   The REC v3.0 Data Specification is an incremental update to the REC v2.0 Data Specification, consisting of the following high-level changes:

- **Central Switching Service (CSS) Messages:** those messages sent to and from the CSS and referenced within the wider REC v3.0 schedules, such as the Registration Services schedule, the Address Management schedule and the RMP Lifecycle schedule.

- **Gas Enquiry Services (GES) API Messages**: those messages sent to and from GES to support enquiry requests from Shippers, Meter Asset Providers, Gas Suppliers and Third-Party Intermediaries.

- **GES Data Access Matrix:** a record of the data items which can be accessed via GES by certain Market Roles for data related to consumers within their own portfolios or not within their portfolios.

---

[30] Retail Gas Metering Arrangements

- **DTC Switching Consequential Change:** A record of data items or market messages which will be subject to change upon implementation of v3.0 of the REC.

DTC Switching Consequential Change

3.5. The data items and market messages currently represented within v2.0 of the Data Specification are recorded within the spreadsheet, "DTC Consequential Changes v1.0".

3.6. Changes are recorded in the following manner:

- Deleted: The data item or message will be removed from v3.0 of the Data Specification (the identifier of the entity to be deleted is recorded).

- Updated: The data item or message will be updated within v3.0 of the Data Specification (the specific change is recorded).

GES Data Access Matrix and GES API Messages

3.7. The GES data access matrix and the GES API messages are recorded within the Microsoft Access database "Annex E - REC v3.0 Data Specification Access Database2.1".

3.8. The matrix records the data items which can be accessed by each relevant Market Role and the conditions under which the data can be accessed:

- Portfolio: The data item can only be accessed for consumers within that organisation's portfolio.

- Community: The data item can be accessed for consumers outside of that organisations portfolio (under specific lawful conditions).

3.9. The data access matrix can be viewed in the spreadsheet "GES Data Access" using the pivot table functionality.

3.10. The associated API messages can be viewed within the spreadsheet "v3.0 Market Message Catalogue". The MessageScenarioVariantIdentifier (the id beginning in "SV") can be utilised to view the message structure and associated data items within the

Microsoft Access database "Annex E - REC v3.0 Data Specification Access Database2.1".

CSS Messages

3.11. CSS Messages and data items can be viewed within the spreadsheet "v3.0 Market Message Catalogue". The MessageScenarioVariantIdentifier (the id beginning in "SV") can be utilised to view the message structure and associated data items within the Microsoft Access database "Annex E - REC v3.0 Data Specification Access Database2.1".

3.12. The CSS messages are representative of version 8.5 of the Landmark CSS Interface Specification document ("the PhID"). These messages can be subject to change via change requests within the Switching Programme. The REC Code Manager will ensure that subsequent changes are reflected within the Data Specification.

4. Service Definitions

Section summary

Each service provided under the REC will be clearly described in a service definition, setting out what market participants should expect from a service and how they can interact with it. These service definitions have been drafted in consultation with industry and the service providers, and this chapter summarises the content and key developments in each service definition. The service definitions are published for review alongside this consultation.

Questions

We have provided a template spreadsheet to provide detailed comments on the service definitions, and where possible we ask that respondents use this template in their response.

Introduction

4.1. Each service provided under the REC will be clearly described in a service definition. The service definition will provide information to market participants on what they should expect from a service and how they can interact with it. It also sets out the standards that Performance Assurance Board (PAB) will use to hold it to account on performance. In November 2019 we published a number of draft switching Service Definitions alongside the Technical Specification Approach consultation:

- Electricity Enquiry Service

- Gas Enquiry Service

- Electricity Retail Data Agent

- Gas Retail Data Agent

- Switching Operator

- Central Switching Service (CSS)

4.2. These service definitions have been updated following careful consideration of the response to that consultation, and to reflect changes and elaborations to the End-to-End Design since November 2019. Given the level of structural change to the service definitions, we have published these as clean documents to support industry review.

4.3. We would highlight that the CSS Certificate Authority Service Definition has not previously been consulted on.

4.4. **We are consulting on whether the service definitions published here are accurate and clear reflections of the switching design. We have provided a template spreadsheet to provide detailed comments on the schedules, and where possible we ask that respondents use this template in their response.**

Electricity Enquiry Service (EES) Service Definition

4.5. This service definition covers access to the enquiry service via the online portal, access via APIs[31], and the functionality to support the operation of prepayment meters and accounts.

4.6. We consulted on a version of the EES service definition in December 2020, which will form part of the REC v2.0. The version published alongside this consultation shows tracked changes to reflect the amendments required at CSS go live, on top of the consulted-upon v2.0 iteration. We have not updated the v2.0 drafting here following the December 2020 consultation, and comments on the v2.0 drafting should not be re-submitted.

4.7. The tracked changes show updates to the drafting for REC v3.0 to:

- Reflect the interface with CSS and associated service levels.

---

[31] Application Programming Interfaces

- Reflect the switching service management requirements on the EES as a Switching Data Service Provider.

- Remove reference to the consolidated report.[32]

- Reflect the terminology applied to users of the service (Representative Persons) for consistency with the equiavalent gas document.

Gas Enquiry Service (GES) Service Definition

4.8. This service definition covers access to the enquiry service via the online portal and via the APIs. Unlike the EES, the GES will transfer to the REC at v3.0. No comments were received in the November 2019 consultation, but amendments have been made to reflect the latest design developments and updated policy position on data governance (see Chapter 2), and improve consistency with the EES Service Definition.

4.9. We note that there is ongoing consideration of the service levels associated with making data available via the GES. This is being considered under Design Issue DI-1568. If this Design Issue results in a CR, we will consult on any changes to the service definition through RDUG.

Electricity Retail Data Service (ERDS) Service Definition and Gas Retail Data Service (GRDS) Service Definition

4.10. The ERDS and GRDS service definitions cover the transfer of messages between CSS and other services and market participants. Updates have been made following careful consideration of the November 2019 consultation responses and to reflect the CSS service levels and design assumptions regarding batch processing.

32
https://www.ofgem.gov.uk/system/files/docs/2020/12/retail_code_consolidation_condoc_final_for_publication_15.12.2020_v1.1.pdf
(see paragraph 4.17.)

Central Switching Service (CSS) Service Definition

4.11.   The CSS service definition covers the Registration Service and the Address Management Service. Updates since November 2019 include:

- Addition of security requirements reflecting the CSS Code of Connection (CoCo); note this is currently subject to CR-D065, which at the time of publishing has not yet been approved; should the CR be rejected or amended, this drafting would change to reflect the design.

- Incorporation of information from the Address Management schedule and Non-Functional Requirements and removal of content already reflected in operational schedules.

- Changes to reporting requirements based on the agreed CSS design.

CSS Certificate Authority Service Definition

4.12.   The CSS Certificate Authority service definition is based on the PKI[33] Managed Service procured by DCC[34] to support the provision of security certificates and management of the Certificate Revocation List.

4.13.   This service definition should be read in conjunction with the CSS schedule, which sets out the process for obtaining security certificates.

4.14.   The approach to adaptor services (referred to as CSS Interface Providers in the REC) is the subject of CR-D075. Comments on the proposed approach to adaptor services should be submitted via the Switching Programme Change Process rather than this consultation. This will enable an earlier decision on the proposed approach and provide certainty for adaptor services and the parties that will use them.

---

[33] Public Key Infrastructure
[34] Data Communications Company

Switching Operator Service Definition

4.15. The Switching Operator service definition covers service management functionality and use of the service management system and switching portal. This service definition has been updated to include new details regarding the service management arrangements since November 2019.

4.16. The service definition has been drafted on the basis that CR-D063 is approved (please see paragraphs 1.5 and 1.6 above, and chapter 5 below, for further information on Open CRs). This covers the requirements placed on organisations connecting to the service management system. Should the CR be rejected or amended, the drafting would change to reflect the design.

4.17. The service definition also sets out the position on allocation of licences for organisations using the service management system (for the avoidance of doubt this only applies to Switching Data Service Providers as they are required to obtain a licence to meet their obligations to support the service management arrangements). This position is subject to approval of the proposal being developed by DCC regarding the allocation of licences and cost of additional licences, which is being progressed via the design workstream.

Future developments

4.18. Further developments are expected to the service definitions to reflect:

- Business continuity arrangements

- Reporting arrangements, specifically performance reporting required by the REC Performance Assurance Board

- Service management service levels, showing flow down service levels for the various switching data service providers.

- Service levels associated with the provision of gas data by the Gas Retail Data Agent (GRDA) to the CSS Provider, the timescales for the GES Provider to make data available to GES Users, the timescales for the provision of REL Address data where a new or updated MPL Address is provided and the timescales for making RMP updates available to the Smart Metering Data Service Provider.

4.19. These changes will be developed as further clarity becomes available in the design. Drafting will be discussed at RDUG and substantive changes will be subject to the CR process.

5. Next steps

Section summary

The changes discussed in this document are the subject of the Switching Programme Significant Code Review (SCR). This chapter explains the next steps for the SCR process and maintenance of the drafting which is the subject of this consultation.

Timeline for Next Steps

Open Change Requests (CRs)

5.1. There are a number of design CRs and in-progress elaborations which have bearings on the regulatory drafting. These CRs will progress on their own timelines outside of this consultation. If any CRs are rejected or change in such a way that the REC drafting also needs to change, we will not publish updated REC drafting for this consultation. However, any consequential changes to the REC drafting will be discussed with RDUG.[35]

5.2. There are two open regulatory CRs which are being progressed and determined outside of this consultation:

- CR-D073: Changes to the Registration Services Schedule of the REC v3.0 to require that the REL is consulted when initiating a switch

- CR-D075: Creation of the 'CSS Interface Providers' into the regulatory framework

5.3. These CRs will be discussed at RDUG in April 2021, and will be taken for decision at the Regulatory Group. We consider that progressing these policy decisions outside of this

---

[35] RDUG is an open group; programme parties interested in participating in these discussions on regulatory matters should contact Switching.Programme@ofgem.gov.uk

consultation will enable a quicker decision and earlier clarity for impacted parties, and ensure that all programme impacts are appropriately considered.

5.4.   As noted in chapter 1, inclusion of REC drafting to reflect open CRs in this consultation should not be interpreted as a decision on the CRs themselves. We have published the most up-to-date drafting possible to help programme participants to understand what obligations may be placed on them and where those obligations will sit in the regulatory framework.

Consultation on Switching SCR Consequential Changes to other codes

5.5.   We have taken the view that consultation on the 'consequential changes' relating to the Switching Programme SCR should be deferred for a few weeks. This is the package of changes to the BSC, UNC, IGT UNC, DCUSA and SEC[36], necessitated by the changes to industry processes to implement faster, more reliable switching.

5.6.   We would like to extend our thanks to all code bodies concerned for their efforts in preparing this drafting, and the majority of drafting has been completed. However, due to circumstances outside of the control of code bodies, including pending decisions on licence drafting and other change programmes, we have opted to allow additional time for development and review of consequential change drafting. While some codes are not impacted by these developments we consider that it is more helpful to publish these clearly as a complete set, rather than including some here and others separately.

5.7.   We will work closely with code bodies to complete this process and intend to publish this package 4-6 weeks following the publication of this consultation. Comments on the consequential changes will be requested by 30 July 2021, which is also the closing date for this consultation. This means that any parties who feel that they need to see the consequential change drafting in order to be able to properly respond to this consultation will be able to do so.

---

[36] Balancing and Settlement Code, Uniform Network Code, Independent Gas Transporter Uniform Network Code, Distribution Connection and Use of System Agreement, and Smart Energy Code, respectively.

REC v3.0: Faster More Reliable Switching

5.8.   Following the closure of this consultation on 30 July 2021 we will carefully consider all responses. We will publish any non-confidential responses (see chapter 1 above for further information on the publication of responses). We will then publish a decision document setting out the way forward where consultation responses require further changes to the code or consequential changes drafting set out here. We will make any changes in further consultation with RDUG over autumn 2021, and via the formal Switching Programme Change Process. This includes changes where the expectation of further development has been highlighted in this document.

5.9.   We intend to implement REC v3.0 and the consequential changes to other codes using the Switching Programme Significant Code Review (SCR). Under this process, we have planned to the following timeline:

Table 1: Switching Programme SCR timeline

Programme Milestone	Title	Date
RE400	Launch statutory consultation on switching licence changes	6 December 2021
RE420	Ofgem submits SCR modification proposals to relevant code panels	6 December 2021
RE410	Ofgem statutory consultation on licence changes closes	14 January 2022
RE430	Code panels submit SCR recommendations to Ofgem	4 February 2022

5.10.   We will bring REC v3.0 and the consequential changes to other codes into being through the Switching SCR, with the code requirements coming into force at the same time as CSS go live (currently planned for mid-2022).

Appendices

Index

Appendix	Name of appendix	Page no.
1	List of Subsidiary Documents	37
2	Privacy notice on consultations	38

Appendix 1 – REC v3.0 Documents

List of subsidiary documents
REC3 Interpretation Schedule
REC Schedule – Address Management
REC Schedule – CSS Schedule
REC Schedule – Data Access
REC Schedule – Registration Services
REC Schedule – Related Metering Points
REC Schedule – Resolution of CFSB Problems
REC Schedule – RMP Lifecycle
REC Schedule – Switching Data Management
REC Schedule – Switching Service Management
REC Service Definition – Central Switching Service
REC Service Definition – CSS Certificate Authority
REC Service Definition – EES CSS
REC Service Definition – ERDS
REC Service Definition – GES
REC Service Definition – GRDS
REC Service Definition – Switching Operator
Switching CAB Terms of Reference
REC v3.0 Data Specification

Appendix 2 – Privacy notice on consultations

Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, "Ofgem"). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

3. With whom we will be sharing your personal data

Unless you indicate otherwise, we will make your response, as provided, available online. We are working with RECCo to develop the REC Schedules under consultation here, and may require to share non-confidential responses with RECCo and the REC Code Manager to enable us to develop the REC Schedules further in response to consultation responses.

4. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for as long as an audit trail on decision-making relating to the questions discussed in this document should reasonably be available.

5. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at https://ico.org.uk/, or telephone 0303 123 1113.

6. Your personal data will not be sent overseas.

7. Your personal data will not be used for any automated decision making.

8. Your personal data will be stored in a secure government IT system.

9. More information For more information on how Ofgem processes your data, click on the link to our "Ofgem privacy promise".