

# Consultation

## Retail Energy Code: Technical Specification approach consultation

<b>Publication date:</b>	29 November 2019	<b>Contact:</b>	Rachel Clark, Programme Director
<b>Response deadline:</b>	24 January 2020	<b>Team:</b>	Switching Programme
		<b>Tel:</b>	020 2901 3901
		<b>Email:</b>	<a href="mailto:switchingprogramme@ofgem.gov.uk">switchingprogramme@ofgem.gov.uk</a>

We are developing a Retail Energy Code that governs the new, faster and more reliable switching arrangements as well as bringing together and updating the governance of existing gas and electricity retail arrangements. This document consults on a part of this new industry code known as the REC Technical Specification. The REC Technical Specification will incorporate:

- a data specification;
- security and data protection requirements;
- testing arrangements for market entrants and to support market innovation; and
- service definitions for each of the services specified by the REC.

We would like views from people with an interest in the REC, its delivery and operation. We particularly welcome responses from market participants, those representing consumers' interests and other stakeholders.

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](https://www.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.

© Crown copyright 2019

The text of this document may be reproduced (excluding logos) under and in accordance with the terms of the [Open Government Licence](#).

Without prejudice to the generality of the terms of the Open Government Licence the material that is reproduced must be acknowledged as Crown copyright and the document title of this document must be specified in that acknowledgement.

Any enquiries related to the text of this publication should be sent to Ofgem at:  
10 South Colonnade, Canary Wharf, London, E14 4PU. Alternatively, please call Ofgem on 0207 901 7000.

This publication is available at [www.ofgem.gov.uk](http://www.ofgem.gov.uk). Any enquiries regarding the use and re-use of this information resource should be sent to: [psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk)

## Contents

<b>Executive summary .....</b>	<b>4</b>
<b>1. REC Technical Specification .....</b>	<b>5</b>
<b>2. Next steps .....</b>	<b>9</b>
<b>Appendices.....</b>	<b>12</b>
<b>Appendix 5 – Summary of consultation questions.....</b>	<b>13</b>
<b>Appendix 6 – Privacy notice on consultations .....</b>	<b>15</b>

## Executive summary

We are introducing a new Retail Energy Code (REC) to bring together the code requirements relating to retail energy activities and to govern the operation of faster and more reliable arrangements for consumers to switch energy supplier.

We have launched a Switching Significant Code Review (SCR) to make the changes required to deliver the code governance requirements for the Switching Programme. We have today launched a Retail Code Consolidation (RCC) SCR which will rationalise retail energy codes by closing down the electricity Master Registration Agreement (MRA) and the gas Supply Point Administration Agreement (SPAA). Under the SCR we will move requirements that need to be retained into the REC or another industry code where this is more relevant.

This document consults on a section of the REC known as the Technical Specification. The scope of the Technical Specification covers the data, security, data protection, testing and service definition requirements under both the Switching SCR and the RCC SCR. The other parts of the REC will comprise of a Main Body – setting out the high level governance arrangements; Operational Schedules – which describe the obligations on parties in respect of processes such as switching and theft; Operational Documents – which set out the detail on terms of reference, forms, guidance and detailed processes, and Codes of Practice.

We expect the RCC SCR to be implemented on 1 April 2021. The Switching SCR will follow shortly after, in Summer 2021<sup>1</sup>. We have described the approach for the REC Technical Specification in this context. The transitional arrangements for code requirements will be set out in the RCC SCR launch statement.

Taking into account the views of respondents to this consultation, we will consult on the legal text of the REC Technical Specification in Spring 2020. This Spring 2020 consultation will also comprise, as much as is possible, the full content of the REC and the proposed consequential changes to other industry codes.

---

<sup>1</sup> The go-live date in the current plan is 1 July 2021. Decisions on go-live will be taken by the SRO advised by the Delivery Group, and will be based on operational and system readiness assessments.

## 1. REC Technical Specification

### Section summary

Through this consultation we are requesting views on the approach to developing the content of the REC Technical Specification. The scope of the REC Technical Specification covers data, security and data protection, testing and service definitions. This section provides a brief summary of each proposed part of the REC Technical Specification. The detailed approach for each part of the Technical Specification, together with the questions we have asked, is set out in Appendices 1 to 4 of this document.

### Technical Specification Scope

- 1.1. The REC Technical Specification provides the detailed technical information that supports the operational requirements set out in the REC. It comprises the following areas:
  - Data Specification
  - Service definitions
  - Testing arrangements
  - Security requirements Security and data protection requirements
- 1.2. Our approach to deliver each part of the REC Technical Specification is set out in Appendices 1 to 4. A summary is provided below:

### Data Specification Approach

- 1.3. The Data Specification will contain the metadata that describes the Data Items and Market Messages that are used by industry parties to send and receive information.
- 1.4. The scope of the Data Items and Market Messages is proposed to include the information needed to support the requirements of the REC, BSC, DCUSA, UNC, IGT UNC and parts of the SEC.<sup>2</sup> This is partly driven by our proposals under the RCC SCR

---

<sup>2</sup> Further information on the REC change management arrangements will be consulted upon shortly. This will explain how changes to Data Items and Market Messages, where another code is responsible, or has a significant interest, will be managed. This consultation will also set out our proposals for change management arrangements more broadly, including the progression of changes to the REC Technical Specification. Our aim is for the change management arrangements to vary and be proportionate for the specific part of the REC that they manage.

to close down the MRA and SPAA, which currently contains much of this data, but it also reflects our view that having a single digital platform that industry parties can use to access information will improve overall market efficiency and is in line with the Energy Data Task Force Recommendations. The REC Code Manager will be responsible for providing this platform.

- 1.5. As part of the overall REC Data Specification approach, described in Appendix 1, we are consulting on a metadata model that would be used to develop the Data Item Catalogue and the Market Message Catalogue.
- 1.6. The REC Data Specification will contain a Data Access Matrix describing who can access each data item and any conditions associated with this access. It will also contain End-to End Process Diagrams and Interaction Sequence Diagrams which will provide visual tools for the processes managed under the REC.
- 1.7. Taking into account consultation responses, we propose to complete the Data Item Catalogue and the Message Catalogue for consultation in Spring 2020. The remainder of the Data Specification will be developed by the REC Code Manager once appointed, with the aim of including this within the SCR submissions at the end of 2020, although any visualisation tools that do not place requirements on parties may be delivered later.
- 1.8. As noted above, the REC Code Manager will also be responsible for developing the arrangements for making this information (and other REC content) available to parties in a digitalised format.

### **Service Definition Approach**

- 1.9. Each service required under the REC will be clearly described in a service definition. This 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 PAB will use to hold it to account on performance.
- 1.10. To support the switching arrangements we have identified a need for service definitions covering the Switching Operator (SO), Central Switching Service (CSS), Gas Retail Data Service (GRDS), Electricity Retail Data Service (ERDS), Gas Enquiry Service (GES), Electricity Enquiry Service (EES), CSS Certificate Authority (CCA) and the REC Data Service (RDS). Of these, all other than the CCA and RDS have been included for consultation alongside the overall approach in Appendix 2.<sup>3</sup>
- 1.11. We have identified six further areas where non-switching service definitions are required. These are; theft related services, metering audit and adjudication services, gas CDSP third party services, electricity additional services Green Deal Central Charging Database services and data access audit services. Note that some of these areas may require more than one service definition.

---

<sup>3</sup> The CCA and RDS will be procured in parallel with this consultation, these service definitions are therefore not publicly available.

- 1.12. Taking into account responses to this document, we aim to consult on all of the switching and non-switching service definitions in Spring 2020. They will then be updated for submission as part of the SCR at the end of 2020.
- 1.13. In Appendix 2, we have taken the opportunity to consult on two policy questions in relation to enquiry services and whether particular functions of existing enquiry services should be retained under the REC. Specifically, the monthly/quarterly downloads from ECOES and DES respectively and the ability for electricity suppliers to set up reciprocal arrangements in relation to when other suppliers can access their portfolio data on ECOES.

### **Security and Data Protection Approach**

- 1.14. It is imperative that the REC has in place appropriate security and data protection requirements across all of the areas it governs.
- 1.15. The Switching Programme has agreed arrangements for how parties will securely send and receive messages from the CSS. For the CSS requirements, our proposed approach is to set these out in the service definition. Other market participants that interact with the CSS will be required to meet requirements set out in a new REC Onboarding and Maintenance Schedule.
- 1.16. We propose that new market participants will need to provide evidence of their compliance with the REC security and data protection requirements. We think that it would be efficient for the Code Manager to undertake this role, including any required audits.
- 1.17. Market participants will need to demonstrate ongoing compliance with security and data protection requirements. The enduring provisions are currently being developed for the CSS and will be provided at a later date. For the EES and GES we are proposing an annual audit consisting of an internal assessment with director level self-certification of compliance each year, with an external audit every three years. To assist market efficiency, we propose that the REC Code Manager is responsible for managing this ongoing assessment.
- 1.18. We are also proposing that the Code Manager is responsible for the ongoing maintenance of the Data Protection Impact Assessment and the Information Risk Assessment.
- 1.19. Taking into account responses to this consultation we aim to develop and consult on the required REC drafting (including the proposed REC Onboarding and Maintenance Schedule and the Security and Data Protection Assurance Schedule) in the Spring 2020 consultation. Further detail on our proposed approach is set out in Appendix 3.

### **Testing Approach**

- 1.20. The REC will include entry assessment testing requirements for when new gas suppliers, electricity suppliers and electricity Distribution Network Operators enter the market. The REC will also include requirements for these parties setting out how they
-

will demonstrate that they continue to meet the REC obligations when they make changes to their systems and processes.

- 1.21. The process for entry assessment will be specified within the Entry Assessment and Qualification Schedule. This was consulted upon in June 2019 and is in the process of being updated. This schedule also covers the ongoing requirements on parties when they make changes to their systems and processes. In the Testing Approach (see Appendix 4), we have provided information on our updated thinking. We propose to require suppliers and DNOs to make an annual declaration of expected changes and for the Code Manager to work with parties to agree any testing and monitoring that may be required.
- 1.22. To support the market entry arrangements, several documents will be included in the REC Technical Specification. These include the market entry self-assessment form and the test scripts for market scenario testing. These will be developed by the Code Manager once appointed.
- 1.23. The Testing Specification will also include details of the test environment(s) available for market participants and service providers to carry out testing on future system releases. Further information regarding enduring requirements for system release testing will be provided at a later date, once the DBT testing arrangements have been finalised.
- 1.24. The REC Code Manager will be responsible for delivery of non-CSS testing and DCC as Switching Operator will be responsible for CSS testing. The REC Code Manager will be responsible for managing the overall market entry testing arrangements, and will co-ordinate with other industry code bodies in doing so.



## 2. Next steps

### Section summary

This section sets out our plan for delivering the REC Technical Specification including how we will engage with stakeholders, overall timescales and how parties should respond to this consultation.

### Plan for delivery

- 2.1. The REC Technical Specification approach documents set out in Appendices 1 to 4 include individual plans for delivery. These plans describe the stages of delivery, who is responsible for each stage and the timescales. We have also included information on which stakeholder groups will be consulted and who will be responsible for approval.
- 2.2. The high-level timetable that we are following is to develop the REC drafting, taking into account responses to this document, for consultation in Spring 2020. We will update the REC drafting after the Spring 2020 consultation and baseline it through programme governance. The drafting will then enter a maintenance period where it can be updated through programme change control arrangements. We expect such changes to be made where errors are identified, or improvements can be made to the draft legal text. Changes may also be required to reflect agreed changes to the Switching Programme design or changes that are agreed to the existing market arrangements that are being brought into the REC through the RCC SCR. Where changes are raised during the maintenance period, we would expect to review these with stakeholders at the Regulatory Design User Group (RDUG) and for them to only be approved when they have been assessed positively against the defined criteria.
- 2.3. We recognise that not all of the relevant content will be ready for the Spring consultation, for example where it will be developed by the REC Code Manager (to be appointed in Q2 2020) or where it relies on further work during the Design, Build and Testing (DBT) Phase of the Switching Programme (for example the enduring CSS testing arrangements). We will test these proposals with stakeholders through RDUG, and potentially by publishing consultation documents before submitting them through programme governance.
- 2.4. Our aim is to have developed and baselined all of the required REC Technical Specification drafting, and consequential changes to other codes so that it can be included in the SCR submissions to the relevant code panels, and in relation to the REC changes, taken through programme governance, at the end of 2020.
- 2.5. Once agreed, the changes required for the RCC SCR will go live on 1 April 2021 and the Switching SCR changes will take effect in Summer 2021 at the point that the CSS goes live.

## How to respond to this consultation

- 2.6. We want to hear from anyone interested in this consultation. Please send your response to: [switchingprogramme@ofgem.gov.uk](mailto:switchingprogramme@ofgem.gov.uk)
- 2.7. We've asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.
- 2.8. We will publish non-confidential responses on our website at [www.ofgem.gov.uk/consultations](http://www.ofgem.gov.uk/consultations).

## Your response, data and confidentiality

- 2.9. 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.
- 2.10. 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.
- 2.11. If the information you give in your response contains personal data under the General Data Protection Regulation 2016/379 (GDPR) and domestic legislation on data 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 6.
- 2.12. 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

- 2.13. 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?

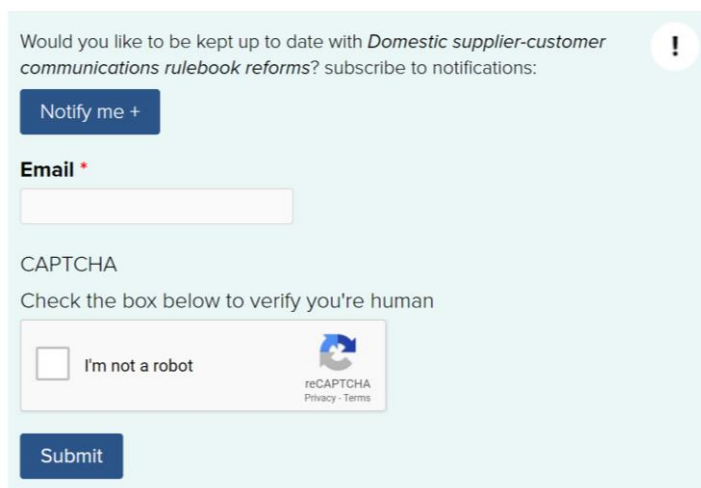
5. Did it make reasoned recommendations for improvement?
6. Any further comments?

2.14. Please send any general feedback comments to [stakeholders@ofgem.gov.uk](mailto:stakeholders@ofgem.gov.uk)

### How to track the progress of the consultation

2.15. 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](https://www.ofgem.gov.uk/consultations).

#### Notifications




Would you like to be kept up to date with *Domestic supplier-customer communications rulebook reforms*? subscribe to notifications: !

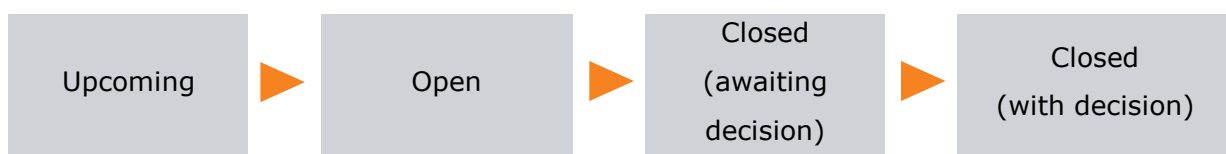
**Email \***

CAPTCHA

Check the box below to verify you're human

I'm not a robot  reCAPTCHA  
Privacy - Terms

2.16. 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:



## Appendices

### Index

Appendix	Name of appendix	Page no/Link
1	Data Specification Approach	<a href="https://www.ofgem.gov.uk/system/files/docs/2019/11/appendix_1_data_specification_approach_0.pdf">https://www.ofgem.gov.uk/system/files/docs/2019/11/appendix_1_data_specification_approach_0.pdf</a>
2	Service Definition Approach	<a href="https://www.ofgem.gov.uk/system/files/docs/2019/11/appendix_2_service_definition_approach_1.pdf">https://www.ofgem.gov.uk/system/files/docs/2019/11/appendix_2_service_definition_approach_1.pdf</a>
3	Security and Data Protection Approach	<a href="https://www.ofgem.gov.uk/system/files/docs/2019/11/appendix_3_security_and_data_protection_approach_1.pdf">https://www.ofgem.gov.uk/system/files/docs/2019/11/appendix_3_security_and_data_protection_approach_1.pdf</a>
4	Testing Specification Approach	<a href="https://www.ofgem.gov.uk/system/files/docs/2019/11/appendix_4_testing_approach_0.pdf">https://www.ofgem.gov.uk/system/files/docs/2019/11/appendix_4_testing_approach_0.pdf</a>
5	Summary of consultation questions	13
6	Privacy notice	15

## Appendix 5 – Summary of consultation questions

1.1. The questions asked in this consultation are set out in the appendices. For ease of reference they are collated below.

### Appendix 1 – Data Specification Approach

**Question 1:** Do you agree with the approach set out in this document for developing the REC Data Specification?

### Appendix 2 – Service Definition Approach

**Question 1:** Do you agree with the approach set out in this document for developing the REC switching and non-switching service definitions?

**Question 2:** Do you agree that the draft service definitions set out in Annex 1 to 6 meet the required standards set out in the Regulatory Design Criteria? If not, please describe how you think they should be improved?

**Question 3:** Do you support our proposal to remove the electricity provisions that allow a supplier to determine when specified data items can be shared with other suppliers?

**Question 4:** Do you support the removal of the monthly electricity and quarterly gas download of data from ECOES and DES respectively when these services move to the REC?

### Appendix 3 – Security and Data Protection Approach

**Question 1:** Do you agree with the approach set out in this document for developing the REC security and data protection arrangements?

**Question 2:** Do you agree with our approach to translating the CSS CoCo into the REC and, in particular, how we propose to establish obligations on both REC and non-REC parties?

**Question 3:** Do you agree that the requirements set out in paragraph 5.11 are set at the appropriate level and should be met by parties that want to access the REC enquiry services?

**Question 4:** Do you agree with our proposed approach to have a single assessment of a Market Participant's compliance with the information security and data protection requirements across all relevant REC services (prior to access being granted and on an ongoing basis)?

**Question 5:** Do you agree with our proposals to place requirements for maintenance of the DPIA and IRA, and implementation of the information security and data protection requirements and associated assurance, on the Code Manager?

### Appendix 4 – Testing Approach

**Question 1:** Do you agree with the approach set out in this document for developing the enduring REC testing requirements?

**Question 2:** Do you agree with the proposed approach to Qualification?

**Question 3:** Do you agree with the proposed approach to Maintenance of Qualification?

## Appendix 6 – 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](mailto: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.

#### **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 3<sup>rd</sup> 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](#)".