

Consultation

Retail Energy Code v2.0 and Retail Code Consolidation

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We are consulting on the schedules to the Retail Energy Code (REC) that enable retail code consolidation. This involves merging content from the Master Registration Agreement (MRA) and the Supply Point Administration Agreement (SPAA), and Balancing and Settlement Code (BSC) content regarding metering agents into the REC. In addition to that, we are consolidating a number of metering codes of practice in the REC and bringing the Green Deal provisions into the REC. Some of the changes we are making require changes to other codes, which we are also consulting on here.

We would like views from parties to the affected codes, codes of practice and agreements, as well as people with an interest in the specific codes or more broadly in code governance. We also welcome responses from consumer groups. While we would further welcome responses from other stakeholders and the public, large proportions 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.

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.

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1. Introduction

What are we consulting on?

1.1. The REC is developing over a number of versions:

- REC v1.0 was designated on 1 February 2019¹ in order to facilitate delivery of the Faster, More Reliable Switching Programme.
- REC v1.1 was subject to consultation from mid-October to mid-November 2020² and our decision is expected in December 2020.
- REC v2.0 will achieve retail code consolidation and is the subject of this consultation. Subject to consultation responses and consideration of other relevant factors, we³ expect to designate REC v2.0 in July 2021, so that the consolidated code will be governed under REC governance arrangements from 1 September 2021.
- REC v3.0 will contain the provisions underpinning faster, more reliable switching. This will come into force at the same time as the new switching systems and processes, expected to be summer 2022.

1.2. This consultation seeks views on REC v2.0 schedules and consequential changes to other codes, that will achieve retail code consolidation. This consists of three broad elements:

- Bringing retail code provisions for electricity (from the MRA⁴) and for gas (from the SPAA⁵) together in the REC,

¹ <https://www.ofgem.gov.uk/publications-and-updates/retail-energy-code-designation>

² <https://www.ofgem.gov.uk/publications-and-updates/retail-energy-code-proposals-version-11>

³ The terms “the Authority”, “Ofgem”, “we” and “us” are used interchangeably in this document.

⁴ Master Registration Agreement

⁵ Supply Point Registration Agreement

- Consolidating a number of other codes and codes of practice, such as the metering codes of practice and the Green Deal provisions, in the REC and bringing them under REC governance,
- A new technical specification for the code, including the Retail Market Data Specification which will be digitalised in the Energy Market Architecture Repository (EMAR) developed by the REC Code Manager.

Chapter 2: Retail Code Consolidation: REC v2.0 schedules

1.3. This section contains information on the REC schedules (the Schedules) that achieve retail code consolidation. We provide information on changes that have been made to earlier versions of these schedules, in particular to versions subject to an earlier consultation in June 2019, and a 'working draft' publication in July 2020⁶. We also highlight any decisions that have been made on the drafting following discussions with stakeholders.

1.4. The Schedules are at Appendix 1 of this consultation.

Chapter 3: Consequential Changes to Other Codes

1.5. The changes we are making in order to consolidate the MRA, SPAA and a number of smaller codes of practice in the REC require changes to other codes. Section 3 of this consultation document describes the changes to the following codes:

- MRA
- SPAA
- Smart Energy Code (SEC)
- Uniform Network Code (UNC) and Independent Gas Transporters (IGT) UNC
- Balancing and Settlement Code (BSC)⁷
- Distribution Connection and Use of System Agreement (DCUSA)

⁶ See the "Context and related publications" section below.

⁷ The BSC consequential changes published alongside this consultation do not reflect the proposals on consolidation of metering governance. Interested parties will be able to review and input to these changes via RDUG in 2021.

- 1.6. The drafting for these changes has been provided by the code bodies for the respective codes and is at Appendix 2 of this consultation.

Chapter 4: REC Technical Specification

- 1.7. The technical specification covers data, security and data protection, testing and service definitions.
- 1.8. We consulted on our proposed approach to developing the REC Technical Specification in November 2019.⁸ The documents that have been developed following the outcome of that consultation are published in Appendix 1.
- 1.9. For the avoidance of doubt, the material to be consulted upon here is not a representation of the final product that will be available in the REC. We are consulting on the data and information that will underpin the digitalised REC Technical Specification, developed by the REC Code Manager. The Retail Energy Code Company (RECCo) will provide more information about the user-friendly representation of the Technical Specification in early 2021.

Chapter 5: Next Steps and SCR Timelines

- 1.10. This section contains the next steps and timelines for further development and implementation of REC v2.0 and the consequential changes leading up to go-live of Retail Code Consolidation (RCC) on 1 September 2021.

Context and related publications

- 1.11. In June 2019 we consulted on a number of the REC v2.0 schedules, as well as drafting for the consequential changes to other codes.⁹ That consultation also contained our thinking on the Significant Code Review (SCR) for RCC.

⁸ See the “Context and related publications” section below.

⁹ <https://www.ofgem.gov.uk/publications-and-updates/switching-programme-and-retail-code-consolidation-proposed-changes-licences-and-industry-codes>

- 1.12. We launched the RCC SCR in November 2019.¹⁰ This set out our intention to consolidate the MRA and SPAA into the REC, to further consolidate a number of metering codes and the Green Deal Provisions in the REC and to make consequential changes to other codes.
- 1.13. In November 2019 we also consulted on the approach to the REC Technical Specification.¹¹
- 1.14. In July 2020, we published working drafts of REC schedules and draft licence condition changes. We made those drafts available for visibility, having delayed further formal consultation on all matters related to the Retail Energy Code in order to enable all stakeholders to deal with the immediate priorities and pressures of the Covid-19 pandemic.

Consultation stages

- 1.15. This consultation will close on 23 February 2021. We will then publish the responses that are not confidential. We will evaluate all responses and aim to complete any revisions to the REC v2.0 content before 30 April 2021. We anticipate that the REC v2.0 content will from that date onwards be considered stable until designation in July 2021.
- 1.16. Further detail on the next steps under the RCC SCR are in chapter 5 of this consultation document.

How to respond

- 1.17. 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.
- 1.18. We've asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can. We have provided a spreadsheet for comments on each

¹⁰ <https://www.ofgem.gov.uk/publications-and-updates/retail-code-consolidation-scr-launch-statement>

¹¹ <https://www.ofgem.gov.uk/publications-and-updates/rec-technical-specification-approach-consultation>

of the REC Schedules¹² we have published, which you may wish to use to record detailed comments on the drafting.

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

Your response, data and confidentiality

- 1.20. 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.
- 1.21. 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.
- 1.22. 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 4.
- 1.23. 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. Similarly, the consequential changes to codes are being developed by the

¹² https://www.ofgem.gov.uk/system/files/docs/2020/12/rec_v2_consultation_response_template.xlsx

respective code bodies, so we may share non-confidential responses relating to the consequential changes to other codes with the relevant code administrators.

- 1.24. 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

1.25. 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?


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

How to track the progress of the consultation

1.27. 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).


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1.28. 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. Retail Code Consolidation: REC v2.0 Schedules

Questions

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?

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

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

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?

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?

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?

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?

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?

Questions (continued)

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?

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?

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.

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.

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?

Introduction

- 2.1. This chapter covers the REC Schedules that we propose to designate as part of REC v2.0. There is a sub-section discussing each Schedule, and the Schedules themselves are published in Appendix 1.
- 2.2. Some of these Schedules have previously been consulted on in June 2019, and discussed at Regulatory Design User Group (RDUG) meetings in 2020. We published a further iteration of Schedules on the Ofgem website in July 2020 for transparency. Where we have published a previous iteration of a Schedule, the version in Appendix 1 has tracked changes against the last published version.
- 2.3. Where relevant, we have endeavoured to update the drafting to reflect code modifications in the existing codes that have been approved by Ofgem as of November

2020, with implementation dates up to September 2021. This exercise will be repeated and quality assured ahead of designation in July 2021.

- 2.4. We welcome comments on all of the Schedules published alongside this document, and have provided a spreadsheet pre-populated with a tab for each document and space to provide comment on specific provisions. In addition, we have asked specific questions on areas of our proposals in order to inform our decision on the way forward for these aspects of RCC.

Main Body, Accession Agreement and Interpretations Schedule

- 2.5. We do not propose any amendments to the REC Main Body as part of REC v2.0. We have recently consulted on REC v1.1, which included changes to the Main Body, and will shortly publish our decision on that consultation.
- 2.6. We have published an updated REC v2.0 Interpretations Schedule alongside this consultation. We welcome comments on the proposed definitions.
- 2.7. The REC Code Manager will develop an online Accession Agreement ahead of REC v2.0, and will assist any new parties to the code in completing the current paper based form.

Qualification and Maintenance

- 2.8. We consulted on a draft Entry Assessment and Qualification Schedule in June 2019. Seventeen respondents commented on our proposals for this schedule, mostly expressing high level support with a number of technical comments and suggestions. We have carefully considered these responses, and developed the schedule with input from stakeholders through RDUG. The November 2019 consultation on the REC Technical Specification also considered the overall REC testing approach, including entry assessment testing, which has now been reflected in this schedule. The following paragraphs highlight other key areas of change since June 2019.
- 2.9. We have renamed the “Entry Assessment and Qualification Schedule” the “Qualification and Maintenance Schedule”. We consider that this better reflects the fact that qualification is not a one-off event at market entry, but rather organisations must maintain their qualified status for the whole period that they are REC Service Users.
- 2.10. The previous version of this schedule applied to Energy Suppliers and Distribution Network Operators (DNOs) only. There was an expectation that a separate onboarding

and maintenance schedule would be developed to cover onboarding of REC Parties and non-REC Parties as REC Service Users. Due to the similarities between the processes for onboarding REC Services Users and the wider Entry Assessment provisions (which can be seen in Figure 1), we have consolidated these activities into a single schedule. As set out in the October 2020 REC v1.1 consultation, we are including Metering Equipment Managers (MEMs) as REC Parties, therefore their specific Qualification requirements are also captured in the Schedule.

2.11. The Qualification and Maintenance schedule in REC v2.0 will therefore be mandatory for suppliers¹³, DNOs, Gas Transporters (GTs), MEMs and REC Service Users. The schedule covers qualification for all REC Services, including for example the Energy Theft Tip Off Service (ETTOS).¹⁴ Applicants follow the processes in the schedule to become 'qualified' for their specific market role and as a user for each applicable REC Service. For the avoidance of doubt, existing energy market participants do not need to qualify ahead of RCC implementation. They will be "deemed qualified", in accordance with the schedule.

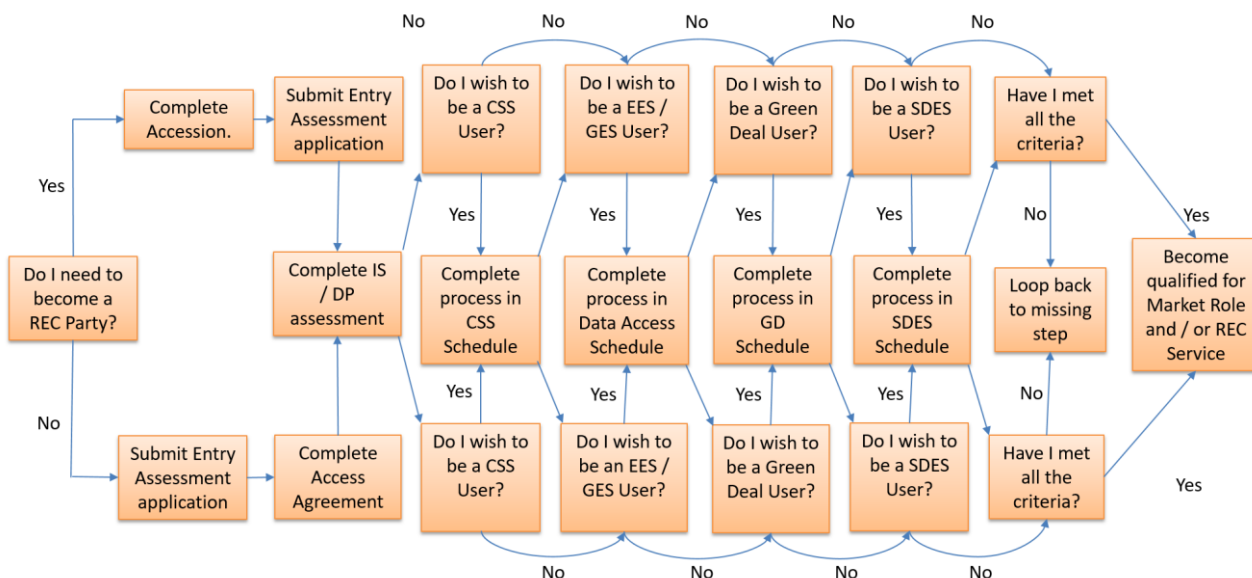
2.12. REC entry assessment remains a risk based process. In summary, the process covers:

- agreement of an entry assessment plan with the Code Manager,
- non REC Party to sign an access agreement for access to the Electricity Enquiry Service (EES), Gas Enquiry Service (GES), Central Switching Service (CSS) and/or Green Deal Service,
- business solution and internal testing assessment (Energy Suppliers and DNOs only),
- information security and data protection assessment (based on the REC Services the applicant is seeking to access and their market role),
- service specific requirements for the REC Services the applicant is seeking to access as set out in other relevant REC Schedules,
- external testing to cover key interfaces under the REC (Energy Suppliers and DNOs only).

¹³ Note that external testing requirements and explicit test scenarios for Gas Suppliers will apply from CSS go-live (ie REC v3)

¹⁴ We recently consulted on transferring ETTOS to the REC as part of v1.1, to come into force on 1 April 2021 (<https://www.ofgem.gov.uk/publications-and-updates/retail-energy-code-proposals-version-11>).

Figure 1: REC Service onboarding arrangements



2.13. Ongoing maintenance of qualification for all REC Parties and non-party Service Users will require submission of an annual statement of compliance. For Suppliers and DNOs, there is a further requirement to highlight changes to internal systems that impact interfaces with other market participants and service providers. We have considered the concerns raised by some stakeholders that disclosing information about internal systems may be particularly commercially sensitive. RECCo have advised that the contracts with the REC Code Managers include confidentiality requirements which cover this type of information.

Data protection and information security

2.14. We have given further thought to the data protection and information security requirements placed on Service Users, with input from the REC Code Manager. We propose that applicants are required to submit their organisation’s internal information security and data protection risk assessments, plus evidence that the organisation had completed the relevant up-to-date Information Commissioner’s Office (ICO) checklists, and evidence that they have the appropriate information security accreditation, reflective of the risks applicable to the specific organisation. The REC will not prescribe a specific accreditation or checklist. This non-prescriptive approach ensures that the framework is equally applicable to small and large companies, across the full range of REC Service Users. The onus will be on REC Service Users to identify the appropriate checklists and accreditation for their organisation, although the REC Code Manager will

develop a more detailed framework including guidance for users in this particular area as part of their mobilisation activities.

2.15. For maintenance of qualification, as part of the annual statement of compliance and/or External Assessment¹⁵, REC Service Users will certify or submit evidence (as appropriate) that:

- they have an up-to-date risk assessment covering information security and data protection risks associated with REC obligations,
- they have completed the relevant up-to-date ICO checklists,
- there have been no significant changes in their circumstances that would give rise to an increase in security or privacy risk, or where there has been a change, the appropriate mitigations have been put in place,
- they have appropriate information security accreditation, reflective of the risks applicable to their organisation (eg Cyber Essentials Plus Certification), and
- whether they have, or have not, been subject to any ICO reportable data incidents, and if so, the nature of such incidents.

2.16. The requirement to notify the Code Manager of a security breach is already included in some codes, for example those that underpin the Green Deal. We propose to extend this to all REC Service Users. We consider that this requirement is consistent with the desire to operate a risk based assurance framework, whilst protecting REC Services and other Market Participants from security issues.

2.17. We do not propose to require REC Service Users to demonstrate compliance with data protection legislation, nor do we propose that the Code Manager will assess compliance with legislation. The intent is for the Code Manager to determine whether a REC Service User has processes and policies in place to support compliance with data protection legislation. It remains for the ICO to enforce data protection legislation, and

¹⁵ The REC Code Manager will develop the REC Service User Categorisation and Assessment Document, which will set out whether and when categories of users must complete external assessments. For example, we expect that Third Party Intermediaries (TPIs) who are accessing data via the enquiry services will need to complete external assessment every 3 years. External assessment will involve the Code Manager reviewing the relevant policies and procedures, with sample checking to assess compliance with these documents.

for all REC Service Users to ensure they comply with data protection legal requirements when processing personal data.

Metering Equipment Managers

- 2.18. Later in this chapter we discuss in full our proposal to consolidate governance of matters relating to Metering Equipment Managers (MEMs) within the REC. In this section we focus on the treatment of MEMs in the Qualification and Maintenance Schedule.
- 2.19. As we propose that MEMs be Parties to the REC, and MEMs are in any event likely to be REC Service Users, we propose that the Qualification and Maintenance Schedule be mandatory for MEMs.
- 2.20. Currently electricity MEMs are subject to self-assessment and internal testing requirements in the BSC and accreditation under the MOCOPA. We propose later in this chapter that MEM activity and requirements associated with Metering Points registered within MPAS, otherwise known as SVA¹⁶ metering points, should move from the BSC to the REC. As such, we have replaced the existing SVA MEM qualification requirements in this schedule (see paragraphs 4.1, 5.1 and 6.1 of the schedule). Gas MEMs are not currently subject to entry qualification, although they are required to become accredited under the MAMCoP/AMICoP arrangements. We propose to extend the qualification requirements to gas MEMs in the REC, as they will be accessing the same or equivalent REC Services. We propose that this approach to MEM qualification will incorporate requirements covered by MAMCoP/AMICoP or MOCOPA accreditation which focus on the technical ability to work on metering systems, and the business solution assessment focusing on the ability to complete market processes (eg transfer of meter technical details).
- 2.21. We note the consolidation within the existing code arrangements of MAMCoP and AMICoP into the gas Metering CoP. When transferring this to the REC as part of v2.0 we are not intending to amend existing accreditation provisions immediately, but we

¹⁶ Supplier Volume Allocation, as described in the Balancing and Settlement Code (BSC)

acknowledge there is scope for further consolidation across gas and electricity which will be delivered at a later date, outside of the Ofgem-led SCRs.

- 2.22. For the avoidance of doubt, our approach to qualification for existing market participants at transition applies equally for MEMs as it does for suppliers and network companies. Namely, existing market participants at the point of transition (ie at the go-live of REC v2) will be deemed qualified under the REC, and will not need to complete market entry qualification under the REC. The qualification requirements will apply to any new entrants after REC v2 go-live. Requirements relating to maintenance of qualification will apply to all REC Parties.

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?

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

Market Exit

- 2.23. The Market Exit Schedule published alongside this document is a new schedule to the REC that has not previously been consulted on. We have developed this schedule with input from stakeholders via RDUG.
- 2.24. This schedule extends the provisions included in Clause 17 of the current REC Main Body, which covers expulsion of Parties from the code and considerations for Parties and REC Service Users seeking to exit the code voluntarily. The Code Manager is developing the end-to-end process for market exit, including the process for notifying parties and service providers of a Party's intention to withdraw from the code. This and other lower-level process documents will be consulted upon informally by the Code Manager outside of the Ofgem consultations, although we will pass on any views on this to the Code Manager (with the permission of the respondent).
- 2.25. We expect this schedule will be significantly expanded at REC v3, to include processes for handling a Supplier of Last Resort (SoLR) event once the CSS is operational. The processes themselves will be subject to stakeholder consultation via the Switching Programme Design Forum and decision at the Switching Programme Design Authority.

Prepayment Arrangements

- 2.26. We consulted on the dual fuel Prepayment Arrangements Schedule in June 2019. Twelve respondents commented on the schedule and we have given these comments careful consideration. There was overall support for the approach taken in creating a dual fuel schedule. However, some respondents felt further harmonisation of the gas and electricity drafting could be achieved. We have reviewed the schedule with this in mind, and have redrafted the legacy metering section to be dual fuel with carve-outs where the processes differ in gas and electricity.
- 2.27. Some respondents queried the applicability of the schedule to non-domestic gas suppliers, as they do not install prepayment meters. We have considered this further and engaged with stakeholders at RDUG. We have clarified in the schedule that while it is mandatory for non-domestic suppliers, the provisions only apply where a customer has a prepayment meter (or smart meter operating in prepayment mode). Where a non-domestic supplier does not have any prepayment customers, they will not be required to comply with the requirements of the schedule. We consider that it is not appropriate to carve out non-domestic suppliers from the schedule as the protections in the schedule should apply where a non-domestic supplier chooses to operate prepayment meters or smart meters in prepayment mode.
- 2.28. The Prepayment Schedule remains primarily a 'lift and shift' from the current arrangements, with changes made to improve readability. As described in the July 2019 consultation, we have introduced high level requirements focused on consumer outcomes to support the REC performance assurance arrangements.
- 2.29. We have updated the schedule to reflect changes to the MRA & SPAA since June 2019. In one instance, MAP CP 0338¹⁷, a change has been raised to the MRA without an equivalent change to the SPAA, despite it relating to a smart metering process that appears to be the same across gas and electricity. We have replicated this change in the REC as a dual fuel process, and invite comments from respondents if they feel this is not appropriate.

¹⁷ <https://www.mrasco.com/changes/change-tracker/application-of-utr-process-for-smets1-meters-enrolled-in-dcc/>

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

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?

Data Access Schedule

2.30. In June 2019 we consulted on an initial draft of the Data Access Schedule, covering provision of the Gas and Electricity Enquiry Services, provision of data to the Electricity Enquiry Service, arrangements for becoming an Enquiry Service User, and reference to the Data Access Matrix and process for amending the Data Access Matrix, which controls the data accessible to different categories of user.

2.31. We have carefully considered the views and detailed comments provided by respondents to our June 2019 consultation, and note that there was broad support for our proposed approach. We have developed the Data Access Schedule further with input from RDUG.

2.32. In the RCC SCR launch statement we confirmed that only the Electricity Enquiry Service (EES) would transition to REC governance at RCC/REC v2 go-live, with the Gas Enquiry Service (GES) following in REC v3. This is because the MRA, which currently governs the EES (known as ECOES), will close at RCC, whereas the GES (known as DES) is governed by the UNC which will endure beyond RCC. This approach minimises the change required to the UNC at RCC, and allows additional time for the separation of the GES from other services provided by Xoserve and for commercial agreements to be put in place with RECCo for the GES.

2.33. In addition to the changes outlined above, we have made the following changes since June 2019:

- Clarified that non-REC Parties will sign a standalone access agreement covering the Enquiry Services, CSS, and any other REC Service they require access to as reflected in the Qualification and Maintenance Schedule;
- Added clarity on the role of the REC Code Manager in administering the access agreements, based on this wider application;

- Amended references to the Technical Specification to reflect the actual documents where relevant;
- Included reference to the specific purpose for accessing data for each category of user; and
- Included a section on 'Additional Services' that Enquiry Service Providers may provide.

2.34. As discussed above, the Gas Enquiry Service will transfer to the REC at CSS go-live/REC v3.0. This service will be delivered by Xoserve via a commercial agreement with RECCo. Work is ongoing to understand the scope of the GES (for instance, whether the scope includes all data within the UNC Data Permissions Matrix), and develop an approach to managing access to data that is 'owned' by organisations that are not REC Parties (ie Shippers). This will be developed in consultation with RDUG and a proposed way forward will be included in our consultation on REC v3.0 in Spring 2021.

Unbilled Energy (formerly Theft) Code of Practice

2.35. In our June 2019 consultation we acknowledged the ongoing work of the Theft Steering Group (TSG), and we said we would await that group's conclusions before drafting a Theft Code of Practice (CoP) to replace the versions in SPAA and DCUSA.

2.36. After further consideration of the broader industry arrangements to handle unregistered sites, including theft investigations, we have concluded that the current CoPs to cover Theft and Unregistered Sites would be more appropriately combined into a single REC Schedule for Unbilled Energy. This recognises that in the course of a theft investigation it may be determined that the unbilled energy consumption was a result of a data error rather than theft, and that much of the CoPs relate to conduct of investigations before it has been proven that theft has occurred.

2.37. The gas arrangements relating to unregistered sites are not currently set out in a CoP, with policies left to each GT to determine for themselves. We have drafted the Unbilled Energy Code of Practice as a dual fuel schedule, extending the current electricity provisions to gas where appropriate. This is aimed at ensuring a standard approach so that consumers are treated fairly, irrespective of which network they happen to be connected to. We welcome views on whether this is appropriate and where it may be improved. We note that GT obligations are changing as part of RII02 and will review this schedule further in light of these changes in due course.

- 2.38. The Unbilled Energy Code of Practice issued alongside this document is a relatively early draft. Readers will note that it does not currently conform to the REC house style. We expect to update this Schedule shortly after this consultation and will continue to engage with stakeholders via RDUG.
- 2.39. We would draw respondents' attention in particular to Appendix 12 of the draft Unbilled Energy Code of Practice, which draws on the intent of SPAA CP473: Release of Shipperless and Unregistered data by the PPMIP.¹⁸ While we recognise that SPAA Parties voted to reject this modification, we have reviewed parties' responses to the consultations on the modification and consider that there may be value in including provision for the REC Performance Assurance Board to direct that such a reconciliation of data should occur at some time in the future. We welcome views on the inclusion of this process in the REC.
- 2.40. Another area that we would draw particular attention to is that containing the principles, set out in paragraph 3.6 of the Schedule. Following concerns raised with us by the Citizens Advice Service Extra Help Unit regarding disparities in consumer protections where a network investigates unbilled energy rather than a supplier, we have included additional principles to highlight that backbilling restrictions may apply where theft cannot be proven. We consider that, in general, a consumer should not be worse off by virtue of an investigation being conducted by a network rather than a supplier.
- 2.41. RECCo intends to establish a Theft Group, to replace the current Theft Issues Group (TIG) and TSG, likely ahead of REC v2 in September 2021.

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?

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?

¹⁸ <https://www.spaa.co.uk/change/release-of-shipperless-and-unregistered-site-data-to-the-ppmip/>

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?

Transfer of Consumer Data

- 2.42. In June 2019 we consulted on how we should incorporate the processes for the Priority Services Register (PSR) into the REC. We proposed moving most of the provisions relating to the PSR, which concern the population of data flows, to the REC Technical Specification, supplemented by a new REC Schedule to cover the high level data protection and consumer consent provisions, which do not fit the scope of the Technical Specification.
- 2.43. Twenty respondents commented on this proposal, and all were in agreement in principle with our proposal to consolidate the PSR provisions in the REC. Some respondents considered that work to move the PSR provisions to the REC should not disrupt or duplicate ongoing work to improve PSR data and consumer data sharing initiatives.
- 2.44. We have developed the Transfer of Consumer Data Schedule to cover the high level rules regarding the legal basis for sharing data and when data should be shared between parties. As initially proposed, the definition of the data flows and rules for population will be included in the Data Specification. This new schedule covers:
- Transfer of PSR between Suppliers and Network Operators, currently covered by D0225 and Annex C of the DTC and SPAA Schedule 42, and
 - Transfer of consumer contact details, currently covered by D0302 and SPAA Schedule 42.
- 2.45. In transferring these provisions to the REC we have identified some areas for improvement. For example, we have aligned the language of the schedule to the terminology used in the GDPR.
- 2.46. We note that SPAA Schedule 42 is elective for non-domestic gas suppliers, and have considered whether the Transfer of Consumer Data Schedule should be mandatory for non-domestic suppliers. As with other schedules such as the Prepayment Schedule, we have opted to make the schedule mandatory for non-domestic suppliers but with clear carve-outs where provisions only apply for domestic consumers. As in the current

arrangements, PSR obligations relate to domestic consumers only. However, we propose that provisions relating to customer contact details should apply to non-domestic consumers. The UNC already includes requirements relating to contact details for large supply point customers, so extending the requirements here to non-domestic customers closes a gap in the requirements between domestic and large non-domestic sites. We are seeking views on this proposal as part of this consultation.

2.47. We note that the existing gas provisions include use cases, limiting the use of consumer data provided to GTs. RDUG members queried whether equivalent restrictions were required in electricity. Data protection legislation requires that DNOs have a lawful basis for processing personal data. The GDPR lawful basis of “compliance with a legal obligation to which the controller is subject” includes compliance with regulatory requirements which are underpinned by statute (in this case, the obligation on Electricity Suppliers to share consumer contact information with DNOs). Further, DNOs’ activities are limited by their licence conditions, so they are naturally constrained from using the data for other purposes. Therefore, we do not consider that equivalent electricity provisions are required.

2.48. We have extended gas use case 5: Payment of Guaranteed Standard of Performance Payments, to clarify that customer information could be used for voluntary payments as well as mandatory payments. We welcome views on this in this consultation.

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?

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?

Metering Arrangements (including Metering Operations, Metering Accreditation, MAMCoP, AMICoP, MOCOPA, ASPCoP)

2.49. In our June 2019 consultation we consulted on our proposal to consolidate gas and electricity meter asset data and agent appointment processes, currently set out in the

SPAA and BSC, in the REC, and consolidate the metering services codes of practice¹⁹ in the REC. The consultation proposed that:

- MEMs should be parties to the REC as a prerequisite for accreditation under a metering services code of practice, to enable direct obligations and performance assurance to be placed on a MEM, particularly around data quality and provision of data for successful operation of industry processes.
- Gas and electricity meter asset data update and MEM appointment provisions would transfer to the REC with performance governed under the REC performance assurance framework.
- Metering services codes of practice are good candidates for rationalisation of governance under the REC. This consultation focused on the governance of the code of practice e.g. performance assurance and change management, rather than detailing the approach to consolidating the technical provisions.

2.50. We confirmed our intention to proceed with this proposal in the RCC SCR Launch Statement, and consulted further on whether MEMs should be required to be full parties to the REC, including full enfranchisement in the change management and performance assurance frameworks, in the REC v1.1 consultation in October 2020. The responses to this consultation proposal were overwhelmingly positive and we will continue to work with RECCo to enable MEM accession to the REC.

2.51. Our overarching policy intent is to harmonise gas and electricity metering provisions within the REC, providing a single set of obligations directly on MEMs with a robust performance assurance framework that holds MEMs directly to account. While full harmonisation is not expected to be achieved within the RCC SCR, we propose that the relevant metering provisions are transferred to the REC as part of the SCR, and that once included within REC governance it will be RECCo's responsibility to carry out further consolidation of provisions, subject to industry consultation.

2.52. In order to deliver this, further elaboration is required to clarify the low-level impacts associated with transferring provisions, identifying the approach against each of the

¹⁹ We refer to metering services codes of practice to differentiate from the Codes of Practice in the BSC. Metering services codes of practice covers: MOCOPA, MAMCoP, AMICoP, ASPCoP

existing products: to avoid future duplication of governance processes, duplication of requirements on suppliers and MEMs, and creating additional complexity.

2.53. The following documents are published alongside this consultation for comments and to aid understanding of our proposals relating to metering:

- REC Metering Operations Schedule
- BSC MEM traceability matrix²⁰
- REC Metering Accreditation Schedule
- REC Gas MEM Code of Practice (incorporating MAMCoP and AMICoP)
- Relevant sections of the REC Qualification and Maintenance Schedule

Transfer of existing metering provisions from BSC to REC

2.54. Whilst our previous publications set out Ofgem’s policy position at a high level, they did not provide details of how these provisions would be managed operationally, taking into account the full scope of metering provisions currently defined in the BSC such as the arrangements for rectifying faults and carrying out proving tests currently included in BSCP514; and the technical meter specifications currently included in the BSC CoPs for electricity.

2.55. We have worked with Elexon and RECCo to define and analyse options for transferring existing BSC metering provisions into the REC. Three options were identified:

- Option 1 Functional split – with operational processes associated with meter asset data updates and agent appointment transferring to the REC and meter technical CoP and associated controls retained in the BSC.
- Option 2 Meter type split – with provisions associated with advanced, complex and CVA²¹ metering retained in the BSC, and provisions associated with smart / traditional metering transferred to the REC.

²⁰ This is a working document, produced and maintained by Elexon, based on their understanding of the proposal to split requirements on MEMs across the BSC and REC in line with ‘Option 3’. The matrix can be considered a ‘best view’ as of the date of this consultation. Where policy decisions are uncertain, the matrix may not show a position.

²¹ Central Volume Allocation

- Option 3 Market split – with all provisions associated with metering systems registered in MPAS/SMRS (ie SVA) transferred to the REC and provisions associated with metering systems registered in CMRS (ie CVA) retained in the BSC.

2.56. Option 1, described as a functional split, was discounted at an early stage due to multiple shortcomings: requirements on MEMs being included in both the BSC and REC leading to inefficiencies in the delivery of assurance techniques such as qualification, plus a lack of clarity for MEMs in terms of the codes and associated governance applicable to the different categories of requirement.

2.57. To analyse options 2 and 3 a full review of BSC provisions identified different categories of product, which have been grouped together to understand how options 2 and 3 would be reflected within BSC and REC drafting. These categories include:

- High level provisions included in the BSC document itself.
- Operational processes delivered by MEMs as defined in BSCP514²² with associated process steps delivered by DNOs in BSCP 515²³.
- Technical meter specification requirements set out within the BSC CoPs and the associated processes and controls such as commissioning, testing and application for dispensations set out in CoP 4²⁴, BSCP601²⁵ and BSCP32²⁶.
- Performance assurance activities including qualification (BSCP537²⁷), technical assurance (BSCP27²⁸) and PARMS reporting (BSCP 533²⁹).
- Other metering related activities e.g. application of shared SVA metering systems (BSCP550³⁰) and bulk change of agent (BSCP 513³¹).

2.58. This detailed analysis found that the majority of BSC provisions are already split by SVA versus CVA. We also found that Option 2 would require a larger amount of

²² SVA Meter Operations for Metering Systems Registered in SMRS

²³ Licensed Distribution

²⁴ The Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes

²⁵ Metering Protocol Approval and Compliance Testing

²⁶ Metering Dispensations

²⁷ Qualification Process for SVA Parties, SVA Party Agents and CVA Meter Operators

²⁸ Technical Assurance of Half Hourly Metering Systems for Settlement Purposes

²⁹ PARMS Data Provision

³⁰ Shared SVA Meter Arrangement of Half Hourly Import and Export Active Energy

³¹ Bulk Change of NHH Supplier Agent

material, particularly operational processes, to be duplicated across the REC and BSC, requiring ongoing efforts to keep the two codes aligned.

2.59. We therefore consider that Option 3 presents the optimal split of requirements between the BSC and REC. The key benefits of this approach are:

- Option 3 provides a consumer centric approach with a consistent set of governance rules regardless of the type of metering system installed eg there is no impact where a supplier or consumer has chosen to install an advanced metering system to access more accurate consumption data and may in future switch to a SMETS compliant meter.
- Option 3 allows harmonisation of gas and electricity metering provisions within the REC, including the ability to develop a single qualification process for MEMs participating in retail arrangements.
- As MEMs will be required to accede to the REC, obligations will be assigned directly to MEMs. Option 2 would introduce additional complexity with the supplier hub principle reflected in the BSC for obligations relating to advanced meter operations and direct requirements in the REC.

2.60. Operational processes in BSCP514 and BSCP515 will transfer to the REC, with SVA MEM qualification included within the overall REC entry assessment arrangements (and removed from the BSC).

2.61. However, the position for the BSC CoPs is more complex. Provisions in the existing CoPs are applicable to both SVA and CVA metering systems, and the design of the BSC CoP governance means that transferring the CoPs to another code would require large volumes of historic versions of CoPs to be transferred (because the requirement is to comply with the CoP that was in place when the meter was installed).

2.62. We have considered two key questions relating to the BSC CoPs: Under which arrangements should the CoPs be governed? And where should the requirement to comply with the CoPs be established?

2.63. In relation to the first question of where the CoPs should be governed, we recognise that a review of the BSC CoPs is planned for early 2021 to consider the scope and boundaries between each CoP. We therefore propose to revisit this question following

the completion of that review. BSCP601 is linked to the CoP provisions, therefore the transfer of these arrangements will also be deferred until the conclusion of the CoP review.

- 2.64. While we recognise that compliance with the CoPs is crucial for maintaining settlement accuracy, we consider that accuracy of metered data is also important for consumer billing and switching, so there are arguments for both codes as to where the requirement to comply with the CoPs should sit. If this requirement remains in the BSC, then it is a requirement on suppliers as the registrants of the metering system, whereas in the REC it could be a requirement placed directly on the MEMs. As a third option, the requirement could be in both the REC and BSC, although this would require close engagement between the two codes' performance assurance regimes to ensure there was no duplication of assurance activity. In addition, there would need to be clarity over the route to request a derogation/dispensation against the requirement to comply, with this process clearly defined in just one of the codes.
- 2.65. Given that it is the MEMs who ultimately follow the requirements within the CoPs (although it is the responsibility of the Registrant, ie Supplier, to ensure that CoP compliant metering equipment is installed), we are minded to place the requirement to comply in the REC so that it can be placed directly on MEMs. However, we are seeking further evidence to inform this decision and welcome responses from parties in relation to this issue.
- 2.66. In addition to the question regarding the governance and compliance relating to the BSC CoPs, the development of the REC Metering Operations Schedule has highlighted a further question in relation to the definition of the processes relating to commissioning. BSCP514 currently defines the end-to-end processes delivered by MEMs (including interactions with Suppliers, Data Collectors and DNOs). This includes the process for commissioning new metering equipment, with the detailed commissioning requirements set out in BSC CoP4. Whilst the draft REC Metering Operations Schedule currently includes the process steps associated with commissioning, an alternative approach would be to capture this within BSC CoP4 alongside the technical requirements. We are therefore seeking industry feedback on the potential risks associated with the proposed approach.

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?

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.

Performance assurance of former-BSC provisions

- 2.67. The approach to qualification of MEMs is described earlier in this document under the REC Qualification and Maintenance Schedule section. In addition to qualification, the BSC currently includes a number of performance assurance activities which overlay the existing requirements. We consider that, in general, it is the responsibility of the BSC and REC Performance Assurance Boards (PABs) to determine which assurance measures are required to mitigate risks within each code.
- 2.68. The REC PAB is currently being established and will initiate evaluation of retail risks that should be mitigated under the REC. Both the REC and BSC PABs will need to work together to ensure the techniques applied under each code are complementary and do not duplicate requirements on market participants. Where possible, performance assurance techniques should be applied to those organisations who have responsibility for meeting the relevant obligations: for example, requirements on MEMs to send meter technical details should be assured through techniques applied directly to MEMs and requirements to accurately record metered energy volumes for use in settlements and customer billing/switching could be applied to MEMs or suppliers depending on the specific scenario.
- 2.69. Under the BSC, MEMs are subject to the Performance Assurance Reporting and Monitoring System (PARMS) and technical assurance audits. In addition, the scope of the BSC Audit currently includes assurance relating to metering operations activities delivered by SVA MEMs. A number of PARMS serials currently relate to the sending of meter technical details, a process that is moving to the REC, while technical assurance audits check that metering equipment has been installed correctly in accordance with the CoPs. It is unlikely that assurance techniques such as PARMS could be replaced in the REC from v2.0 go-live, due to the need to assess the REC risks and define performance techniques to be effective in mitigating these risks, as well as due to the lead times involved in developing and implementing any required industry reporting functionality. Similarly, with the technical assurance audits, further consideration will be needed, taking into account commercial arrangements currently in place with the relevant third party service provider. We also note that in July 2020 the BSC PAB

recommended³² that a Change Proposal be raised to cease some participant reported aspects of PARMS, including all PARMS serials currently in place for SVA Meter Operator Agents.

- 2.70. We therefore suggest that RECCo and BSCCo work together to develop a transition approach for performance assurance, which ensures no gaps are created in the assurance of MEM activities. This may mean that one code (the BSC) would assure activity set out in the other code (the REC), which would be a novel arrangement potentially requiring consequential drafting in the BSC and/or REC. An alternative approach would be to delay the transition of the operational metering provisions to the REC until the REC PAB is able to undertake assurance of these provisions. We consider that this is not an optimal approach as it would create further uncertainty for market participants.

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.

Transfer of RGMA Provisions

- 2.71. In June 2019 we set out that the Retail Gas Meter Arrangements (RGMA) Baseline and obligations in SPAA Schedule 22 should transfer to the REC. The alternative option was to transfer these provisions to the UNC; however, this was rejected because neither suppliers nor metering agents are UNC parties. We noted that SPAA Schedule 22 is not mandatory for non-domestic Suppliers, but that compliance with the RGMA Baseline is included in the I&C Code of Practice³³, so we consulted on whether the requirements in SPAA Schedule 22 should be mandatory for domestic and non-domestic Suppliers once transferred to the REC. All respondents to this question agreed with this proposal.
- 2.72. The Metering Operations Schedule published alongside this consultation includes the content from the RGMA Baseline and SPAA Schedule 22. The current RGMA Baseline

³² [PAB235A/02](https://www.elexon.co.uk/documents/groups/pab/2020-meetings-pab/236-september/pab235a-02-paf-review-data-provision/) (https://www.elexon.co.uk/documents/groups/pab/2020-meetings-pab/236-september/pab235a-02-paf-review-data-provision/)

³³ <https://www.icoss.org/uploads/publications/I&C%20Code%20of%20Practice%20February2019%20v3.0.pdf>

includes information relating to potential exceptions. These processes are not mandated, and engagement at RDUG suggests the information does not align to current industry practice. We have therefore excluded this in the REC drafting. We propose that the Code Manager reviews the information and that, if any of it is relevant and should be updated and retained in some way, it can be made available as lower level guidance rather than being part of the Schedule.

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?

Consolidation of metering services codes of practice

2.73. We have consolidated the metering services codes of practice into a Metering Accreditation Schedule setting out the accreditation requirements, governance processes and costs associated with each CoP. The scope of this schedule is limited to:

- (Gas) Metering Code of Practice (formerly MAMCoP and AMICoP, consolidated into a single gas MCoP by SPAA CP 17 407³⁴).
- Approved Metering Installer CoP (AMICoP).
- Meter Operation Code of Practice Agreement (MOCOPA).
- Automated Meter Reading Service Provider CoP (ASPCoP).

2.74. The schedule sets out generic requirements relating to becoming a MEM, followed by an appendix for each accreditation setting out the specific requirements of that scheme. This is largely a 'lift and shift' exercise, preserving the existing and accreditation and audits arrangements of each scheme where they (and therefore the detail of current audit contracts) differ, until such time as they can be replaced with a single new scheme.

2.75. More generally, the governance of the REC will apply to matters such as change control. We have therefore extended the right of a MOCOPA applicant to appeal a decision of the registration agent and/or auditor to the PAB, consistent with the PABs

³⁴ <https://www.spaa.co.uk/change/cp-17-407-alignment-of-metering-codes-of-practice/>

role on the gas CoPs. No changes are being made to the technical aspects of the CoPs as part of the RCC.

- 2.76. RECCo will stand up a Metering Group in 2021, which will advise on any change that should be made to the technical elements of the accreditation schemes, and work with the PAB on assurance. In time, the Metering Group will also work with RECCo to design a new consolidated accreditation scheme. This will be undertaken outside of any SCR process, and will be led by RECCo. The Metering Group, or a successor of it, will also have an enduring role in REC governance, having delegated authority over certain decision making in accordance with the Change Management arrangements. A draft of the Metering Group Terms of Reference that we propose to take effect with v2.0 of the REC is published in Appendix 1.
- 2.77. We are considering whether the Metering Accreditation Schedule should be amalgamated into the Metering Operations Schedule and welcome views on whether they should be consolidated or kept separate.

Smart Meter Installation

- 2.78. In June 2019 we consulted on whether some provisions of SMICoP should extend to metering-related site visits beyond the first smart meter installation. We also asked if any of the provisions within SMICoP could appropriately be extended to non-smart, or traditional, metering installations. Respondents' views were split on both questions. Several respondents commented that these proposals would increase industry costs, and some suggested that extending SMICoP beyond smart metering would duplicate requirements in other metering codes. We have carefully considered the arguments and have decided that, on balance, the scope of SMICoP should not be changed as part of RCC. This is without prejudice to any changes that may be made to the SMICoP or other metering codes of practice after RCC.
- 2.79. Following the June 2019 consultation, we have developed the Smart Meter Installation Schedule, which is published alongside this consultation. We have developed this with input from RDUG. Throughout the development of this schedule we have received suggestions to amend the provisions of the schedule and extend the scope of the requirements, particularly where these relate to installations at microbusiness premises. Consistent with our decision above, we have not incorporated these suggestions. We consider that these changes would be better considered via either the

existing governance processes within SMICoP, or by the future governance under the REC, and invite industry to raise such changes through those processes as they see fit.

- 2.80. In June 2019 we also asked for views on SMICoP governance and assurance provisions, and how these should be treated under the REC. Overall, respondents supported governance of SMICoP being managed in line with the change management arrangements for the rest of the REC. Views regarding assurance were somewhat split, with some desire to retain the existing SMICoP assurance techniques, although most respondents who commented on this were supportive of the REC Performance Assurance Board (PAB) overseeing SMICoP assurance. We have decided to subject the Smart Meter Installation Schedule to the standard change management processes set out in the Change Management Schedule. With regard to assurance, we have decided to retain the customer survey and audit requirements that are part of the current SMICoP, with the PAB being responsible for overseeing these processes. The existing annual self-certification will be captured by the wider annual statement of compliance as part of the maintenance of qualification arrangements.
- 2.81. Through RDUG reviews of the schedule, queries were raised on the applicability of the schedule to all domestic and microbusiness suppliers. The exclusions for microbusinesses within appendix A1 of the SMICoP have been reflected within the schedule; for example, provisions relating to vulnerable consumers do not apply to microbusiness suppliers. The SMICoP currently includes the concept of “SMICoP members”. In drafting the REC schedule we have discarded the concept of “members” of SMICoP and instead referred to Energy Suppliers. Where the provisions of SMICoP are limited to suppliers with a certain number of customers, or suppliers installing a certain number of smart meters, these restrictions have been included in the REC drafting. For example, we have retained the provision setting out that suppliers with fewer than 10,000 customers need not be subject to an audit. Outside of these specific restrictions, all Energy Suppliers installing smart meters are required to be compliant with the provisions of SMICoP as a condition of their licence.

Secure Data Exchange Service

- 2.82. The Secure Data Exchange Service (SDES) incorporates three services used by market participants to satisfy their obligations under the MRA and SPAA:
- Secure Data Exchange Portal (SDEP): used by Suppliers and DNOs for operational escalation communications.

- **Crossed Meter Resolution:** used by Suppliers and MEMs to resolve crossed meters.
- **Import/Export MPAN Creation:** used by Suppliers requesting additional MPANs from DNOs.

2.83. The SDES Schedule sets out the requirements for the provision of the service, arrangements for becoming an SDES user, assurance and monitoring activities, and terms of use. The content is based on the existing access agreement. This Schedule has not been previously consulted on, although it was published in the July 2020 package of working drafts. The version published alongside this consultation is change marked against the July 2020 version.

2.84. We have discussed this schedule with RDUG members. Through that review, a concern was raised regarding the liabilities, where paragraph 2.4b states that RECCo must provide the SDES but shall not be liable to a User for any delay or failure to provide, supply or obtain access to the SDES. This drafting reflects the existing SDEP access agreement. We have considered further with RECCo whether this provision remains appropriate following transition to the REC. While the REC is explicit as regards inter-Party liability, the REC Charging principles implicitly dictate that in the event of a service failure by a RECCo service provider and where such failure generates service credits or liquidated damages payable to RECCo, such service credits will be passed onto the REC Parties. The charging model under the REC means that all costs are recovered in proportion to market share, so in the event that a single SDES user is impacted by a service failure, and assuming such failure would generate a service credit under the RECCo service provider contract, such service credit would not flow directly to impacted REC Party but instead be socialised across all charges to all REC Parties. We have therefore retained the drafting relating to liabilities.

Green Deal

2.85. In June 2019 we consulted on whether to consolidate the Green Deal Arrangements Agreement (GDAA) into the REC, or leave the GDAA as a standalone code. In our RCC SCR launch statement we confirmed our intention to bring the GDAA into the REC, alongside the Green Deal-related MRA provisions.

2.86. In November 2020 we published our proposed approach to the Green Deal-related licence conditions. In that consultation we confirmed that the Department for Business,

Energy and Industrial Strategy (BEIS) has agreed that putting the GDAA into the REC is sufficient to meet the requirements of the Green Deal framework.

2.87. We have produced a Green Deal Schedule and Green Deal Central Charge Database (GDCC) Service Definition for inclusion in the REC. Between them, these documents cover the requirements in the existing GDAA, MRA including MRA Agreed Procedures (MAP) 18 and 20, and Green Deal Operational Procedures (GDOPs).

2.88. The Green Deal Schedule is comprised of five sections, summarised in Table 1.

Table 1: Green Deal Schedule

Section	Title	Description
Part A	Introduction and Regulation	Explains the content of the schedule and how it links to the Framework Regulations.
Part B	Becoming a Green Deal User	Explains the onboarding arrangements for new parties and the associated rights and obligations.
Part C	Operational Processes	Explains the processes for establishing Green Deal Plans and the associated data.
Part D	Charges and Remittance	Explains the process for Green Deal Charging and Remittance, plus Quarterly Charges.
Part E	Performance Assurance	Explains the performance levels and the interaction with the PAB

2.89. In transferring the Green Deal requirements to the REC we would draw stakeholders' attention to four key changes to the Green Deal arrangements. First, we have removed gas suppliers, the energy efficiency helpline, and green deal cashback representatives as potential users. This is to provide a clear baseline, clarifying the organisations who are currently engaged with the Green Deal arrangements and that a change to the REC would be required to extend these provisions further. Second, we have made provision for quarterly payments to offset RECCo costs, rather than making the payments directly to suppliers. Historically the value of these payments has been relatively low, so it is more efficient to discount these from a bill rather than administer a complex arrangement to pay funds to each relevant supplier.

2.90. The remaining two key changes relate to the role of the PAB. We have made provision for the PAB to determine compensation payments, based on the existing performance reporting with regard to Green Deal arrangements. We have also made provision for

the PAB to process any appeals in relation to the onboarding arrangements for the Green Deal.

Transition Schedules

- 2.91. There are three Transition Schedules to the REC: The REC Transition Schedule, the SPAA Transition Schedule, and the MRA Transition Schedule. We set out our approach to the MRA and SPAA transitions in RCC SCR Launch Statement. In summary, the MRA and SPAA Transition Schedules house the requirements that will cease to be relevant at CSS go-live, ie those that relate principally to the existing switching arrangements. The MRA Transition Schedule also houses the existing MPAS provisions, which will be disaggregated at CSS go-live as explained in the RCC Launch Statement.
- 2.92. The SPAA Transition Schedule published alongside this consultation is change-marked against the version published in July 2020. The comments in the document indicate where the requirements have come from in the SPAA. The MRA Transition Schedule is also change-marked against the July 2020 version. Gemserv have provided a traceability matrix to aid review of the MRA Transition Schedule, which is published alongside this consultation.
- 2.93. The REC Transition Schedule is currently in effect in REC v1.0, placing requirements on Parties with regard to delivering the Switching Programme. The updated version of the Schedule published alongside this consultation is change-marked against the version published in July 2020. The primary update for REC v2.0 since July is the addition of provisions relating to the consolidation of metering arrangements in the REC, as described earlier in this chapter. Another section relating to the consolidation of theft provisions is expected to be implemented in REC v1.1 (decision due in December 2020).

Charging Principles

- 2.94. REC v2.0 will include a Charging Principles schedule, which will set out the principles to be applied by RECCo when developing a charging statement. Under REC v1.0 only Suppliers contribute to the REC budget. Our overall intention for charging at v2.0 is to maintain the current arrangements. This means that other parties will start to contribute to REC costs, for example DNOs in respect of the provision of the EES, and metering agents with regard to the costs of their audits. As noted earlier in this Chapter, we expect RECCo to consolidate audit services during 2021 which should allow for efficiency savings to be passed through to metering agents.

2.95. A Charging Principles schedule will be developed in early 2021 and will be considered at RDUG.

Performance Assurance

2.96. It is expected that the Performance Assurance Schedule will be designated as part of REC v1.1. The v1.1 iteration of the Schedule provides for the Code Manager to set up the PAB; however, it does not contain the details of the Performance Assurance Framework (PAF), as this will be developed by the Code Manager over 2021. The PAF will be consulted on informally by RECCo in 2021.

3. Consequential Changes to Other Codes

Questions

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.

- 3.1. Implementation of the REC v2.0 and RCC SCR will impact on several existing industry codes. This chapter sets out a summary of the changes that are required to each of the impacted codes in order to ensure alignment with REC v2.0 and the RCC SCR. Code bodies have developed the legal drafting provided in Appendix 2. More detail on the RCC SCR process is covered later in Chapter 5.
- 3.2. This chapter also sets out the drafting to support the Cross Code Steering Group (CCSG), which we expect to be inserted into the consequential changes for the BSC, DCUSA, UNC, IGT UNC and SEC.

Cross Code Steering Group

- 3.3. The RCC SCR scope set out our intention to make changes to multiple codes to facilitate better cross-code change management. Our REC v1.1 consultation set out further detail on our proposals to establish a Cross Code Steering Group and to make provision for code administrators to be able to raise consequential changes to other codes. The REC will not have restrictions on who can raise a change proposal, therefore permitting the code administrator of another code to raise a REC change. We asked for views in our consultation on whether code administrators and managers should be able to raise any changes identified as necessary by the CCSG.
- 3.4. We have carefully considered the responses we received. The vast majority felt this would be an improvement on current processes, increasing efficiency of cross-code change. A small number of respondents considered that this provision should be used in limited circumstances only, and some expressed concern at code administrators being able to raise changes to codes of which they have little knowledge or understanding. Taking this into account, we still consider that the REC Code Manager should be able to raise consequential changes to the other codes. However, we now

propose that code administrators of other codes should only be able to raise changes to their own codes. We consider that this approach minimises the risk of poorly drafted consequential changes being raised to codes, balanced against the risk that a code administrator could become a bottleneck for change.

- 3.5. We note that a recent SEC modification, SEC MP088³⁵, sought to give SECAS (the SEC code administrator) the power to raise modifications to the SEC, and that this modification was rejected by Ofgem.³⁶ We consider that the proposals relating to cross code change are materially different to SEC MP088, as code administrators would be restricted to raising only changes that have been identified by the CCSG as necessary to allow a lead change to progress.
- 3.6. We have developed the following generic drafting be adapted for inclusion in the BSC, DCUSA, SEC, UNC and IGT UNC. Note, this drafting will be subject to further development following consideration of the responses to this consultation. The intent of this drafting is:
- To provide reciprocal requirements for the REC Code Manager to raise changes under other codes on the basis that anyone can raise changes under the REC. This will allow the REC Code Manager to raise a consequential change where it is identified.
 - To embed the Cross Code Governance Steering Group, ensuring each code puts forward one or more suitable representatives and abides by the principles that have been set out in the REC.
 - To embed the centralised Energy Market Data Specification as being the repository of information relating to data items and market messages with individual codes retaining control of the data where they are the metadata owner.

Definitions

Each code to define:

- **Cross Code Steering Group** – means the group of that name described in [insert location of the change management provisions in this code]

³⁵ <https://smartenergycodecompany.co.uk/modifications/power-to-raise-modifications/>

³⁶ https://www.ofgem.gov.uk/system/files/docs/2020/09/secmp088_d.pdf

- **Energy Market Data Specification** – with reference to the definition in the REC.
- **REC Code Manager** – with reference to the definition in the REC.
- **Energy Codes** - means a code or agreement maintained pursuant to one or more of the Energy Licences.
- **Data Item** – means the most granular level of data defining a specific attribute in respect of a data type, the permissible values for which are defined and controlled in the Energy Market Data Specification.
- **Market Message** – to be defined with reference to interfaces between market participants and central service providers or other market participants.
- **Meta Data Owner** – means an Energy Code responsible for the control of the meta data associated with the Data Item or Market Message. Changes to the meta data are administered via the change management or modification process under the relevant Energy Code, in conjunction with the REC Code Manager's administration of the Energy Market Data Specification as described in the REC Change Management Schedule.

Cross Code Steering Group

The [Code] Panel shall ensure that one or more representatives are included in the Cross Code Steering Group, with appropriate skills, knowledge and experience to participate in accordance with the Cross Code Steering Group Terms of Reference.

The core roles of the Cross Code Steering Group shall be to:

- (a) provide views on whether a potential change to one Energy Code is likely to have an impact on any other Energy Codes or on the parties to those codes;
- (b) determine whether a potential change to one Energy Code is likely to require a parallel or consequential change to another Energy Code; and
- (c) where a potential change to one Energy Code is likely to require a parallel change to another Energy Code, determine which Energy Code is to be used as the lead-code for the change and which organisation shall raise the consequential changes to other codes.

Where the Cross Code Steering Group determines that this Code is to be used as the lead-code for a Change Proposal, then the [insert relevant code term] shall progress that Change Proposal in accordance with this Code, and shall coordinate with the code administrators of the other affected Energy Codes so that they can manage the processes under their Energy Codes in parallel with the process under this Code.

Where the Cross Code Steering Group determines that another Energy Code is to be used as the lead-code for a [Change Proposal/Modification], then the [insert relevant code term] shall progress that Change Proposal in accordance with this Code, but subject to the following:

(a) the [insert relevant code term] shall progress the [Change Proposal/Modification] in parallel with the change under the lead-code, and subject to the timetable determined under the lead-code;

(b) the decision in relation to the [Change Proposal/Modification] under this Code shall not be a decision as to whether or not to approve the [Change Proposal/Modification] or as to whether or not to recommend approval to the Authority, and shall instead be treated as a recommendation under the lead-code; and

(c) the [Change Proposal/Modification] shall be approved if the change under the lead-code is approved, and rejected if the change under the lead code is rejected (subject to any appeal mechanism under the lead-code).

Raising Change Proposals

Each code is to include a paragraph allowing the REC Code Manager and that code's code administrators to raise changes where a consequential change to this Code has been identified by the Cross Code Steering Group.

Data Specification

The [Code Panel / Secretariat etc] shall ensure that the meta data for all relevant Market Messages and Data Items utilised under this Code are defined within the Energy Market Data Specification administered in accordance with the REC Change Management Schedule.

Where a [Change Proposal / Modification] is progressed in relation to a Market Message and/or Data Item defined within the Energy Market Data Specification, the relevant Meta Data Owner shall be defined as the lead code [with reference to the Cross Code Governance paragraph]

- 3.7. We are considering further the impact of this drafting on the right of appeal to the CMA where the Authority decision on a modification is contrary to the Panel recommendation. Our intention is not to dilute the appeal rights for consequential changes, and we will consider whether additional drafting is required to this effect with the code bodies alongside this consultation.

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.

MRA

- 3.8. The changes to the MRA reflect the agreement closing down at RCC SCR implementation, with the majority of MRA provisions being removed and either transitioned to the REC or DCUSA, or replaced by new REC provisions. The changes are therefore to remove the BSC Agent as a party, and to delete all redundant clauses, schedules and MRA products. There are several clauses and schedules that will be retained after RCC SCR implementation, in order that an orderly closedown of the MRA and MRASCo can be facilitated.
- 3.9. Changes are shown in the consequential change drafting which are subject to the changes proposed in MRA CP 0267³⁷ (Amendments to facilitate the closedown of the MRA and MRASCO). This change proposal is currently with the Authority pending decision.

SPAA

- 3.10. The changes to the SPAA reflect the agreement closing down at RCC SCR implementation, with the majority of SPAA Schedules removed and transitioned to the REC either within the SPAA Transition Schedule or dedicated REC Schedules such as the Prepayment Arrangements Schedule.
- 3.11. Changes are shown in the consequential change drafting which are subject to the changes proposed in SCP 506³⁸ (SPAA Closure). This change proposal is currently with the Authority pending decision.

³⁷ <https://www.mrasco.com/changes/change-tracker/amendments-to-facilitate-the-closedown-of-the-mra-and-mrasco/>

³⁸ <https://www.spaa.co.uk/change/spaa-closure/>

SEC

- 3.12. Changes to the SEC under the RCC SCR are minor in that they are related to minor cross-referencing and definition updates.

UNC and IGT UNC

- 3.13. The main changes to the UNC and IGT UNC are to remove references to SPAA and add definitions where appropriate to the REC.

BSC

- 3.14. Changes to the BSC are mainly changing references from MRA/MRASCo to REC, and references to the DTC replaced with references to the EMDS. A temporary clause has also been added to Section K in relation to MPAS charges.
- 3.15. The BSC consequential changes published alongside this consultation do not reflect the proposed approach to metering operations set out in Chapter 2. These additional changes will be developed in early 2021, and will be considered by industry within the BSC governance and Switching Programme governance (ie RDUG). The BSC Traceability Matrix in Appendix 2 provides an indication as to where changes will be required in the BSC.

DCUSA

- 3.16. Changes to the DCUSA required at RCC SCR are related to the removal of the provisions related to theft, a new schedule created to accommodate MAP21 (Disconnections), and references to MRA, MRASCo and DTC have been removed and replaced with references to the REC Transition Schedule.

4. REC Technical Specification

Questions

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”?

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)?

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?

Introduction

- 4.1. We consulted in November 2019 on our approach to the REC Technical Specification. We proposed that the REC Technical Specification should comprise:
- A data specification
 - Service definitions
 - Testing arrangements
 - Security and data protection requirements.
- 4.2. This chapter summarises how we have developed the Technical Specification artefacts that are published alongside this consultation. We have carefully considered the responses to the November 2019 consultation and we discuss our response to material comments at the relevant points in this chapter.
- 4.3. Updates to the testing arrangements and security and data protection arrangements are provided in Chapter 2 of this document, in the REC Qualification and Maintenance Schedule section.

Data Specification

- 4.4. 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. The Data Specification also contains a Data Access Matrix³⁹ 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.
- 4.5. The majority of respondents to the November 2019 consultation were supportive of the overall proposal to develop the Data Specification, although there was some concern about the proposed timelines given the scope and scale of work to be delivered. We have worked with code bodies to deliver the Data Specification. UNC data such as UK Link File Formats is not yet captured. We have agreed with Xoserve to capture the UNC data in early 2021, and this will be included in the REC Data Specification at v2.0. Note that governance of the Gas Enquiry Service will not transition to REC until v3.0 (CSS go-live).
- 4.6. We have developed the Data Specification artefacts, which are published in Appendix 3 to this consultation. These artefacts should be considered to be 'transitional' documents, transferring existing data catalogue content into the REC (alongside the new CSS messages). The format does not reflect the final product, which will be the Energy Market Architecture Repository (EMAR), 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. Elements of the activity such as the establishment of data mastership have not been undertaken by Ofgem and will be addressed by the REC Code Manager during their build of 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 will conduct further engagement with stakeholders on the development of the EMAR in early 2021.

³⁹ Electricity only for REC v2.0

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”?

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)?

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?

Service definitions

- 4.7. 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 PAB will use to hold it to account on performance. The vast majority of respondents to the November 2019 consultation were supportive of this approach to the Service Definitions. We have carefully considered the detailed responses received and where appropriate have added clarifications to the Service Definitions. We note that commercial terms for providing services are a matter for RECCo and will not be set out in the Service Definitions.
- 4.8. There are four Service Definitions within the scope of REC v2.0: Central Data Service Provider (CDSP) Further Services Service Definition, Green Deal Central Charging Database (GDCC) Service Definition, Secure Data Exchange Service (SDES) Service Definition and Electricity Enquiry Service (EES) Service Definition. These have been developed in consultation with RDUG and the relevant service providers, and are published alongside this consultation. We welcome comments on the Service Definitions, and have provided a spreadsheet pre-populated with a tab for each document and space to provide comment on specific provisions.
- 4.9. The remaining REC v3.0 Service Definitions will be consulted on in the REC v3.0 consultation in Spring 2021.

CDSP Further Services Service Definition

4.10. The CDSP currently provides Third Party Services to non-DSC⁴⁰ Parties. The CDSP Further Services Service Definition sets out three distinct reporting services which are currently provided to SPAA Ltd:

- Centralised reporting of Meter Updates (currently SPAA Schedule 22)
- Meter data reconciliation activity (currently SPAA Schedule 22)
- Provision of historic market share data to PPMIPs⁴¹ (currently SPAA Schedule 43)

4.11. These services link to processes set out in the REC Metering Operations and REC Prepayment Arrangements Schedules. The Service Definition reflects the requirements in SPAA Schedules 22 and 43.

GDCC Service Definition

4.12. The GDCC Service Definition sets out the requirements for the service delivered by C&C, which from REC v2.0 will be delivered via a direct contract with RECCo. The key functions of the GDCC are:

- To pass Market Messages between Green Deal Providers, Electricity Suppliers, and MPAS Providers, via defined DTN messages,
- To exchange data between the GDCC and the relevant EPC Register at various points in the lifecycle of the Green Deal Plan,
- To store Green Deal Arrangements Data with associated effective dates, and make it available to authorised Green Deal Users, and
- To create reports that provide the total number of days in a given quarter that a Green Deal Provider or Green Deal Finance Party is liable to make a payment in respect of each Green Deal Plan that it is associated with for all or part of that quarter.

⁴⁰ Data Services Contract

⁴¹ Prepayment Meter Infrastructure Provider

SDES Service Definition

- 4.13. This Service Definition contains general provisions applicable to all three aspects of the SDES (see SDES section of Chapter 2, above), followed by separate sections defining the users and functionality applicable to each individual aspect of the SDES. The Service Definition reflects the approved and published User Requirements Specification (URS) published on the MRA website.⁴²
- 4.14. Information regarding the use of SDES within defined business processes is included in the SDES Schedule. Similarly, information on the data to be included within specific messages sent using SDES is included in the Data Specification.

EES Service Definition

- 4.15. The EES Service Definition covers access to the EES via the web service, APIs and bespoke functionality linked to prepayment transactions.
- 4.16. In November 2019 we consulted on some specific policy proposals relating to the EES. First, we proposed the removal of the Supplier Access Matrix, which allows the Registered Supplier to control the data that other Suppliers and Supplier Agents can access. All respondents who answered this question supported removal of the Supplier Access Matrix and associated provisions. This is reflected in the EES Service Definition.
- 4.17. Second, we consulted on whether the monthly electricity and quarterly gas downloads of data should be removed when the respective services transfer to the REC. As the EES transfers at REC v2.0, this would mean removal of the monthly electricity consolidated report in September 2021. The gas equivalent would be removed at CSS go-live in 2022. The majority of respondents were supportive of the initiative to move to using the most up to date information via APIs, rather than relying on reports which will be out of date as soon as they are issued. However, there was significant concern about the timing of the removal. This issue was considered further by IREG⁴³, and we subsequently agreed that the removal of the electricity report would be delayed until

⁴² Available here: <https://www.mrasco.com/sdep-3/>

⁴³ Issues Resolution Expert Group under the MRA

CSS go-live. This means that both the electricity and gas downloads will be removed at the same time.

- 4.18. IREG identified an additional use case for the monthly downloads, relating to DNOs needing to identify IDNO MPANs on their networks. We are continuing to work with DNOs to identify the best way to serve this use case once the monthly report is removed. This may be the creation of a new report with fewer data items than the current report.

5. Retail Code Consolidation SCR process and Next Steps

- 5.1. Subject to, and taking into account, the views expressed by stakeholders in response to this consultation and other relevant considerations, we will aim to complete any revisions to the REC v2.0 content before 30 April 2021. We anticipate that the REC v2.0 content will from that date onwards be considered stable and we would intend therefore to submit RCC SCR modification proposals to the respective code panels on that basis.
- 5.2. In our launch statement for the RCC SCR, we said that we would take pathway three for this SCR whereby Ofgem leads an end-to-end process to develop code modifications. In line with the SCR guidance, we have worked with code administrators and stakeholders, mostly in RDUG on the modification proposals and are now consulting on them. We have planned the next phases of the SCR, after this consultation and the consideration of responses, to be as follows:
- **30 April 2021:** Ofgem puts the code modification proposals to the respective code panels
 - **18 June 2021:** Code panels provide a response to the proposals to Ofgem
 - **2 July 2021:** Ofgem issues a decision on the code modifications
- 5.3. This means that code panels of the codes to which consequential changes are being made will be expected to consider and take views on the consequential changes between 30 April and 18 June 2021. We will work with colleagues in code bodies to coordinate panel procedures for consideration of the proposals in line with these timelines.
- 5.4. We aim to designate REC v2.0 on 2 July 2021, with the code taking effect on 1 September 2021.

Appendices

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1	REC v2.0 Documents	55
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4	Privacy Notice	58

Appendix 1 – REC v2.0 Documents

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REC Data Access Schedule
REC Green Deal Arrangements Schedule
REC Prepayment Arrangements Schedule
REC MRA Transition Schedule
REC Metering Operations Schedule
REC Market Exit Schedule
REC Qualification and Maintenance Schedule
REC SPAA Transition Schedule
REC Secure Data Exchange Service
REC Smart Meter Installation Schedule
REC Transfer of Consumer Data Schedule
REC CDSP Further Services Service Definition
REC GDCC Service Definition
REC EES Service Definition
REC Secure Data Exchange Service Definition
REC Metering Accreditation Scheme Schedule
REC Unbilled Energy Code of Practice ⁴⁴ : DCUSA: https://www.dcusa.co.uk/guidance-and-information/ SPAA: https://www.spaa.co.uk/process-documents/
REC Transition Schedule
REC Interpretations Schedule
REC Gas Metering Code of Practice
Metering Group Terms of Reference
Cross Code Steering Groups Terms of Reference

⁴⁴ The current Theft Codes of Practice are restricted for viewing by DCUSA and SPAA parties only. We have therefore provided links to where the draft Unbilled Energy Code of Practice is hosted on the SPAA and DCUSA websites.

Appendix 2 – RCC SCR Consequential Changes

Link
SPAA
MRA
DCUSA
BSC
SEC
IGT UNC
UNC
MRA Traceability Matrix
BSC MEM Traceability Matrix

Appendix 3 – REC Data Specification

Link
REC Data Specification

Appendix 4 – 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. Similarly, the consequential changes to codes are being developed by the respective code bodies, so we may share non-confidential responses relating to the consequential changes to other codes with the relevant code administrators.

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 (Note that this cannot be claimed if using Survey Monkey for the consultation as their servers are in the US. In that case use “the Data you provide directly will be stored by Survey Monkey on their servers in the United States. We have taken all necessary precautions to ensure that your rights in term of data protection will not be compromised by this”.

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. (If using a third party system such as Survey Monkey to gather the data, you will need to state clearly at which point the data will be moved from there to our internal systems.)

9. More information For more information on how Ofgem processes your data, click on the link to our “[Ofgem privacy promise](#)”.