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Action	For Decision

Switching Programme Consequential Changes

This paper provides SPAA Executive Committee members with a summary of the key impacts on the SPAA as a result of the Faster More Reliable Switching Programme and other code consolidation activities.

1. Summary

- 1.1 On 15 October 2018, Ofgem published its latest Switching Programme Regulation and Governance consultation document¹. Draft REC V2 Schedules were included as Annexes to this consultation, including several REC Schedules reflecting information currently included within the SPAA.
- 1.2 The consultation document also re-iterated Ofgem's view regarding REC V3, stating that this will incorporate the remaining provisions from the MRA and the SPAA, providing a significant opportunity for code consolidation and rationalisation. REC V2 and V3 separate those provisions which are to be given effect through the Switching Significant Code Review (SCR) (REC V2) and those which continue to sit outside of the scope of the programme and must therefore be implemented through alternative means (REC V3). Ofgem intends to progress the development and, to the extent possible, the subsequent implementation of both of these packages at the same time.
- 1.3 The consultation includes a request that initial assessments of the consequential impacts on each industry code resulting from the implementation of the new switching arrangements should be completed by the end of the year, in order that drafting may be completed by the end of March 2019. This paper sets out the results of the initial SPAA impact assessment and provides a planned approach to enable SCR drafting to be delivered to Ofgem in March 2019.
- 1.4 Appendix 1 shows each SPAA Schedule and identifies whether its contents become redundant with the closure of SPAA, will be migrated as part of the Switching (REC V2) SCR or the Code Consolidation (REC V3) SCR.

¹ [Switching Programme: Regulation and Governance - way forward and statutory consultation on licence modifications](#)

2. REC V2 SCR Changes

- 2.1 The Switching SCR should incorporate consequential changes to existing industry codes as a result of the new switching arrangements. From a SPAA perspective, the majority of Switching SCR changes will result from the migration of provisions from SPAA to the REC, with SPAA Schedules being classified as 'Not Used'. However, the switching arrangements may result in changes to SPAA Schedules which are not expected to migrate into REC V2. These changes have been highlighted separately to ensure they are not missed when the bulk of the provisions migrate as part of the REC V3 SCR.
- 2.2 Attachment 1 provides details of proposed SCR changes. In summary this includes:
- Amendments to definitions relating to provisions in REC V3 Schedules – definitions to be amended to reflect the new terminology.
 - Minor changes to the RGMA Baseline document to reflect the new end to end switch process – redlined drafting to be considered by the RGMA Faster Switching Review Group in February.
 - Changes to Schedule 18 'Market Domain Data' to remove the management of Market Participant Data. Note, this may be progressed ahead of the implementation of REC V2 and is subject to a joint SPAA and UNC Working Group.
 - Changes to Schedule 24 'Publication of Operational and Escalation Contact Information' to remove the requirements to provide contacts relating to provisions that are migrating to the REC.
 - Changes to Schedule 23 'Provision and Utilisation of DES and other supply point information services' may be required if the provisions are not fully migrated as part of the REC V2 SCR.
- 2.3 It is understood that Ofgem will be publishing all the proposed SCR changes following submission in March 2019, therefore we do not propose that the SPAA changes highlighted above be issued for industry consultation or Change Board approval. Redlined changes to each of the impacted Schedules will be legally reviewed in Q1 2019 and provided to the SPAA EC in March for final agreement ahead of submission to Ofgem.

3. REC V3 Code Consolidation

- 3.1 The migration of the remaining SPAA provisions into the REC, or another suitable industry code, has been classified as REC V3 changes. This section summarises each of these in turn, highlighting the latest policy position provided by Ofgem and the expected deliverables for March 2019.

Theft

- 3.2 The following SPAA Schedules include provisions relating to theft of gas:
- Schedule 33 'Theft of Gas Code Practice'
 - Schedule 34 'Theft Risk Assessment Service'
 - Schedule 37 'Energy Theft Tip-Off Service'
 - Schedule 39 'Gas Theft Detection Incentive Scheme'

- 3.3 Ofgem have indicated that they expect theft provisions to migrate into REC V3. Work is underway to consider the most appropriate timing for this migration, taking into account the timescales within which the TRAS and ETTOS contracts are due to be renewed. Further work is also being progressed to measure the effectiveness of the existing theft provisions, including an independent value for money assessment of TRAS and analysis to determine whether the incentive scheme apportionment is fair and equitable. Both activities are due to complete in early 2019, which will feed into a report setting out proposals in relation to the future vision for theft arrangements by end March 2019. This can be provided to Ofgem alongside the other REC proposals.

Meter Agent Appointment and RGMA Update

- 3.4 As highlighted in section 2, minor changes to the RGMA Baseline will be required to reflect the new switching arrangements as part of the REC V2 SCR. The migration of these provisions, along with the high level requirements in SPAA Schedule 22 'Metering Schedule' will take place as part of the REC V3 SCR.
- 3.5 Ofgem have indicated that these provisions should transfer into the REC to ensure that they are captured by the performance assurance provisions. Discussions are also taking place regarding the potential to harmonise the gas agent appointment and meter update processes within the RGMA with the equivalent electricity processes in the Balancing and Settlement Code Procedure (BSCP) 514.
- 3.6 It is assumed that the existing SPAA process for updating the Meter and Converter Product Tables within Schedule 18 'MDD' will be transferred to the REC alongside the RGMA Baseline which uses the data held within these tables.
- 3.7 The expectation is that a draft REC Schedule will be developed by March 2019 covering the provisions in SPAA Schedule 22 and the RGMA Baseline.

Metering Codes of Practice

- 3.8 Work is continuing with the amalgamation of the Meter Asset Manager Code of Practice (MAMCoP) and Approved Meter Installer Code of Practice (AMICoP). This is expected to result in a single gas metering code of practice and a consolidated governance schedule (to replace SPAA Schedules 32 'Meter Asset Manager Arrangements' and 40 'Approved Meter Installer Arrangements').
- 3.9 Ofgem's October consultation sought views on whether the gas code of practice should be harmonised with the electricity provisions included in the Meter Operator Code of Practice (MOCOCoPA) and also whether they should migrate to the REC. Discussions in this area are ongoing, therefore the expectation is that by March 2019 there will be a clear policy position from Ofgem on the future of these provisions.

Data Catalogues

- 3.10 At present the SPAA hosts the RGMA Data Flow Catalogue (DFC) and the Supplier DFC. ElectraLink is also working with Xoserve to develop a single gas data catalogue with governance provisions within both the SPAA and UNC (similar to the shared governance of the electricity Data Transfer Catalogue) within the MRA and BSC.
- 3.11 Ofgem have indicated that they expect the REC to host the gas and electricity data catalogues, with the potential to amalgamate these further into a dual fuel data catalogue, which will also include details of the new CSS messages currently being developed by DCC.
- 3.12 To facilitate this migration, ElectraLink is working with Xoserve to develop appropriate governance arrangements, including a defined change process, for the single gas catalogue, which can be migrated into the REC. The expectation is that details of 'Priority Provisions' which require assessment by REC, UNC and BSC parties will be developed by March 2019.

Data Enquiry Service

- 3.13 Provisions relating to the existing enquiry services (ECOES and DES) are included in the MRA, SPAA and UNC. These provisions cover the requirement to publish data, access arrangements and audit provisions for non-code parties accessing industry data.
- 3.14 Work is continuing with the development of a dual fuel Market Intelligence Service (MIS). However, it is not yet clear when this work will be completed and what impact it will have on the governance provisions required for the REC.
- 3.15 Therefore, ElectraLink is supporting development of a dual fuel REC Schedule which may be included in REC V2 or V3. The existing provisions (Schedule 23) will be removed from SPAA once these provisions migrate to the REC.

Priority Services Data

- 3.16 SPAA Schedule 42 'The Procedure for Sharing Priority Service Data' was introduced in June 2018. This Schedule defines the requirements for sending Priority Services Data including rules relating to informed consent and how to populate the relevant UK Link data flows. It is anticipated that these provisions will migrate into a dual fuel REC Schedule which details the requirements, with the data flows and associated guidance included in the data catalogue.
- 3.17 The transfer of personal customer data is also being considered via both SPAA CP 443 'Notification of Customer Contact Telephone Numbers to Large Transporters' and the Secure Communications Working Group (SCWG). The output from these CPs and the SCWG will also need to migrate to the REC and could be included within the wider 'Consumer Data' Schedule.
- 3.18 ElectraLink will monitor the progress of these activities and support the development of dual fuel REC Schedules where required.

4. Recommendation

- 4.1 The SPAA EC is invited to:
- NOTE the contents of the paper;
 - AGREE the approach to developing Switching SCR changes as set out in Section 2; and
 - AGREE to provide this paper to Ofgem as the SPAA impact assessment.

5. Appendices

- Appendix 1 – Table of Schedules

6. Attachments

- Attachment 1 – Summary of SCR Changes

Sarah Jones

Appendix 1 Tables of Schedules

Schedule	Title	Scope of the REC	Phase
Schedule 1	Parties	This is not directly impacted by the REC, though there would be a duplicate Schedule for this area.	N/A
Schedule 2	Accession Agreement	This is not directly impacted by the REC, though there would be a duplicate Schedule for this area.	N/A
Schedule 3	Self - Certification	This is not directly impacted by the REC, though there would be a duplicate Schedule for this area.	N/A
Schedule 4	SPAA Limited	This is not directly impacted by the REC, though there would be a duplicate Schedule for this area.	N/A
Schedule 5	-	Redundant Schedule.	N/A
Schedule 6	SPAA Products	<p>This includes a list of SPAA Products as follows:</p> <ul style="list-style-type: none"> • MAMCoP • AMICoP • RGMA Baseline • Supplier Data Flow Catalogue <p>This Schedule will not be migrated to the REC, however the products may be migrated as part of the enduring of future phases.</p>	N/A
Schedule 7	-	Redundant Schedule	N/A
Schedule 8	Process for Customer requested Objections	Provisions transferred to the REC	REC V2
Schedule 9	Process for the assignment of debt in relation to PPM	Provisions transferred to the REC	REC V2
Schedule 10	Procedure for Resolution of erroneous transfers	Provisions transferred to the REC	REC V2
Schedule 11	The Procedure for Agreement of change of Supplier Reading and the resolution of	Provisions transferred to the REC	REC V2

	disputed change of supplier readings.		
Schedule 12	-	Redundant Schedule	N/A
Schedule 13	-	Redundant Schedule	N/A
Schedule 14	-	Redundant Schedule.	N/A
Schedule 15	-	Redundant Schedule.	N/A
Schedule 16	-	Redundant Schedule.	N/A
Schedule 17	-	Redundant Schedule.	N/A
Schedule 18	Market Domain Data	Working Group established to amend provisions to reflect migration of the management of Market Participant data to the UNC	REC V2
Schedule 19	-	Redundant Schedule.	N/A
Schedule 20	NOSI	Provisions transferred to the REC	REC V2
Schedule 21	The Procedure for Supplier submission of and early reading (POS) or old supplier estimated reading (OSER)	Provisions transferred to the REC or UNC (TBC)	Pre REC
Schedule 22	SPAA Metering Schedules	Provisions transferred to the REC	REC V3
Schedule 23	Provision and Utilisation of DES and other supply point information services	Provisions transferred to the REC	TBC
Schedule 24	Publication of Operational and Escalation Contact Information	This is not directly impacted by the REC, though there would be a duplicate Schedule for this area.	N/A
Schedule 25	-	Redundant Schedule	N/A
Schedule 26	Breach & Event of Default Process	This is not directly impacted by the REC, though there would be a duplicate Schedule for this area.	N/A
Schedule 27	-	Redundant Schedule	N/A
Schedule 28	-	Redundant Schedule	N/A

Schedule 29	Technical Glossary	Definitions to be reviewed and migrated for REC V2 and REC V3	REC V2 REC V3
Schedule 30	The Procedure For Resolution Of Duplicate Meter Points (RDM) For The Same Gas Supply	Provisions transferred to the REC	REC V2
Schedule 31	Procedure for the resolution of Crossed Meters	Provisions transferred to the REC	REC V2
Schedule 32	Meter Asset Manager Arrangements	Further consideration for whether MAMCoP should form part of the REC.	REC V3
Schedule 33	Theft of Gas Code Practice	All theft provisions to be migrated to the REC in one go.	REC V3
Schedule 34	Theft Risk Assessment arrangements	All theft provisions to be migrated to the REC in one go.	REC V3
Schedule 35	Gas Smart Metering System Operator (SMO) Retrospective Update Process	Schedule to be removed before REC implementation	N/A
Schedule 36	Provision of Smart Meter Roll-out Data to Transporters	This is not directly impacted by the REC, though can be transferred across into enduring governance.	REC V3
Schedule 37	Energy Theft Tip-Off Service	All theft provisions to be migrated to the REC in one go	REC V3
Schedule 38	-	Redundant Schedule	N/A
Schedule 39	Gas Theft Detection Incentive Scheme	All theft provisions to be migrated to the REC in one go	REC V3
Schedule 40	Approved Meter Installer Arrangements	Further consideration for whether AMICoP should form part of the REC.	REC V3
Schedule 41	-	Redundant Schedule	N/A
Schedule 42	The Procedure for Sharing Priority Services Data	Provisions transferred to the REC	REC V3
Schedule 43	Smart and Legacy Prepayment Activities	Provisions transferred to the REC	REC V2