
REC

THE RETAIL ENERGY CODE COMPANY

Cross Code Steering Group Proposals

Presented to UNC Panel 15th April
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Objectives & Principles of the CCSG

Objectives of the CCSG (extract from Ofgem Draft Terms of Reference)

The purpose of the CCSG is to support the development of change proposals that impact multiple industry codes. The key objectives are to:

- Assess each change proposal to determine whether there are cross code impacts (which can be in the pre-assessment stages);
- Where cross code impacts are identified, determine which is the 'lead code';
- Determine which industry parties / service providers should be invited to provide an impact assessment and the approach to delivering this impact assessment; and
- Ensure the views of constituent code parties / service providers are represented as part of the change proposal's decision-making process.

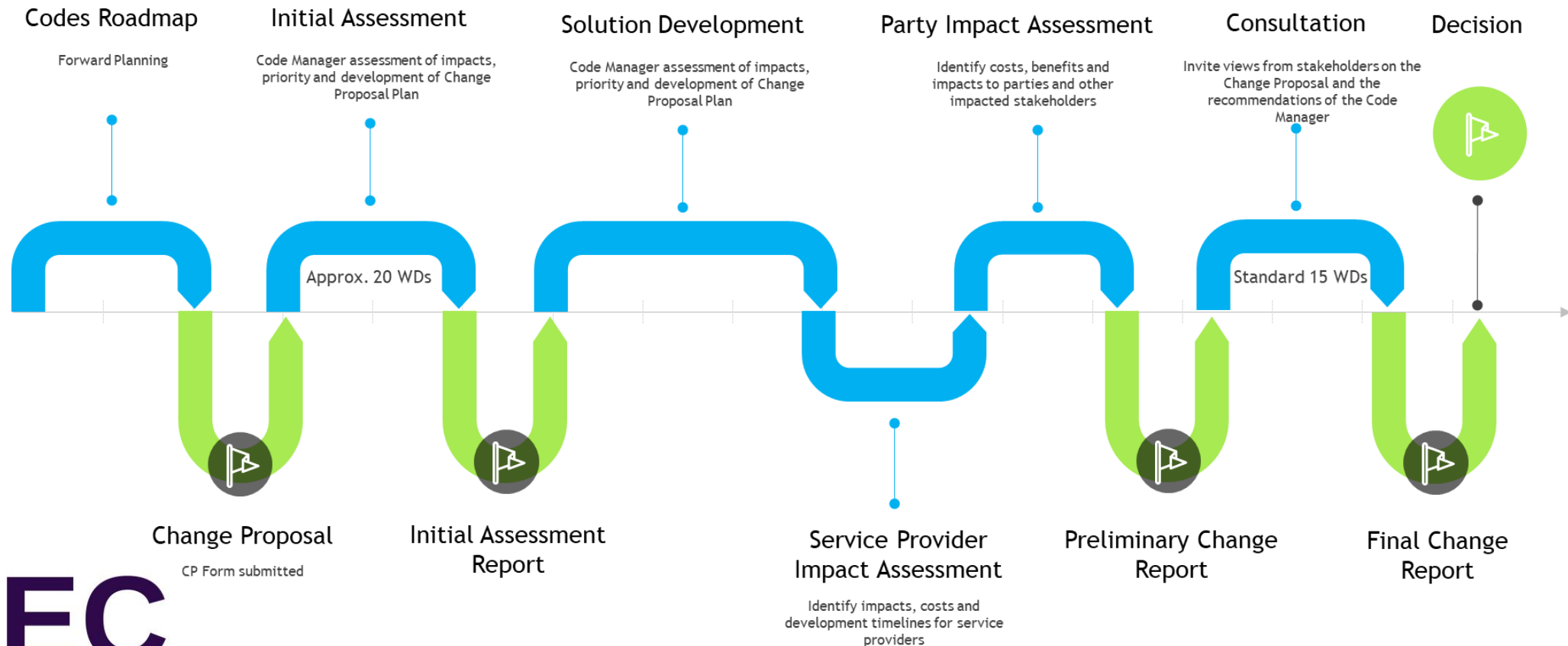
Principles of the CCSG ⁽¹⁾ (extract from Ofgem Consultation Dec 2020)

- 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.

REC Change Process and Cross Code Impacts

Change Process Overview

Category 1 and 2 changes will follow the formal process set out in the REC Change Management Schedule.



Cross Code Impacts by Lead Analyst

- The REC Lead Analyst will consider whether the Change Proposal might have an impact on any other energy industry codes.
- All REC Change Proposals will be referred to the CCSG by the Lead Analyst, for assessment. This will include the inclusion of their view on any cross code impacts, except where it is clear this is not relevant (for instance non-material housekeeping changes).
- The CCSG members will review the Change Proposal and provide a view on whether they believe their code is impacted within **5 working days**.
- Where this is the case, they will include their views as to which code body should act as the Lead Code.

What happens if the Change Proposal impacts another Code?

- Where a Change Proposal impacts both the REC and another code the CCSG will determine which code is most affected and which code should lead on the development of the Change Proposal.
- The Lead Code is responsible for leading the development of the proposal, the development plan and the impact assessment, and ensuring that the views of different code parties and service providers are represented in decision making process.
- The Lead Code will also be responsible for the eventual approval or rejection of the Change Proposals to their code and other codes, with other code body decisions acting as a recommendation to the Lead Code.
- Where the REC is the Lead Code in relation to a Change Proposal, the Change Proposal Plan will include the plan for identifying the impacts to other code parties and service providers as well as its own.
- Where another code is the Lead Code, the REC Code Manager will align the Change Proposal Plan with the timetable set by the Lead Code and co-ordinate any Impact Assessments or Consultations with that timetable.

Role of CCSG in all Code Changes

Role of CCSG in all Code Changes

- The purpose of the CCSG is to support the development of change proposals that impact multiple industry codes
- The CCSG will provide a robust mechanism (initially pursuant to the REC Change Management Schedule and then in accordance with the modification rules of all relevant codes) for assessing cross code changes, which will remove duplication for parties affected via multiple codes, whilst still ensuring that all impacted parties have the ability to engage in the change process.
- The CCSG shall consider any issues with cross code impact that are referred to it by the REC Code Manager or Code Administrator of any of the codes, or any provider of central systems governed directly or indirectly by those codes; such issues may include but will not be limited to:
 - Changes to the metadata for data items and / or messages defined in the REC Data Specification;
 - Changes to access arrangements set out in the REC Data Access Matrix;
 - Changes to the joint BSC / REC entry assessment provisions;

Determining the Lead Code and understanding their role

Role of the Lead Code (extract from Ofgem Consultation December 2020)

Where the CCSG 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).

Determining the Lead Code ⁽¹⁾

When determining which code should act as the Lead Code, the CCSG should consider several factors including:

- The scope of the issue and size of the impacts to each code and parties to that code, and whether the intention of the change is to wholly or mainly resolve issues governed by a particular code (e.g. wholesale / trading arrangements, distribution network connections, smart metering, retail market arrangements / consumer impacts).
- Changes to service providers procured and/or governed by relevant code bodies.
- Where changes impact data definition in the Data Specification, the relevant metadata owners for each market message/data item.
- The most appropriate and relevant approval body for the approval of the Change Proposals.

What's next?

- CCSG – Kick off meeting with Code Administrators facilitated by REC
 - Gas Codes: UNC/iGT UNC
 - Electricity codes: BSC/DCUSA
- Next meeting will look to explore ways of working
 - Working with example changes
 - Secretariat and Chair roles
- Ofgem have also discussed at RDUG and consideration of appeals processes have been taken away for development.