**Disclosure Request Report**

**Allowing the REC Performance Assurance Code Manager (RPA) access to data via the DPM**

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| **Prepared by:** | Jai Le Resche |
| **Submitted for:** | Approval |
| **Decision details:** | **CoMC is requested to approve this request to enable the release of data to the REC Performance Assurance (RPA) Code Manager.** Data will only be released following the approval of the UNC and IGT UNC Modifications to add the Retail Energy Code to the Data Permissions Matrix. |
| **Date:** | 7th June 2021 |

1. **Introduction and background**

The Retail Energy Code Company (RECCo) are responsible for ensuring the proper, effective, and efficient implementation and ongoing management of the Retail Energy Code (REC). In addition to other industry data sources the UK Link system will provide a logical and efficient source of data to support this objective.

UNC Modification 0762 and IGT UNC Modification 155 ‘Adding the Retail Energy Code Company as a new User type to the Data Permissions Matrix’ are seeking to amend the Data Permissions Matrix (DPM) to enable the release of data to the Retail Energy Code Company and also to parties appointed by RECCo to fulfil specific roles under the Retail Energy Code.

The Data Permissions Matrix Conditionality document will describe the use cases upon which data will be provided to RECCo, and parties performing any specific roles. This document describes the use case for the purpose of sharing data with the REC Performance Assurance Code Manager (RPA).

The REC Code Manager role is split into three roles – Professional Services; Performance Assurance (RPA) and Technical Assurance (RTA). If equivalent use cases are identified for other REC Code Managers, then a DRR will be raised and the use cases described in the DPM Conditionality Document.

The CDSP will have obligations to support the REC Performance Assurance Code Manager (RPA) – once these are established. We are still working with the RPA to fully define the data requirements but the RPA expect to have the data available and established reporting from 1st September 2021.

The RPA have requested access to Meter Point level data within the DPM, which will allow them to monitor performance of parties under the REC. A significant proportion of the performance data will be centrally recorded in the UK Link system – such as Meter Reading and Meter Asset data.

The proposed amendment to the Data Permission Matrix is therefore:

1. Add the RECCo as a new user in order to access data
2. Update the Conditionality document to detail the use case of data provided to the RPA

*\* Pending modification approvals – UNC Mod due to be approved on 17th June 2021, if approved, we will provide actual sample data from the implementation date (expected to be 12th July 2021). Until the IGT UNC Modification is approved, any sample data will exclude IGT sites. IGT Mod is expected to be approved on 23rd July 2021.*

1. **Data Items**

The RPA is responsible for assessing and reporting upon REC parties performance. This DRR is proposing to:

1. Provide performance summary data to RPA
2. Provide Meter Point level data to RPA in order for them to be able to carry out detailed analysis on performance of parties under the REC using relevant data
3. Provide an extract of Meter Asset data from UK Link on a [monthly] basis

The RPA have requested specific transactional data. At present, and as discussed with the CoMC, we are only proposing to provide Rejected Transactions. We are exploring the use case further with the RPA regarding the provision of Accepted Transactions data.

The table below outlines the proposed data items for RPA to access. The RPA will be able to access data for all Users.

|  |  |
| --- | --- |
| **DATA ITEM** | **Justification** |
| MPRN | Providing RPA with access to data within the DPM will allow them to monitor performance of parties under the REC. Because of the limited data within the CSS system a significant proportion of the performance data will be centrally recorded in the UK Link system |
| MAM |
| Current Supplier ID |
| Meter Serial Number |
| Meter Model |
| MAM Provided MAM ID (Short Code) |
| MAM Extract Date |
| MAM Provided Meter Serial Number |
| MAM Provided EFD |
| MAM Provided Manufacturer |
| MAM Provided Model ID |
| Supplier in UK Link matches MAM Extract Indicator |
| Processing date – UK Link |
| Transaction Receipt Date |
| Transaction Status |
| Transaction Processing Date |
| Transaction Rejection Count |
|  |
|  |
| Current Supplier Short Code |
| Supplier Effective Date |
| Response (Rejection) Code |
| Response (Rejection) Description |
| MAM Effective From Date |
| MAM ID (Short Code) |
| Status of Service Switch |
| Meter Point Reference Creation Date |
| Address |
| Address Effective Date |
| Postcode |
| Network Short Code |
| IGT Id (Short Code) |
| SMP Status |
| SMP Status Effective Date |
| Withdrawal End Date |
| Market Sector Code |
| LDZ ID |
| Latest Meter Read Date |
| Current Supplier |
| Meter Capacity |
| Meter Type |
| Meter Year of Manufacture |
| Meter Installation Date |

*NB - RPA have requested the MAM Portfolio data report, as envisaged under Mod0297. Although some of the data items included in that report are included within this DRR we are not currently anticipating providing the data in the Mod 0297 format. Discussions are yet to be concluded, and we will update the CoMC when we have done so.*

1. **Privacy Impact Assessment**

Where the disclosure of information includes the processing of personal data a Privacy Impact Assessment may be required.

Xoserve has considered the various tests that may be applied and has determined that a Privacy Impact Assessment is required.

The tests (and answers) applied in determining whether a Privacy Impact Assessment was required were:

a) Will the project involve the collection of new information about individuals?

**No**

b) Will the project compel individuals to provide information about themselves?

**No, no additional data will be collected about individuals.**

c) Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?

**Yes**, **whilst the RPA does not currently receive MPRN level data, they are required to access this to fulfil their obligations under the REC.**

d) Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?

**No.**

e) Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.

**No.**

f) Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?

**No, there is no impact to individuals as a result of implementing this change.**

g) Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private.

**No, the data being viewed via the DPM is not sensitive data.**

h) Will the project require you to contact individuals in ways that they may find intrusive?

**No, the data will be used by RPA to monitor performance of users under the REC, but there will be no need to contact individuals.**

i) Will the disclosure of information utilise new technology for Xoserve?

**No, the format of release of data to the RPA is to be confirmed, but it is expected to be a file transfer via the REC portal or SFTP.**

j) Will the disclosure include information that identifies a vulnerable customer?

**No.**

k) Will the disclosure release mass data to a party?

**Yes, part of this request will release Meter Point level data to the RPA.**

l) Will the disclosure include information that identifies an occurrence of theft of gas.

**No, the data is specific to performance monitoring.**

m) Will the disclosure require a fundamental change to Xoserve business

**No.**

1. **Commercial model**

The RECCo and Xoserve are currently negotiating a Framework Agreement (in accordance with the DSC Third Party and Additional Services Policy) for the purpose of providing various services. It is anticipated that the reporting to the RPA, as requested under this DRR, will be provided as a Work Order under this Framework.

1. **Method of access to the dataset**

The method of data transfer is to be confirmed. The RPA have indicated that their preference is for the data to be provided by the REC Portal, but the CDSP has yet to see the specification of this to confirm that this is appropriate. An alternative delivery method discussed is SFTP.

1. **CoMC determinations**

CoMC is requested to approve this Disclosure Request Report.

**Appendix 1: Current Data Permissions Matrix with proposed changes as per this Disclosure Request Report**

Please see attached the proposed changed to the Data Permissions Matrix as a result of approving this DRR. Changes/additions are marked up in red text.

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**Appendix 2: Current DPM – Conditionality Document with proposed changes as per this Disclosure Request Report**

Following approval of the DRRJUN21-01, the Data Permissions Matrix – Conditionality Document has been amended to include the RPA use case in line with the DRR, and to reflect the CoMC point that highlighted that the RECCo themselves are entitled to access any data approved to be released to individual Code Managers.

This will be submitted for formal approval at the July 2021 DSC Contract Managers Meeting.

