RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	**Final Recommendation**

CHANGE REPORT

R0272 – ENABLING TRANSPARENCY OF THE CRS PROVIDER'S REC SERVICE LEVEL PERFORMANCE

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	27 February 2026
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	PERFORMANCE ASSURANCE BOARD	**CHANGE PATH**	SELF-GOVERNANCE
PRIORITY STATUS	LOW	**URGENCY**	STANDARD
IMPACTED STAKEHOLDERS	Centralised Registration Service (CRS) Provider, Data Communications Company (DCC)		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	ASSURANCE LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

This Change Proposal seeks to formalise RECCo's permission to publish details about the Centralised Registration Service (CRS) Provider's performance in aggregated or individual form.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the Performance Assurance Board:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 27 February 2026.

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BACKGROUND

1 SUMMARY

RECCo regularly reports on the performance of REC Service Providers in relation to their activities under the REC. However, there is currently no formal agreement to permit the publication of CRS performance measures between the CRS Provider and RECCo.

Due to the multi-Party agreement, the REC does not specifically address the publication of this performance data. Instead, RECCo are operating under an informal understanding with the CRS Provider, resulting in a possibility that publication may be delayed or not agreed to in a given month. RECCo is dependent on the CRS Provider's approval for each publication, which can cause delays. This approval could also be withheld at any point.

The CRS Provider has been submitting performance reporting data to the Code Manager on a monthly basis. This Change Proposal does not seek to alter that process or request additional information; it solely aims to formalise the permission to publish this data, whether in aggregated or individual form.

The Code Manager sought legal advice on this Change Proposal. The advice indicated that implementing a Change Proposal would likely improve engagement and provide clarity on the proposals, leading to a more effective process and reducing potential legal risks. It was also advised that the REC Schedule 6 - Performance Assurance be amended to include a new paragraph confirming that the REC Performance Assurance Board (PAB) may produce reports outlining how Parties or Non-Party REC Service Users have performed against applicable Code requirements.

2 PROBLEM STATEMENT

Unlike REC Service Providers, there is currently no formal agreement in place between the CRS Provider and RECCo to publish details about the CRS Provider's performance. RECCo is therefore dependent on the CRS Provider's approval for each publication. Not only could there be delays in RECCo's reporting, but the approval could also be withheld at any point, preventing RECCo's reporting.

3 IMPACTS

CONSUMERS
All Consumers

REC SERVICE PROVIDERS
DCC

RECCO / REC CODE MANAGER
RECCo
REC Performance Assurance

REC PARTIES AND SERVICE USERS
CRS Provider

REC DOCUMENTS / PRODUCTS
Schedule 6 – Performance Assurance

MHHS
There is no impact on MHHS.

4 CROSS-CODE IMPACTS

There are no cross-code impacts associated with this Change Proposal.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**01 Oct-25**	**30 Nov-25**
	Solution Analysis	Completed	Completed
	Legal Drafting and Review	Completed	Completed
Change Proposal		**01 Dec-25**	**26 Jan-26**
	Consultation	Completed	Completed
	Final Recommendation	January	January
Voting		**27 Jan-26**	**27 Jan-26**
	Appeal Window	28 January	11 February

This Proposal Plan did not include a Party Impact Assessment because there are no impact or operational changes required by REC Parties. REC Parties have engaged and submitted views as part of the industry consultation that was issued between December 2025 and January 2026.

6 STAKEHOLDER ENGAGEMENT

The Code Manager has engaged with PAB to gather feedback on the proposed solution.

Throughout the progression of this change, the Code Manager has engaged with:

- RECCo to monitor the direction of the solution and ensure there were no Performance Assurance nor technical costs nor impacts; and
- REC Performance Assurance (RPA) to monitor the direction of the solution. The solution does not involve a publication on the public REC Performance dashboards, but for RECCo to publish an aggregate or any of the monthly verified Service Level performance metrics on RECCo-owned websites. No cost to Parties was therefore foreseen and RPA was kept informed during the development of this solution.

7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	0	27	0
	Retail Markets Impact	Innovation and Market Arrangements	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	1	14	14
Resource	Complexity / Effort / Duration		3	9	28
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		1		8
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	1	10	10
				Overall Priority Score (rounded)	98

Priority Status	LOW
Change Proposal Type	STANDARD

This change was assigned a priority status of 'Low' due to its priority scoring of 98.

SOLUTION

8 PROPOSED SOLUTION

The solution proposed is to amend the legal text of REC Schedule 6 – Performance Assurance to allow the REC PAB to delegate to RECCo the action, and the decision should the REC PAB wish to do so, to publish an aggregate or any of the monthly verified Service Level performance metrics currently provided by the CRS Provider to the Code Manager.

REC Schedule 6 will be updated so that Annex A refers to "Performance Levels" as well as "Performance Charges" which would better reflect the current content of Annex A. Within this amended annex, a new paragraph will be added to include the provision of the process which applies to CRS Provider's performance regime. R0272 only intends to enable transparent reporting and will therefore not have an impact on the REC performance dashboards, nor will it have any technical impacts.

Whilst permission will not need to be sought for each publication, RECCo will continue to work with the CRS Provider to ensure an accurate reflection of performance is achieved.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0272 can be found here.

PRELIMINARY ASSESSMENT

10 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

No risks, assumptions, issues and dependencies have been identified by the Code Manager as part of this Change Proposal.

11 BUSINESS CASE ASSESSMENT

11.1 COSTS

There are no costs associated with the implementation of this Change Proposal.

11.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
IMPROVE TRANSPARENCY SURROUNDING THE MONTHLY REPORTING	The implementation of this Change Proposal should provide transparency of the reporting of the CRS Provider's REC Service Level performance. Currently the Code does not specifically address the publication of this performance data. Instead, an informal understanding is in place with the CRS Provider. This Change Proposal will formalise RECCo's permission to publish details about the CRS Provider's performance in aggregated or individual form.
IMPROVE ACCURACY AND TIMELY REPORTING	The implementation of this Change Proposal will establish a framework for accurate and timely monthly reporting. Currently, reporting cannot be guaranteed due to the absence of an agreement between the CRS Provider and RECCo to publish CRS performance measures. This lack of agreement creates a risk of delays or non-publication in any given month. By implementing this Change Proposal, a structured approach that supports consistent and reliable reporting will be ensured.
IMPROVE CLARITY WITHOUT ADDING ANY ADDITIONAL CAPACITY REQUIREMENTS TO THE PROCESS	The implementation of this Change Proposal should increase engagement and provide clarity leading to a more effective process and reduction in potential legal risks. Furthermore, it does not seek to alter that process or request additional information as it solely aims to formalise the permission to publish this data.

11.3 COST BENEFIT ANALYSIS

There are no central system costs, no expected costs to Parties and three intangible benefits associated with this Change Proposal. As such, the Code Manager believes that there is a positive case for change.

12 CASE FOR CHANGE

The Code Manager considers there is a positive case for change for implementing this Change Proposal on the basis that the proposed solution:

- Is both viable and implementable, and effectively resolves the problem statement;
- has no associated central system costs and no associated Party costs;

- has proportionate effort required for implementation;
- should improve transparency surrounding the monthly reporting of the CRS Provider's REC Service Level performance;
- should improve accuracy and timely reporting of the CRS Provider's REC Service Level performance; and
- should improve clarity without adding any additional capacity requirements to the current reporting process.

13 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 05 December 2025 to obtain views on the Change Report (For Consultation). In total, four non-confidential responses were received from two Distribution Network Operators and two Energy Suppliers. The key themes from these responses have been summarised and set out below. The non-confidential responses have been published on the REC Portal, here.

13.1 SUMMARY OF RESPONSES

All respondents were supportive of this Change Proposal being implemented.

13.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

All respondents agreed with the proposal solution and provided no comments on the proposed changes to the legal text of REC Schedule 6 – Performance Assurance.

13.3 BENEFITS RELATIVE TO IMPLEMENTATION AND OPERATIONAL COSTS

All respondents agreed with the Code Manager's assessment of the costs and benefits of this change.

13.4 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

All respondents agreed with the Code Manager's recommendation that this Change Proposal be approved.

All respondents agreed with the Code Manager's assessment that this Change Proposal should be subject to Self-Governance approval by the REC PAB.

13.5 IMPLEMENTATION DATE AND APPROACH

All respondents agreed with the Code Manager's recommendation that this Change Proposal be subject to a Big Bang implementation and with the proposed implementation date of 27 February 2026.

14 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No amendments have been made following consultation.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED CONSULTATION RESPONSES	Link

16 GLOSSARY

TERM	DEFINITION
Central Switching Service (CSS)	means the Systems and processes provided or procured by the CSS Provider for the purpose of providing the Address Management Service and the Registration Service.
Central Switching Service Schedule (CSS Schedule)	means REC Schedule 25.
Centralised Registration Service (CRS)	means the services provided pursuant to Condition 15 (Incorporation, delivery and provision of the Centralised Registration Service) of the DCC Licence, being the services provided under this Code by the CSS Provider, Switching Operator, CSS Certificate Authority and, until the end of the Post Implementation Period only, the Core Systems Assurance Provider and the CSS Systems Integrator.
CRS Provider	means the DCC when performing the functions and services required by Condition 15 (Incorporation, delivery and provision of the Centralised Registration Service) of the DCC Licence.
Data Communications Company (DCC)	means the person holding the DCC Licence.
Non-Party REC Service User	means, for a REC Service, an entity which is not a Party under this Code, but which has become a REC Service User for that REC Service.

TERM	DEFINITION
Party	means, from time to time, an Original Party or a New Party that has not at that time ceased to be a Party in accordance with Clause 17 of the main body of this Code.
Performance Assurance Schedule	means REC Schedule 6.
REC Performance Assurance Board (REC PAB)	means the performance assurance board for this Code, as from time to time established under Clause 15 of the main body of this Code (which is a Sub-Committee).
REC Service Provider	means the provider of each REC Service.
REC Service User	means in respect of each REC Service, either: (a) a Party which has become Qualified for that REC Service under the Qualification and Maintenance Schedule; or (b) an organisation which is not a Party, that has entered into an Access Agreement permitting it to use that REC Service and that has become Qualified for that REC Service under the Qualification and Maintenance Schedule.