RETAIL ENERGY CODE

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

CHANGE REPORT

R0269 SCHEDULE 5 – CHANGE MANAGEMENT: CLARITY AND TYPOGRAPHICAL REVIEW

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	07 NOVEMBER 2025
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	CHANGE PANEL	**CHANGE PATH**	SELF-GOVERNANCE
PRIORITY STATUS	MEDIUM	**URGENCY**	STANDARD
IMPACTED STAKEHOLDERS	ALL REC PARTIES		

LEAD ANALYST (SOLUTION LEAD)
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OVERVIEW

Following the implementation of R0167 and the introduction of the REC Issues process, the Code Manager has identified several opportunities to enhance clarity and correct typographical errors within Schedule 5 – Change Management, specifically in relation to the Issue and Change Proposal processes.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the REC Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 07 November 2025.

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BACKGROUND

1 SUMMARY

Following the implementation of R0167 and the introduction of the REC Issues process, the Code Manager has identified several inaccuracies and areas of ambiguity within Schedule 5 – Change Management. These issues have led to confusion for both the Code Manager and REC Parties, and in some cases, have resulted in procedural inefficiencies and unnecessary burdens on Sub-Committees. This Change Proposal seeks to correct those inaccuracies, improve clarity, and streamline the associated processes without altering the fundamental structure of the existing Change Management framework and Schedule.

Key updates include clearer distinctions between Issues, Change Proposals, and Alternatives; the introduction of a Resolved Issues procedure; and a requirement that Change Proposals must include a developed solution. The proposal also outlines steps for the Code Manager to notify the Change Panel when a submission is not accepted and clarifies the purpose and content of each type of Change Report (Proposal Plan, Impact Assessment, For Consultation, and Final Recommendation). Additional improvements include authorising responsible Sub-Committees to ratify updates to Proposal Plans, defining Service Provider Impact Assessment timetables, and providing guidance on reissuing Change Proposals and documenting post-consultation changes.

To support these changes, new and updated definitions will be introduced in Schedule 1 – Interpretations and Definitions, including terms such as Alternative Issue, Category 3 Change Proposal, and the various Change Report stages. Overall, this Change Proposal aims to ensure that Schedule 5 accurately reflects current practices and provides sufficient clarity and guidance for all REC stakeholders.

2 PROBLEM STATEMENT

The Code Manager has identified several inaccuracies and areas of ambiguity within Schedule 5 – Change Management. These issues have led to confusion for both the Code Manager and REC Parties, and in some cases, have resulted in procedural inefficiencies and unnecessary burdens on Sub-Committees.

3 IMPACTS

REC PARTIES AND SERVICE USERS
All REC Parties

REC DOCUMENTS / PRODUCTS
Schedule 5 – Change Management
Schedule 1 – Interpretations and Definitions

RECCO/ REC CODE MANAGER
Responsible Committees

MHHS
There are no impacts to MHHS from this Change Proposal.

4 CROSS-CODE IMPACTS

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

5 PROPOSAL PLAN

Milestone	Activity	From	To
Change Proposal		**27 Jul 25**	**20 Oct 25**
	Code Manager Initial Assessment	July	August
	Business Case Assessment	August	August
	Consultation	September	September
	Final Determination	September	October
Voting		**21 Oct 25**	**21 Oct 25**
	Appeal Window	22 October 25	05 November 25

6 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	2	14	28
Resource	Complexity / Effort / Duration		3	9	28
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	0	10	0
				Overall Priority Score (rounded)	86

Priority Status	LOW
Change Proposal Type	STANDARD

This Change Proposal has been given a priority status of low based upon a weighted prioritisation score of 86.

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SOLUTION

7 PROPOSED SOLUTION

The proposed solution includes the following:

- Further distinction and clarity between Issue and Change Proposal (and Alternatives);
- Clarity for the resolved Issues procedure;
- Clarity on how a submission will only be accepted as a Change Proposal if it includes a fully developed solution;
- The steps for the Code Manager to notify Change Panel if a submission is not accepted;
- Clear distinction on meaning of each Change Report stage between Proposal Plan, Impact Assessment, For Consultation and Final Recommendation;
- Provision for Responsible Sub Committees to have the ability to ratify updates to Proposal Plans (Paragraph 10.4 – new);
- Clarity on Service Provider impact assessment timetables;
- Clarity on how the Code Manager may decide to reissue a Change Proposal for consultation, and how any changes post consultation will be documented in the Change Report (Final Recommendation); and
- Typographical and terminology corrections.

8 DRAFT LEGAL TEXT

The legal text changes for Schedule 5 – Change Management to deliver the proposed solution to R0269 can be found here.

The legal text changes for Schedule 1 – Interpretations and Definitions to deliver the proposed solution to R0269 can be found here.

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PRELIMINARY ASSESSMENT

9 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

9.1 SERVICE PROVIDER IMPACT ASSESSMENTS

No Service Provider impact assessment was required as part of this Change Proposal.

9.2 REC PARTY IMPACT ASSESSMENTS

No Party Impact Assessment was undertaken for this Change Proposal, as the Code Manager has determined it is not necessary. The proposal does not introduce any changes to Party obligations and primarily serves to clarify existing processes. The most significant impacts are internal to the Code Manager's operations.

10 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

No risks, assumptions, issues or dependencies have been identified by the Code Manager.

11 BUSINESS CASE ASSESSMENT

11.1 COSTS

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

11.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
ENHANCED DECISION MAKING, GOVERNANCE AND ACCOUNTABILITY	Providing Sub-Committees with the authority to ratify Proposal Plan updates, along with requiring the Code Manager to notify the Change Panel when a submission is not accepted, introduces greater transparency and accountability into the Change process. These actions will help ensure an approach built on trust and fairness in the governance process and increases the speed of the decision-making process. Additionally, clearly defined Change Report stages and improved documentation, such as the Proposal Plan, Impact Assessment, and Final Recommendation, enable the Change Panel and Sub-Committees to make more informed and timely decisions. This contributes to more consistent and justified outcomes throughout the Change Management process.
IMPROVED CONSISTENCY WITH	Updating terminology and definitions ensures that the documentation accurately reflects current operational practices. This

CURRENT OPERATIONAL PRACTICES	reduces the effort required by stakeholders to interpret inconsistent terminology, making the process easier to follow and more accessible and engaging for all stakeholders.
IMPROVED STAKEHOLDER ENGAGEMENT	By simplifying the process and reducing procedural uncertainty, stakeholders are more likely to engage and submit more detailed, and higher quality, Change Proposals or Issues. A clearer and more transparent Change process also encourages wider participation, particularly from smaller or newer REC Parties who may have previously found the process difficult to follow, understand and engage with.
INCREASED CLARITY AND CONFIDENCE	The updated definitions and distinctions, such as those between Issues, Change Proposals, and Alternatives, will help reduce ambiguity within the Change Management process. This improved clarity enables stakeholders to better understand their roles and responsibilities, as well as the Code Manager's. As a result, REC Parties, Sub-Committees, and the Code Manager can engage with the Change process with increased clarity and confidence.

11.3 COST BENEFIT ANALYSIS

Since the solution for this Change Proposal is a legal text change only, and as there are no costs associated with the implementation of this change, the cost benefit analysis relies on the intangible benefits that this change facilitates.

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 directly resolves the problem statement by addressing the identified ambiguities and inefficiencies in Schedule 5 through clarifying processes and definitions;
- The changes are procedural, and documentation based only, requiring zero costs and minimal effort whilst offering significant change process improvements, making them proportionate and cost-effective;
- Not implementing the Change Proposal could continue to cause possible confusion and inefficiencies, while implementation supports enhanced governance, assists with greater quality of submissions, and reduces indirect risks to Market Participants and Consumers;
- While not directly Consumer impacting, the proposal enhances the efficiency and reliability of the change process, providing greater quality of submissions and stakeholder engagement, which in turn will support stronger outcomes for Consumers; and

the Change Proposal has a strong business case, as detailed in sections 11 and 12 of this Change Report, delivering meaningful process improvements at no cost and with clear benefits for REC Parties and stakeholders.

13 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 05 September 2025 to obtain views on the Change Report (For Consultation). In total one response was received a Distribution Network Operator. The key themes from this response have been summarised and set out below. The non-confidential responses have been published here.

13.1 SUMMARY OF RESPONSES

The respondent was mostly supportive of the proposed solution, with some additions. This is expanded on in section 13.2

13.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

The respondent commented that the paragraph 19.3 "*Any changes made after consultation shall be documented in the Change Report (Final Recommendation). The Code Manager may decide to re-issue the Change Proposal for consultation if it is felt the changes suggested ats consultation are significant enough to warrant this"* should use must rather than shall.

Legal advice received previously on other Change Proposals has indicated "shall" is the preferred wording as it allows for situations where other steps may be taken to fulfil the same obligations.

If the Code Manager did not confirm any changes made in the Change Report (Final Recommendation), it would need to prove to any auditors that steps taken still fulfilled this obligation. An example of this could be REC Change R0152, which confirmed that many changes were made following consultation but did not provide a list of those changes within the report as it was too lengthy. It did however signpost to where all of those changes could be found.

The respondent queried if it was the Code Manager's decision on whether a Change Proposal warrants a second consultation, and whether this should involve the Responsible Sub-Committee or an appeal process for Parties.

While this decision is mostly within the gift of the Code Manager, if the Responsible Sub-Committee felt they did not have all the information they needed to make a decision without a second consultation, they could direct the Code Manager to do so.

The introduction of an appeals process for Parties to vote on whether a second consultation is required would be a brand-new process, and not one that is within the scope of R0269. The Code Manager has encouraged the respondent to raise a new submission if this is something they would like to be considered under a different Change Proposal.

Lastly, the respondent questioned the criteria that the decision of whether or not there will be a second consultation be based on. The Code Manager does not think it is appropriate to codify

this as it will be different for every Change Proposal. However, if the changes made post consultation as so significant that they fundamentally change the proposed solution, this would be subject to a second consultation so that Parties have had the chance to comment on the solution going to the Responsible Sub-Committee for voting.

13.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

The respondent agreed with the Code Manager's assessment of the costs and benefits for this Change Proposal. They also agreed with the Code Manager's recommendation this Change Proposal be approved.

13.4 IMPLEMENTATION DATE AND APPROACH

The respondent agreed with the Code Manager's recommendation that this Change Proposal be implemented on 07 November 2025.

14 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No amendments were made following consultation.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Schedule 5 – Change Management (for consultation – 21.08.2025) Schedule 1 – Interpretations and Definitions (for consultation – 21.08.2025)
CONSOLIDATED CONSULTATION RESPONSES	Link

16 GLOSSARY

TERM	DEFINITION
Change Proposal	means a proposal to change this Code made in accordance with Clause 11 of the main body of this Code or the Change Management Schedule.
Change Report	means the written report on a Change Proposal prepared by the Code Manager in accordance with the Change Management Schedule.
Code Manager	means the person described in Clause 7 of the main body of this Code.
Issue	means an issue affecting this Code that may become a Change Proposal in accordance with the Change Management Schedule.
Responsible Sub-Committee	is described in Paragraph 2.2 of the Change Management Schedule
Sub-Committee	means a sub-committee of the REC Board established from time to time in accordance with Clause 5 of the main body of this Code.