RETAIL ENERGY CODE

By email - industrycodes@ofgem.gov.uk

Dear Industry Codes Team,

SECOND CONSULTATION ON THE IMPLEMENTATION OF THE ENERGY CODE REFORM

This response has been provided by members of the Cross Code Steering Group (CCSG). The CCSG welcomes the opportunity to respond to Ofgem's consultation on the implementation of Energy Code Reform.

Commented [LM1]: Discuss use of REC branding

Commented [LM2R1]: REC because the ToR are held under the REC.

CCSG has continued to evolve since its inception in 2021. In 2024 the CCSG moved from a monthly meeting to twice monthly to keep up with the pace on changes across the codes. Additionally, the Group has expanded to allow the inclusion of the Market-wide Half Hourly Settlement (MHHS) Data Integration Platform manager and the Data Transfer Service Agreement administrator. The CCSG has already discussed how best to update the Group's Terms of Reference (ToR) to incorporate all existing and future consolidated codes. The drafting discussed and agreed by the CCSG is as follows:

2.2 The CCSG shall consider issues and change proposals with cross code impacts from any industry code, including but not limited to the:

- Retail Energy Code (REC);
- Balancing and Settlement Code (BSC);
- Distribution Connection and Use of System Agreement (DCUSA);
- Uniform Network Code (UNC);
- Independent Gas Transporters Uniform Network Code (IGT UNC);
- Smart Energy Code (SEC); and
- Data Integration Platform (DIP) Rules.

This amendment would be raised via the REC's Change Process and implemented in 2025. It could then be updated once code consolidation has been completed as this would avoid the need for multiple changes.

The CCSG notes and agrees with the removal of the Code Administrators Code of Practice (CACoP) Forum and would be happy to discuss any additional obligations that Ofgem see being transferred to the CCSG ToR.

The CCSG recognises that there is potential for a two-tier CCSG to be set up. This could be a strategic level with the current CCSG remaining as a operational / technical level change group. This would allow the focus to remain on changes with the individual teams directly responsible for change. The CCSG is happy to discuss this further with Ofgem.

The CCSG recognises that the key requirement to successful cross code working is consistent, active participation by all codes. This requires all codes to provide an appropriately informed represented at all meetings. Further, discussed were originally envisioned as only selecting the lead code at the start of each change's journey. However, experience shows that as solutions develop, there needs to be regular checks on individual changes to make sure that all impacted codes are progressing linked changes as effectively as possible in line with the lead code. This also allows all impacted codes to flag one working group rather than holding individual working groups or expert group discussions.

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The CCSG would be pleased to discuss further the current and proposed processes with Ofgem, to widen understanding, ensuring a good outcome for code parties and an efficient and effective solution for consumers.

For further information or discussion please contact Lorna Mallon, CCSG Chair (lorna.mallon@recmanager.co.uk).

Yours sincerely

Lorna Mallon
CCSG Chair