RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

01	Proposal Plan
02	Impact Assessment
03	Consultation
04	Final Recommendation

CHANGE REPORT

I0248 REC CHANGES TO TIE IN WITH DCP451 - SUSPENDING REGISTRATIONS

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	TBD
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Change Panel	CHANGE PATH	Self-Governance
PRIORITY STATUS	Medium	URGENCY	Standard
IMPACTED STAKEHOLDERS	DNOS, Energy Suppliers		

LEAD ANALYST (SOLUTION LEAD)	ASSURANCE LEAD	SUBJECT MATTER EXPERT
CAROLINE FREIMULLER	VAISHNAVI SHARMA	LORNA MALLON
Click to send an email	Click to send an email	Click to send an email

OVERVIEW

DCUSA Change DCP451 Suspending Registrations and this cross-code REC Change have been raised to provide clarity on the process for when a DNO ends a Regulatory Alliance with an Energy Supplier. The solution must consider a cross-code solution, which does not put Consumer outcomes at risk.

RETAIL ENERGY CODE

CONTENTS

1 Summary 3
2 Problem Statement 3
3 Impacts 3
4 Cross-Code Impacts 4
5 Proposal plan 4
6 Stakeholder Engagement 4
7 Priority Status and Urgency 5
8 Proposed Solution 6
9 Draft Legal Text 6
10 Appendix 7
11 Glossary 7

BACKGROUND

1 SUMMARY

A change was raised by a Distribution Network Operator (DNO) to the Distribution Connection and Use of System Agreement (DCUSA), to provide clarity on the process for when a DNO ends a Regulatory Alliance with an Energy Supplier. This DCUSA change is DCP451 Suspending Registrations.

A REC Change was subsequently raised following discussions at the Cross Code Steering Group (CCSG) as many of the processes for breaking a Regulatory Alliance are held in REC Schedule 24 Switching Data Management.

2 PROBLEM STATEMENT

A lack of clarity on the process for when a DNO ends a Regulatory Alliance with an Energy Supplier can cause confusion with the Energy industry, and lead to poor Consumer outcomes if the correct process is not followed.

3 IMPACTS

CONSUMERS
Indirect

RECCO / REC CODE MANAGER
REC Performance Assurance Board (PAB)

RECCO / REC CODE MANAGER
Schedule 24 Switching Data Management

REC PARTIES AND SERVICE USERS
DNOs
Energy Suppliers
Central Switching Service (CSS)

MHHS DESIGN
No impact

MHHS DATA SPECIFICATION
No impact

MHHS CODE DRAFTING
Indirect impact

Amendments are being made to Schedule 24 Switching Data Management by the MHHS programme. While drafting the legal text for this Change Proposal, the Code Manager has cross-referenced with the MHHS baseline of Schedule 24 Switching Data Management to ensure there are no discrepancies in the drafting.

4 CROSS-CODE IMPACTS

This is a cross-code change to DCUSA Change DCP451 Suspending Registrations. DCUSA are the lead code for these changes.

DCP451 was discussed at DCUSA Panel 227 on 21 May 2025, where it was agreed it would be voted on ex-committee for a June implementation. While I0248 is linked to DCP451, there is no requirement for the changes to go live simultaneously.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**06 Mar 25**	**19 Jun 25**
	Code Manager Initial Assessment	March	March
	Solution Development	April	May
	Legal Review	May	June
	Business Case Assessment	June	June
Change Proposal		**20 Jun 25**	**18 Aug 25**
	Consultation	June	July
	Solution Refinement	July	August
	Final Determination	August	August
Voting		**19 Aug 25**	**19 Aug 25**
	Appeal Window	20 Aug 25	04 Sep 25

This change has been previously consulted on under DCUSA and the legal text changes are to provide clarity to process, but to make no changes to obligations. On this basis, the Code Manager is proposing this Change Proposal does not have a Party impact assessment and proceeds straight to consultation.

6 STAKEHOLDER ENGAGEMENT

There have been two Working Group meetings held by DCUSA for these changes, on 05 March 2025 and 02 May 2025. The REC Code Manager was present at both meetings.

This change was consulted on by DCUSA from 17 March to 07 April 2025, available here. Only the DCUSA legal text was consulted on, and the REC legal text created after the DCUSA legal text was finalised.

RETAIL ENERGY CODE

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	1	27	27
	Retail Markets Impact	Innovation and Market Arrangements	2	17	33
	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		2	9	18
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)*		Cross Code Activity	2	10	20
				Overall Priority Score (rounded)	140

Priority Status	MEDIUM
Change Proposal Type	STANDARD

RETAIL ENERGY CODE

SOLUTION

8 PROPOSED SOLUTION

This Change Proposal makes changes to Schedule 24 Switching Data Management. These changes are:

- An addition to section 4.5 (k), clarifying each DNO can each its Regulatory Alliance with the Energy Supplier, the scenarios in which DNOs can do this are covered by DCUSA and that the alliance must be re-established once the breach is remedied;
- A clarification that the Market Participant Role Alliance required to be sent to the CSS is a Market Message (specifically MM90003);
- Clarity that sections 4.10.5 and 4.10.6 are applicable when creating a Regulatory Alliance when an Electricity Supplier accedes to the DCUSA;
- New section 4.10.7A that specifies the DNO must notify the REC PAB when ending a Regulatory Alliance (this was previously held in the DCUSA, and has been removed from the DCUSA and added to the REC following legal advice to both Codes);
- Addition of 1 Working Day SLA to sections 4.10.8 and 4.11.8, requiring CSS to update Regulatory Alliance data or Registration Permission data within this time frame;
- New sections 4.10.9 to 4.10.11, creating a distinction on how Regulatory Alliances are re-established versus creating a Regulatory Alliance when an Electricity Supplier accedes to the DCUSA; and
- In section 4.11.6, where a Market Sanction is applied or removed from an Electricity Supplier under the Balancing and Settlement Code (BSC) or DCUSA, BSCCo or DCUSA to copy REC PAB into communications with the REC Code Manager. Again, this was previously held in the DCUSA, and has been removed from the DCUSA and added to the REC following legal advice to both Codes.

The Code Manager has confirmed with the CSS Provider that the addition of this 1 Working Day SLA has no to minimal impact to them, as they use event driven architecture and should process the Market Messages faster than this.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to I0248 can be found here.

10 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
RELATED CHANGE(S)	DCUSA Change DCP451
ANY OTHER DOCUMENTS / LINKS	DCUSA consultation responses

11 GLOSSARY

TERM	DEFINITION
Balancing and Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
Balancing and Settlement Code Company (BSCCo)	means the company defined as such in the Balancing and Settlement Code.
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.
CSS Provider	means the DCC when performing functions under or in relation to this Code (but always excluding its functions under the Smart Energy Code and its roles as CSS Systems Integrator, SI Provider and Switching Operator), including in respect of the Central Switching Service and including in effecting the design, build and testing of any System that will allow it to perform functions under this Code after the CSS Go-Live Date. This role is the CSS Procurer and Manager function as described in the E2E Data Migration Plan, E2E Integration Plan, E2E Post Implementation Plan, E2E Testing Plan, E2E Transition Plan: Implementation Approach and E2E Transition Plan: In-Flight Switches Approach.
Distribution Connection and Use of System Agreement (DCUSA)	means the agreement of that name maintained pursuant to the Electricity Distribution Licences.
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.

Electricity Supplier	means a person holding an Electricity Supply Licence.
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
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).
Regulatory Alliance	means that the necessary regulatory relationships exists between Market Participants, as defined in the Switching Data Management Schedule.