RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0316 - CLARIFICATION OF DATA ITEMS WITHIN THE PAYMENT METHOD LEVELISATION SUPPLIER DATA REPORTING SPECIFICATION

On 04 March 2026, the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0316 – Clarification of Data items within the Payment Method Levelisation Supplier Data Reporting Specification.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

DOCUMENT VERSION	V1.0
RESPONSE TYPE	Non-Confidential
DATE ISSUED	26/03/2026
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Bela Ashworth

DATE CONSULTATION ISSUED	04/03/2026
RESPONSE DEADLINE	25/03/2026

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	We agree that the solution being implemented for this issue will reduce ambiguity in the levelisation reporting requirements.	Thank you for your response.
ScottishPower (Energy Supplier)	Yes, we agree with the proposed solution. However, we note that the consultation states there will be no retrospective recalculation required and that the overall impact on the scheme has been assessed as minimal. Could you please provide further details on how this "minimal impact" assessment was carried out. Additionally, given that some suppliers may have submitted an incorrect number of metering points and therefore received payments based on inaccurate figures, we request clarification from the Code Manager on whether any reconciliations will be undertaken, particularly in cases where this may have resulted in suppliers receiving higher payments than they were entitled to.	This assessment was undertaken collaboratively by RECCo and the Code Manager during the initial review of this Change Proposal. While the proposal does introduce impacts for REC Parties, the increased clarity within the solution ensures that the process and schedule align with the original intent of the reporting requirements, thereby keeping any impacts to a minimum. Ofgem has clarified that R0316 is only intended to apply on a forward-looking basis where no retrospective resubmissions would be required. Undertaking a retrospective recalculation would require significant operational effort from Energy Suppliers, RECCo and other relevant Parties. Given that the impact on the scheme to date has been assessed as minimal, it is not considered proportionate to require the re-collection or recalculation of historic portfolio data.

Question 2:	Do you agree with the proposed implementation approach (BIG BANG)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	We agree that the solution being implemented for this issue will reduce ambiguity in the levelisation reporting requirements.	Thank you for your response.
ScottishPower (Energy Supplier)	Yes.	Thank you for your response.

Question 3:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	Yes, we agree there will be no costs to implement this change from a supplier perspective.	Thank you for your response.
ScottishPower (Energy Supplier)	Please refer to our response to Q1.	Thank you for your response.

Question 4:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to determination by the Authority following approval by the Change Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	No. Whilst this change does impact parties, if this clarification meets the original requirements intended for this reporting these impacts should be immaterial making authority determination unnecessary.	Thank you for your response.
ScottishPower (Energy Supplier)	Yes. This should be subjected to Ofgem approval.	Thank you for your response.

Question 5:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 17 April 2026? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	Yes, there is no need to delay implementation of this change proposal.	Thank you for your response.
ScottishPower (Energy Supplier)	Yes, we agree with the implementation date from the Code Manager.	Thank you for your response.

Question 6:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Utilita Energy (Energy Supplier)	No.	Thank you for your response.
ScottishPower (Energy Supplier)	No further comments.	Thank you for your response.