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01	Proposal Plan
02	Consultation
03	**Final Recommendation**

CHANGE REPORT

R0286 – CLARIFICATION ON DETAILED IMPACT ASSESSMENT ACTIVITIES

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	26 June 2026
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	CHANGE PANEL	**CHANGE PATH**	SELF-GOVERNANCE
PRIORITY STATUS	LOW	**URGENCY**	STANDARD
IMPACTED STAKEHOLDERS	All Rec Parties and All Service Providers		

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

This Change Proposal seeks to formalise the Responsible Committee's approval of a change to release funds for the lead Service Provider to complete design up front as part of the preliminary impact assessment (PIA).

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 26 June 2026.

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BACKGROUND

1 SUMMARY

The first complex technical Change Proposal, R0067 – Introduction of CSS Refresh Functionality, encountered a few challenges within the design and implementation process. This change was scheduled for implementation on 06 December 2023. However, it was deployed with defects and was not fully operational until February 2024. Following this, the Code Manager held discussions, and a formal “lessons learned" session with all Service Providers and identified several challenges with the technical change process.

This approach was initially trialled with R0080 - Improvements to ‘Failed to Deliver’ CSS Messages. The recommendation was completed by the Technical Design Authority (TDA). Feedback was then sought from the Technical Expert Panel (TEP), and RECCo subsequently approved the release of funds for the Service Provider to complete the design as part of the PIA. The detailed design documents were then able to be shared with industry following the completion of the detailed impact assessment (DIA) and prior to the Party impact assessment stage, which highlighted several clarifications required within the design. This enabled the documents to be updated in advance of approval and ensure that the design was fit for purpose across the industry. The full Change Proposal has subsequently been approved and was implemented in June 2025.

2 PROBLEM STATEMENT

The technical change process currently creates five challenges which can be attributed to the timing of the detailed design PIA and DIAs. These are as follows:

1. Lack of Clarity

Where Service Providers and impacted Parties are dependent on each other, it is difficult for them to properly impact assess a change when there is no clarity on the design at the point of a DIA and when PIAs are issued.

2. Limited Feedback

Where design happens post a change being approved, there is no formal opportunity for impacted stakeholders to provide feedback and amendments for the design to ensure that it meets their needs.

3. Misalignment

Where designs are not shared early, assumptions can be made by all impacted Parties, this can be discovered late in the development phase which may cause rework and/or delays to testing or deployment.

4. High Contingency Costs

Where there is uncertainty over design, Service Providers built in a high degree of contingency costs to ensure they have sufficient commercial coverage when completing a DIA.

5. **Inaccurate Timelines**

Completing an end-to-end implementation timeline as part of a DIA without having certainty on design can result in longer timelines being provided, lengthening the change process overall.

3 IMPACTS

CONSUMERS
All Consumers

REC SERVICE PROVIDERS
All Service Providers

RECCO / REC CODE MANAGER
REC Code Manager

REC PARTIES AND SERVICE USERS
All REC Parties

REC DOCUMENTS / PRODUCTS
Schedule 5 – Change Management

MHHS
There is no impact on MHHS.
The benefits gained through the additional clarity would be expected to be similar for the Data Integration Platform (DIP) Manager and DIP Service Provider, similarly to other Service Providers.

4 CROSS-CODE IMPACTS

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

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**01 Dec-25**	**28 Feb-26**
	Solution Analysis	Completed	Completed
	Solution Development	Completed	Completed
	Legal Drafting and Review	Completed	Completed
Change Proposal		**01 Mar-26**	**20 April-26**
	Business Case Assessment	Completed	Completed
	Consultation	Completed	Completed
	Final Determination	April	April
Voting		**21 Apr-26**	**21 Apr-26**
	Appeal Window	22 April	06 May

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 February and March 2026.

6 STAKEHOLDER ENGAGEMENT

The Code Manager has engaged with the Change Issues Group throughout the development of this change and also remained informed about possible changes to the approach in line with Energy Code reform.

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	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	7	7
		Legal and Regulatory Compliance	0	14	0
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	0	10	0
				Overall Priority Score (rounded)	94

Priority Status	LOW
Change Proposal Type	STANDARD

This change was assigned a priority status of 'low' due to its priority scoring of 94.

SOLUTION

8 PROPOSED SOLUTION

The solution proposed is to establish a new approach with the lead Service Provider completing design up front as part of the PIA. The decision to undertake design will be based on the level of complexity of the change and the strength of the business case. The changes will be assessed on a case-by-case basis, if the change is a suitable candidate for design as part of the PIA, a TDA recommendation will be created. This will then be presented to the Responsible Sub-Committee for approval to release the funds for design as part of the PIA. Where the committee does not approve the release of funds, the change will continue down the standard change route and design will be completed following the approval of the full Change Proposal.

To enable and reflect this new approach, the Code Manager will update the REC Schedule 5 – Change Management.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0286 can be found here.

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PRELIMINARY ASSESSMENT

10 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

The Code Manager sought legal advice on whether some level of detail was needed within the legal text, in cases where a Change Proposal would be rejected or withdrawn after the design activity has been approved up front. In the case of a rejection or withdrawal following approval of design upfront, the associated costs would still be paid for, as the design up-front activity would have already be completed before the decision to reject comes into effect. The advice indicated that this level of detail in the legal text was not needed for withdrawal cases.

No other 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 VISIBILITY AND QUALITY SURROUNDING COMPLEX TECHNICAL CHANGES	The implementation of this Change Proposal should provide visibility and improve the quality of complex technical changes delivered through the REC. Currently, design would happen after a change has been approved. This does not allow impacted stakeholders nor Service Providers to provide feedback or amendments to the design to ensure it meets their needs. This change will formalise the design first approach for technical changes, improving the speed and efficiency of complex technical changes which will indirectly benefit Consumers.
IMPROVE CLARITY WITHIN THE DESIGN OF A CHANGE	The implementation of this Change Proposal should provide clarity on the design at the point of a DIA and prior to the Party impact assessment stage, enabling to futureproof issues that could arise. Currently Service Providers and impacted Parties who are dependent on each other cannot properly impact assess a change. By receiving detailed design documents prior to the Party impact assessment, impacted Parties will be aware of any further details that are needed within the design. This change should therefore provide assurance that the design is fit for purpose across the industry at an early stage of the process.
IMPROVE ACCURACY AND TIMELINES WITHIN THE CHANGE PROCESS	The implementation of this change will reduce additional timelines by providing certainty on the design and better alignment to the plan before an end-to-end implementation timeline can be defined. Currently, assumptions made by all impacted Parties are discovered

	late in the development phase which may cause rework and/or delays to testing or deployment.
IMPROVE COST-EFFECTIVENESS SURROUNDING THE ACTIVITIES IN THE CHANGE PROCESS	The implementation of this change should lead to a more efficient technical change process, resolving issues that are detrimental to REC Parties, and improving cost-effectiveness and more accurate costs. Currently, when there is uncertainty over the design of a change, Service Providers built in a high degree of contingency costs to ensure they have sufficient commercial coverage when completing a DIA. By implementing this Change Proposal, a robust and confident approach that supports more accurate costs will be ensured.

11.3 COST BENEFIT ANALYSIS

There are no central system costs and no expected costs to Parties for implementing this Change Proposal. As such, the cost-benefit analysis for this Change Proposal is based upon the four intangible benefits detailed above.

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 visibility, quality and efficiency of complex technical changes delivered through the REC;
- should improve clarity within the design of complex technical changes;
- should improve accuracy and timelines instead of lengthening the change process overall; and
- should improve the cost-effectiveness of the activities in the change process.

13 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 20 February 2026 to obtain views on the Change Report (For Consultation). In total, five responses were received from DNOs, Energy Suppliers and the Central Data Service Provider (CDSP). The key themes from these responses have been summarised and set out below. The non-confidential responses have been published here.

13.1 SUMMARY OF RESPONSES

All respondents were supportive of this Change Proposal and believed it should be implemented, with one Party challenging the proposed solution due to believing that the design

upfront activities should be distinct from the activities undertaken in the DIA. As this is already the case with this proposed solution, the Code Manager broke down the process for further clarity:

- The initial impact assessment (IIA) is conducted depending on the solution > the PIA is conducted > the Responsible Committee approve the design upfront and associated costs > The design phase is completed by the Service Provider > the industry reviews the design > the feedback is taking into account, including refining the design where required > the DIA is conducted following that feedback > the Final approval is received for Build/Test for the Change.

The Code Manager reached out to this Party to verify whether they believed that this explanation was enough to clarify the process or whether they believed some changes would need to be made. No response was received. The Code Manager therefore recommends proceeding with the proposed solution that was presented in the Change Report (For Consultation).

13.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

Most respondents agreed with the proposed solution and provided no comments on the proposed changes to the legal text of REC Schedule 5 – Change Management. Only one respondent commented on the solution, as they believed that the activities related to the design up front should be made distinct from the ones expected in the DIAs – which is already the case with the proposed solution.

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 with one Party questioning whether the benefits of this Change Proposal would only be achieved if a change is approved to go for design up front. The Code Manager reiterated the fact that to undertake design up front, the Responsible Sub-Committee would always have to approve the release of the funds first. Without this approval, the change will continue down the standard process change route with design completed following the approval of the full Change Proposal. The Code Manager also added that the benefits of this Change Proposal would outweigh any risks of a change with design upfront activity being rejected later down the line. This is because the proposal to undertake design upfront activities would be to ensure that the solution of a technical change meets end users' needs before being implemented. Without this approach, there would be a bigger risk for a change to not meet Parties' needs in the end, having been processed with the build and test costs, prior to that realisation. Another Party mentioned that they would need to consult with the DSC Change Management Committee should the Gas Retail Data Agent (GRDA) be requested to undertake design activities. The Code Manager would welcome their involvement when this would be the case.

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 with one Party welcoming clarity on the process. The Code Manager reiterated the process of the proposed solution, which has been detailed in the summary of responses.

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

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 26 June 2026. One Party wanted to have some clarification on whether this new approach would only apply to changes assessed or raised after the implementation date of 26 June 2026. They were made aware that this new approach is currently being utilised in two changes (R0096 – CSS Message Regeneration Functionality and R0080 - Improvements to 'Failed to Deliver' CSS Messages), and this Change Proposal will formalise this process. No other changes are expected to request design up front until R0286 is being implemented.

14 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No changes have been made following consultation.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED CONSULTATION RESPONSES	Link
RELATED CHANGE(S)	R0067 –Introduction of CSS Refresh Functionality R0080 - Improvements to 'Failed to Deliver' CSS Messages R0096 – CSS Message Regeneration Functionality

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16 GLOSSARY

TERM	DEFINITION
Central Data Service Provider (CDSP)	means the 'Central Data Service Provider' appointed by Gas Transporters pursuant to standard special condition A15 (Central Data Service Provider) of the Gas Transporter Licences.
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.
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.
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.
Data Integration Platform (DIP)	means the data integration platform made available pursuant to the BSC.
DIP Manager	means BSCCo or such other entity as is responsible under the BSC for managing the Data Integration Platform.
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.
Responsible Sub-Committee	is described in Paragraph 2.2 of the Change Management Schedule