RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0286 – CLARIFICATION ON DETAILED IMPACT ASSESSMENT ACTIVITIES

On 20 February 2026 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0286.

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

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RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Francine Peyroux-Sissoko

DATE CONSULTATION ISSUED	20 February 2026
RESPONSE DEADLINE	13 March 2026

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SP Energy Networks (Distribution Network Operator)	Yes, SPEN are supportive of this change.	Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	We are inclined to agree with the proposed solution. Our thinking with this change is that it aims to improve design clarity before assessments that will in turn lead to more understandable timelines that allow for better planning. By having better visibility of complex technical changes, the plan would be that we receive detailed design documents earlier, allowing industry to prepare earlier for system or process impacts.	Thank you for your response.
SSE Energy Supply Limited (Energy Supplier)	SSE agrees that the proposed solution would be advantageous as the earlier design is in the process improves our ability to respond to impact assessments.	Thank you for your response.
Xoserve (CDSP)	We agree with the principles that this change is trying to establish. As documented in the change proposal, the REC Change process controls complex system processes, and parties impact assessments will be entirely dependent upon the solution options that have been proposed by 'lead' providers.	Thank you for your response. The Code Manager has added some information about the process below and has also reached out to the Party to ensure the legal text conveyed that process with enough clarity.

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
	We do not agree with the solution as described. We consider that the activities expected of this design will be distinct and outside activities currently expected in DIAs – so should be recognised as a distinct activity. We do however agree that, in certain circumstances, the provision of a more detailed design would form a helpful part of the change process. The impact assessment process (including IIA, PIA and DIA approaches) has been designed to support RECCo and REC parties in developing a full and complete set of requirements, agnostic of solution, with the intention that a solution can then be worked up that meets all these requirements. Typically, multiple options could be provided as part of a PIA for the purposes of testing understanding of requirements and further refining these down to a leading solution as part of the DIA. As such, we think that the ability for the Responsible Sub Committee to instruct design works to be undertaken is correct, but we see that this activity is distinct from the activities undertaken in the DIA – and we believe that it would be helpful to define this as a separate request outside of the existing IA requests. We would expect that DIAs may still be required by the Code Manager in order to refine options to a single solution to progress to the relevant Panel and into 'Design'. We have reservations that by NOT classing this distinct activity separate from the DIA that there is an inference that standard DIAs could include design artefacts going forward or that the Design periods	The detailed impact assessment (DIA) will still be required with this solution. Conducting design upfront would only front-load detailed costs for design into the preliminary impact assessment (PIA). The Code Manager will determine whether design upfront should be pursued for a change during the solution development phase of the change process. This is agreed with the relevant REC Service Provider ahead of triggering the PIA. During the PIA, the Service Provider will provide detailed costs and timelines for the design, and ROM for Build/Test as usual. The costs included within the PIA for design only will then be taken to the relevant Committee for approval to commence the design phase. Once that has concluded and the design has been taken back to industry for review, comment, and refinement if appropriate, the Code Manager will then trigger the DIA to the Service Provider. This DIA will include build and test costs/ timelines, and whether the design has changed through consultation, it will include

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	would be subject to defined timescales associated with the existing IAs. Such design activities will require detailed resource planning and will typically far exceed the timings currently envisaged in paragraph 12 of the Change Management Schedule. We also note that in some instances, working with the Code Manager, we have been able to agree that certain steps within the development process are eliminated – e.g. a DIA is conducted without a PIA. We suggest by creating this Design artefact as a distinct product that this will enable clarity for the Service Provider whilst supporting this flexibility.	some costs associated, which will then go back to the relevant Committee for approval. The activities are therefore distinct as below: 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.
Centrica (Energy Supplier)	We agree with the proposed solution set out in Change R0286 to allow, where appropriate, detailed technical design to be completed upfront as part of the Preliminary Impact Assessment (PIA) for complex technical changes.	Thank you for your response.

Question 2:	**Do you agree with the proposed implementation approach (Big Bang)? If not, please explain why?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SP Energy Networks (Distribution Network Operator)	Yes, we are supportive of the proposed implementation approach.	Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Thank you for your response.
SSE Energy Supply Limited (Energy Supplier)	SSE agrees with the proposed implementation approach. However, we would like clarification as to whether this applies only to changes raised after the implementation date, or does this include in flight changes that have yet to reach PIA stage?	Thank you for your response. This new approach is already being utilised in some changes such as R0096 and R0080. This Change Proposal will formally codify this process. It is not expected that other changes will request a design upfront until R0286 is implemented on 26 June 2026.
Xoserve (CDSP)	We do agree that a single implementation / change would be the best approach to this – noting that stakeholder engagement would be key to achieving this and managing expectations accordingly.	Thank you for your response.
Centrica (Energy Supplier)	We agree with the proposal to implement Change R0286 using a Big Bang approach.	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**
SP Energy Networks (Distribution Network Operator)	Yes.	Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Thank you for your response.
SSE Energy Supply Limited (Energy Supplier)	Whilst we agree with the benefits, we feel that they will only be achieved if a change that goes to design is approved. Where a change has gone to design and not been approved, then this would be wasting money. We would like to understand the criteria in which changes would follow this route.	Thank you for your response. For a Change Proposal to undertake design upfront, the Responsible Sub-Committee would always have to approve to release the funds. It will therefore not be possible for a Change Proposal to have gone to design without being approved first. If the Sub-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. In the case where a Change Proposal has been approved for design activity to be conducted upfront, but ends up being rejected, the associated costs would still be paid for, as the design upfront activity would

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		have already be completed before the decision to reject comes into effect. The Code Manager believes the benefits of this Change Proposal outweigh this known risk. Indeed, the proposal to undertake design upfront would be for cases where end users are impacted by a technical change, providing them an earlier opportunity to contribute to the design approach and ensure the solution meets end users' needs before it is formally implemented. Without the option to have a design upfront, the bigger risk would be that the full change is processed (including the built and test costs) but it does not meet Parties' need once implemented, leading to either having to raise a further change, or does not get utilised by the industry. This would come at a higher cost to Parties than with this new approach proposed with R0286.
Xoserve (CDSP)	With our proposed approach, we would agree that there should be no specific implementation costs associated with this change, the change is seeking to propose the ability for the Code Manager, with the approval of the relevant Sub Committee, to request that Service Providers undertake specific design activities.	Thank you for your response. Whilst the activity in itself is completed ahead of the DIA, the design upfront activity is there to inform the DIA, better informing the activities required, such as for Build/Test, which would

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	If the proposed solution is pursued this is likely to have contractual impacts where DIA activities are defined. We do observe that undertaking detailed design activities divorced from build and test activities have the potential to lead to diseconomies of scale depending on the delivery model adopted by the Service Provider. From a GRDA perspective, we would also need to consult with DSC Change Management Committee with respect to undertaking these design activities. Whilst we would not anticipate that they would prevent activities taking place this would need to be confirmed on a case by case basis in relation to each release.	streamline the process. To ensure there are no contractual impacts for DIA activities, the Code Manager would agree an appropriate period of time for the design activities to take place with the Service Provider. The Code Manager would also ensure that any other changes progressing at the same time are complementary to the design activities to guarantee a secure solution baseline and avoid the necessity to go back and modify the design. This is a standard approach undertaken by the Code Manager and Service Providers where multiple changes are progressing at the same time. As such there is no risk to have diseconomies of scale with this model. During past “lessons learned” sessions, the only detrimental aspect noted was on time taken to complete the activity. However, each change and solution is managed based on its complexity. Therefore, the SLA would have to be flexible to take the time aspect into account as well as the number of changes that are progressing during the same period. This is to ensure risk controls are in place to

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		avoid the likelihood of having to remodel the design activities. The Code Manager would welcome Xoserve's involvement should the GRDA be requested to conduct design upfront.
Centrica (Energy Supplier)	We agree that Change R0286 introduces no additional costs to REC Parties or central systems, as it does not create new financial obligations but instead allows, where justified, existing design activity to be undertaken earlier in the process. We consider the benefits to be material and proportionate, particularly for complex technical changes, as earlier completion of detailed design will improve clarity and quality, enable more accurate impact assessments, support more realistic delivery timelines, and reduce the need for contingency allowances driven by design uncertainty. Overall, we view the proposal as a positive and pragmatic refinement to the REC change process, delivering improved efficiency and reduced delivery risk without increasing costs to Parties.	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 Self-Governance approval by the REC Change Panel?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SP Energy Networks (Distribution Network Operator)	Yes, we agree that this should be subject to self-governance.	Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Thank you for your response.
SSE Energy Supply Limited (Energy Supplier)	SSE agrees with the Code Manager's assessment of the change path.	Thank you for your response.
Xoserve (CDSP)	We have no comments on whether authority or Self Governance.	Thank you for your response.
Centrica (Energy Supplier)	Yes.	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 26 June 2026? If not, please explain why?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SP Energy Networks (Distribution Network Operator)	Yes, we are supportive of the implementation date.	Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	From what we can see we would agree the implementation date.	Thank you for your response.
SSE Energy Supply Limited (Energy Supplier)	SSE agrees with the implementation of 26th June 2026.	Thank you for your response.
Xoserve (CDSP)	As is observed within the Change Report, this approach has already been undertaken for previous changes so we do not think that the Code Manager should be prevented from requesting the Design to be undertaken as an activity distinct from the DIA within the Change Process. We welcome clarity related this to be defined in the Change Schedule outside of Paragraph 12. We feel that an additional step in the process outside the impact assessment would be a more suitable way to achieve the outcome that RECCo are looking for without impairing the impact assessment process. A consideration would be a document that follows a DIA that explores the specifics of a solution without the inclusion of impact assessment narratives, creating clarity on the scope, functionality, dependencies and implementation timescales being proposed. For example:	Thank you for your response. As mentioned in the response to question 1, the proposed model would follow the below process: The 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 design document you are mentioning would therefore come before the

Question 5:	**Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 26 June 2026? If not, please explain why?**	
	IIA > PIA > DIA > [Additional Solution Confirmation doc.]	DIA is conducted, from when the design is being approved.
Centrica (Energy Supplier)	We consider the proposed implementation date of 26 June 2026 to be appropriate and proportionate. While Change R0286 does not require system or Party changes, it amends REC Schedule 5 (Change Management) and introduces a new governance approach that needs to be applied prospectively and consistently.	Thank you for your response.

Question 6:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SP Energy Networks (Distribution Network Operator)	SPEN have no other comments.	Thank you for your response.
National Grid Electricity Distribution (Distribution Network Operator)	N/A	Thank you for your response.
SSE Energy Supply Limited (Energy Supplier)	No further comments to add at this stage.	Thank you for your response.
Xoserve (CDSP)	No	Thank you for your response.
Centrica (Energy Supplier)	No	Thank you for your response.