RETAIL ENERGY CODE

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

CHANGE REPORT

R0319 – CLARIFICATION OF IN-YEAR AMENDMENTS TO THE CRS BUDGET

DOCUMENT VERSION	V1.1
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	CRS Provider, RECCo		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	ASSURANCE LEAD
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OVERVIEW

This Change Proposal seeks to amend Clause 9 of the REC Main Body so that it is not a requirement to raise a Change Proposal to facilitate an in-year reduction to the Centralised Registration Service (CRS) budget.

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

This Change Proposal seeks to amend Clause 9 of the REC Main Body so that it is not a requirement to raise a Change Proposal to facilitate an in-year reduction to the CRS budget.

Clause 9 of the REC Main Body currently sets out that any amendments to the approved CRS budget for each Financial Year may only be amended through a REC Change Proposal. The intention of this clause was to ensure that any additional funding required by the CRS Provider, outside of the approved budget cycle, was subject to appropriate scrutiny, consultation and approval under REC governance. This was not intended to apply to a scenario where the CRS Provider expects to significantly underspend against the approved budget, and these funds can be returned to REC Parties within the Financial Year through a reduction to the approved budget. This scenario has previously occurred in the REC and the current drafting in Clause 9 is not clear as to whether a Change Proposal is required to facilitate this. A recent Change Proposal (R0309 – In-year CRS budget amendment) has been raised to facilitate this scenario.

2 PROBLEM STATEMENT

This Change Proposal seeks to amend Clause 9 of the REC Main Body so that it is not a requirement to raise a Change Proposal to facilitate an in-year reduction to the CRS budget.

Requiring Change Proposals to be raised to facilitate an agreed in-year reduction to the CRS budget diverts cost and resources from the Code Manager, CRS Provider and REC Parties.

3 IMPACTS

RECCO / REC CODE MANAGER	REC SERVICE PROVIDERS	REC DOCUMENTS / PRODUCTS
RECCo	CRS Provider	REC Main Body

MHHS
There are no impacts to MHHS identified as part of this Change Proposal.

4 CROSS-CODE IMPACTS

There are no cross-code impacts identified as part of this Change Proposal.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**27 Feb-26**	**09 Apr-26**
	Code Manager Initial Assessment	February	March
	Legal Review	March	March
Change Proposal		**10 Apr-26**	**18 May-26**
	Consultation	April	May
	Final Determination	May	May
Voting		**19 May-26**	**19 May-26**
	Appeal Window	20 May	03 June

6 STAKEHOLDER ENGAGEMENT

RECCo engaged with the CRS Provider ahead of raising this Change Proposal to ensure they were supportive of the proposed changes of R0319. The CRS Provider also had the opportunity to provide further feedback through the consultation.

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	0	27	0
	Retail Markets Impact	Innovation and Market Arrangements	0	17	0
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	3	7	20
		Legal and Regulatory Compliance	1	14	14
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	1	10	10
				Overall Priority Score (rounded)	88

Priority Status	LOW
Change Proposal Type	STANDARD

The Code Manager has designated this Change Proposal a priority status of low, with a weighted score of 88. This is due to the minimal impact borne by Consumers and the Retail Market as part of the implementation of this Change Proposal. This Change Proposal will improve the operational effectiveness and efficiency of RECCo and the CRS Provider by removing the need for the CRS Provider to raise a Change Proposal when they expect to underspend their budget. Requiring Change Proposals to be raised to facilitate an agreed in-year reduction to the CRS budget diverts cost and resources from the Code Manager, CRS Provider and REC Parties.

SOLUTION

8 PROPOSED SOLUTION

The proposed solution is to amend the REC Main Body, Clause 9.33 to clarify that in-year adjustments to the budget within the limits defined in the approved budget, including forecast underspend, can be approved by the RECCo in accordance with Clause 9.11. This will allow a more efficient process for managing these scenarios, where forecast underspend can be returned to REC Parties as soon as possible, without diverting resources from the REC Change Team and industry Parties reviewing an additional Change Proposal.

The following changes are proposed to the REC Main Body:

> 9.33 Once the budget for Centralised Registration Service charges in a Financial Year has been agreed or determined under this Clause 9:
>
> > a. if the CRS Provider proposes a reduction in the CRS budget for the Financial Year, then such amendment may be agreed by the RECCo; and
> >
> > b. any other amendment to the CRS budget for the Financial Year shall only be amended if such amendment is approved under the Change Management Schedule as if the amendment was an amendment to this Code.
>
> 9.34 Where the CRS budget is amended under Clause 9.33, the monthly invoices under Clause 9.25 shall be calculated so as to recover the budgeted sum in respect of the relevant year (without necessarily being one twelfth of the annual figure).

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0319 can be found here.

10 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

There are no risks, assumptions, issues or dependencies identified for this Change Proposal.

11 BUSINESS CASE ASSESSMENT

11.1 COSTS

There are no costs associated with this Change Proposal.

11.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
IMPROVE OPERATIONAL EFFICIENCY OF THE REC CHANGE PROCESS	The implementation of R0319 will allow for a more efficient process for managing scenarios where the CRS Provider expects to significantly underspend (even within the limits defined in the approved REC budget). The proposed amendments should ensure that forecast underspend can be returned to REC Parties as soon as possible, without diverting resources from the REC Code Manager and industry Parties through reviewing an additional Change Proposal.
IMPROVE LEGAL CLARITY OF THE REC	Currently, the REC Main Body sets out that any amendments to the approved CRS budget for each Financial Year may only be amended through a REC Change Proposal. It was not the intention of this clause to necessitate a Change Proposal to be raised for *all* in-year amendments to the CRS budget; only that any additional funding required by the CRS Provider, outside of the approved budget cycle, was subject to appropriate scrutiny, consultation and approval under REC governance. The implementation of R0319 will amend the REC Main Body to reflect this intention and deliver improved legal clarity, as well as effectiveness to the REC Change process.

11.3 COST BENEFIT ANALYSIS

There are no central systems costs, no expected costs to Parties and two intangible benefits associated with this Change Proposal. As such, the Code Manager believes that there is a positive case for change.

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;
- Will improve the efficiency of the REC Change Process by allowing proposed amendments for forecasted underspend of the CRS budget to be returned to REC Parties as soon as possible, without diverting resources from the REC Change Team and REC Parties; and
- Will provide improved clarity for industry, RECCo and the CRS Provider regarding the approval process for the CRS budget and reduces the ambiguity in the obligations of the Code Manager and the CRS Provider.

13 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 09 April 2026 to obtain views on the Change Report (For Consultation). In total, three responses were received from the CRS Provider and two Distributed Network Operators. 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

The respondents were supportive of the Change Proposal, the proposed solution and the implementation date.

13.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

The respondents were supportive of the Change Proposal and proposed legal text changes. The CRS Provider noted that they had submitted two Change Proposals in subsequent years, as per REC Main Body Clause 9.33, and had previously flagged that the process would benefit from a review. As such, they were supportive of the progression of this Change Proposal.

13.3 BENEFITS RELATIVE TO IMPLEMENTATION AND OPERATIONAL COSTS

The respondents agreed with the Code Manager's assessment of the costs and benefits for this Change. No further costs nor benefits were identified by respondents.

13.4 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

The respondents agreed with the Code Manager's assessment of the case for change and be subject to the Self-Governance Change Path with approval by the Change Panel.

13.5 IMPLEMENTATION DATE AND APPROACH

The respondents agreed with the Code Manager's recommendation that the Change Proposal should be approved for implementation on 26 June 2026, as well as the implementation approach of Big Bang.

14 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

DOCUMENT	SECTION	AMENDMENT	REASON
R0319 – REC Main Body – v2.0	9.33 (a)	(a) if the CRS Provider proposes a reduction in the CRS budget for the Financial Year, then such amendment may be agreed by RECCo; and	Following the DCC's response to the consultation, the Code Manager facilitated a discussion between DCC and RECCo to determine the process to seek approval of a budget reduction, where there is forecasted underspend.

			RECCo advised that, in reality, the agreement to amend the budget is reached by the RECCo and DCC finance teams, so as to not wait for the Board to reconvene. Thus, to better reflect the reality of this process, the proposed new sub-clause 9.33 (a) should be amended to refer to RECCo, and not the REC Board.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
RELATED CHANGE(S)	R0226 – In-year CRS budget amendment R0309 – In-year CRS budget amendment
CONSOLIDATED CONSULTATION RESPONSES	Link

16 GLOSSARY

TERM	DEFINITION
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.
CRS Provider	means the DCC when performing the functions and services required by Condition 15 (Incorporation, delivery and provision of the Centralised Registration Service) of the DCC Licence.
Financial Year	means 1 April to 31 March (inclusive) each year.