RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0330 – USE OF REL DATA BY THE AUTHORITY

On 12 June 2026, the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0330 – Use of REL Data by the Authority.

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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RESPONSE TYPE	Non-Confidential
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RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Bela Ashworth

DATE CONSULTATION ISSUED	12/06/2026
RESPONSE DEADLINE	03/07/2026

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	We recognise that the current restrictions on the use of Retail Energy Location (REL) Address data limit the Authority's ability to deliver key policy initiatives, specifically the government's Bill Discount Scheme. The proposed amendments to allow the Authority wider access to REL data are a pragmatic and proportionate approach to enabling this scheme while maintaining existing restrictions for other Parties.	Thank you for your comments.
SP Energy Networks (Distribution Network Operator)	Yes, we are supportive of this Change Proposal	Thank you for your comments.
Smart DCC Limited (DCC)	Yes, with the below feedback. The proposed amendments to Schedule 29 clause 1.4 are quite broad compared to the EES Service Definition as the amendment is not Authority-specific. We suggest that the Code Manager adds the restriction that is in the EES Service Definition in terms of utilising the REL data, provided the party has the appropriate licence. How do we, as the Switching Operator know that parties who are being given access to REL data have the correct OS licence? Therefore ensuring that the commercial terms between DCC and its Service Provider Landmark relating to OS licencing are maintained. It would also be beneficial to understand what assurance processes the EES will have to ensure the appropriate OS licence is in place for	Thank you for your comments. Following engagement with REC legal, the Code Manager is of the view that the consulted amendments to Schedule 29, when read in conjunction with the Data Access Matrix to which it refers, is sufficient to confirm that the Authority has access to REL Address data for purposes beyond Switching. As such, further amendments to Schedule 29, clause 1.4 to restrict the use of REL Address data is not necessary.

	parties other than the Authority. DCC believes it is key that the relevant assurance activities are in place due to the content of the REL data (for example, the UPRN).	
NGED (Distribution Network Operator)	Yes, we agree with the proposed solution. The change enables the Authority to access REL Address data for the purpose of delivering the Bill Discount Scheme whilst it retains restrictions for other Parties. We believe the legal text changes provide additional clarity on data access with no identified system costs or cross code impacts.	Thank you for your comments.
Scottish Power (Energy Supplier)	Yes, we agree with the proposed solution.	Thank you for your comments.

Question 2:	Do you agree with the proposed implementation approach (BIG BANG)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	We support the proposed Big Bang implementation approach. Given the low complexity of the change, the absence of central system impacts or costs, and the time sensitivity associated with delivery of the Bill Discount Scheme, this approach appears appropriate and proportionate.	Thank you for your comments.
SP Energy Networks (Distribution Network Operator)	Yes, we see no other efficient way of implementation	Thank you for your comments.
Smart DCC Limited (DCC)	Yes	Thank you for your comments.
NGED (Distribution Network Operator)	Yes.	Thank you for your comments.
Scottish Power (Energy Supplier)	Yes, we agree with the proposed implementation approach.	Thank you for your comments.

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**
British Gas (Energy Supplier)	We agree with the Code Manager's assessment of the costs and benefits for this change. We note that there are no central system costs and no expected costs for Parties, while the benefits are primarily strategic and consumer focused. In particular, the change supports delivery of the Bill Discount Scheme, which will provide direct financial support to eligible households, and enables wider government and regulatory initiatives through improved access to REL data.	Thank you for your comments.
SP Energy Networks (Distribution Network Operator)	Yes	Thank you for your comments.
Smart DCC Limited (DCC)	Yes	Thank you for your comments.
NGED (Distribution Network Operator)	Yes. We agree with the assessment that this change presents a positive case for change. The proposal delivers support for the Bill Discount Scheme, with no central system costs or party costs.	Thank you for your comments.

	We also agree that the change gives clarity regarding REL data access and use.	
Scottish Power (Energy Supplier)	Yes.	Thank you for your comments.

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 Change Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	We agree that Self-Governance is an appropriate Change Path. The proposal is limited in scope and complexity, does not introduce costs for Parties or central systems, and has no cross-code impacts. It primarily facilitates access for the Authority rather than imposing new obligations on Parties. On this basis, we agree that the change does not meet the threshold for Authority determination and can appropriately be progressed via Self-Governance.	Thank you for your comments.
SP Energy Networks (Distribution Network Operator)	Yes, we are supportive of the self-governance approach	Thank you for your comments.
Smart DCC Limited (DCC)	Yes	Thank you for your comments.
NGED (Distribution Network Operator)	Yes.	Thank you for your comments.
Scottish Power (Energy Supplier)	Yes.	Thank you for your comments.

Question 5:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 31 July 2026? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	We support the proposed implementation date of 31 July 2026. We recognise the importance of aligning implementation timelines with the delivery requirements of the Bill Discount Scheme, including the need for the Authority to access REL data in advance of the scheme go-live.	Thank you for your comments.
SP Energy Networks (Distribution Network Operator)	Yes	Thank you for your comments.
Smart DCC Limited (DCC)	Yes, provided the Code Manager / Proposer responds to our Question 1 response.	Thank you for your comments.
NGED (Distribution Network Operator)	Yes.	Thank you for your comments.
Scottish Power (Energy Supplier)	Yes.	Thank you for your comments.

Question 6:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	We support the intent of this Change Proposal and recognises its importance in enabling delivery of the Bill Discount Scheme. However, we note that this proposal sits within a broader and ongoing discussion regarding the use of Retail Energy Location (REL) data beyond switching. Through internal engagement and industry discussions, it is clear that the current restriction on REL data usage creates wider challenges for Suppliers, particularly in establishing an accurate and consistent view of premises data across the market. This can ultimately contribute to poorer customer outcomes. We understand that these broader challenges are already being considered under REC Issue I0218 – Proposal to Enable Broader Use of Retail Energy Location (REL) Data for Non-Switching Applications, which is exploring options to extend access to REL data beyond switching use cases.	Thank you for your comments. The Code Manager will engage further with the respondent to discuss REL data access challenges for Suppliers, potentially within the scope of REC Issue I0218.
SP Energy Networks (Distribution Network Operator)	No additional comments	Thank you for your comments.
Smart DCC Limited (DCC)	Does this make grammatical sense in Schedule 29: 1.4. REL Addresses are synchronised to the Electricity Enquiry Service (EES) and Gas Enquiry Service (GES) and are made available to Enquiry Service Users as part of the Enquiry Services, including so	Thank you for your comments. The Code Manager has amended the legal text to remove 'including'.

	that Switching Parties (including Price Comparison Websites) can raise enquiries against them for the purpose of enabling Switching, including for the purpose of design, development, testing, integration and live operational use.	
NGED (Distribution Network Operator)	NA.	N/A
Scottish Power (Energy Supplier)	We welcome this change and support its intended objectives. We encourage the Code Manager and by extension the DCC to continue prioritising the resolution of address-related issues across the industry. Doing so will help minimise the occurrence of incorrect address-to-plot queries and ensure that the effectiveness of the bill discount scheme is not compromised by underlying data quality and address-matching challenges.	Thank you for your comments.