RETAIL ENERGY CODE

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## NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

# REC PERFORMANCE ASSURANCE OPERATING PLAN (PAOP) FOR 2025-26

On 01/08/2025 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for REC Performance Assurance Operating Plan (PAOP) for 2025-26

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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| **DOCUMENT VERSION** | Version 1 |
| **RESPONSE TYPE** | NON-CONFIDENTIAL |
| **DATE ISSUED** | 18/08/2025 |
| **RESPONSIBLE COMMITTEE** | Performance Assurance Board |
| **LEAD ANALYST** | Vaishnavi Campbell-Sharma |

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| **DATE CONSULTATION ISSUED** | 01/08/2025 |
| **RESPONSE DEADLINE** | 15/08/2025 |

| Question 1: | **Do you agree with the activities proposed by the Code Manager within the Performance Assurance Operating Plan for 2025-26? If not, please provide detail within your response.** | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| Scottish Power Energy Networks (DNO) | We are supportive of the activities proposed by the code manager within the plan for 2025-2026. | Thank you for taking the time to respond to the consultation and supporting the activities proposed within the PAOP for 2025-26. |
| Smart DCC Limited (REC Service Provider) | Yes. As per our response to the survey issued in July 2025, DCC is satisfied with the proposed activities to be included in the next iteration of the POAP. | Thank you for taking the time to respond to the consultation and supporting the activities proposed within the PAOP for 2025-26. |
| ScottishPower Energy Retail Ltd (Supplier) | We welcome the opportunity to respond to this consultation on the Code Manager's Performance Assurance Operating Plan and proposed activities for 2025-2026. We also welcome the Code Manager's intention (3.1) to revisit the escalations processes outlined under REC schedule 30. We believe this is a beneficial exercise, especially in light of ongoing challenges with certain operational processes. We would particularly encourage the Code Manager to prioritise improvements to the crossed meter processes. While we recognise that other processes may also require attention, we recommend a focused approach to resolving the persistent issues associated with crossed meters. We have previously raised concerns about this process with the Code Manager, including through discussions at the REC Issues Group (RIG). We believe that the current resolution pathway does not adequately address scenarios | Thank you for taking the time to respond to the consultation and supporting the activities proposed within the PAOP for 2025-26.<br><br>We acknowledge your emphasis on prioritising improvements to the crossed meter processes. This will be looked at as part of the deep dive on escalation and SDEP processes. We will engage with you during the scoping phase to ensure your feedback is appropriately understood and considered through the deep dive.<br><br>For clarification, R0122 is looking at delivering functional improvement to SDEP. |

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| | where a case has been escalated to the other supplier with all relevant supporting evidence, but the supplier is unable to contact their customer through either phone calls, written correspondence and site visits. In such cases, one proposed solution has been to duplicate the meter on ECOES. While this may resolve the immediate issue, it introduces a data duplication problem and consequently a data cleanse issue for industry. Moreover, if the other supplier continues to attempt contact without success, the situation can become deadlocked. This often leads to the affected consumer escalating the matter to the Ombudsman, resulting in formal complaints and a poor customer experience. This situation does not make for a good customer journey and is far from ideal. We therefore recommend the Code Manager revisits the process with a view to establishing, in consultation with industry, clearer rules that set out what suppliers should do to resolve such cases effectively. We also hope that the feedback from R0122 SDEP Review Improvements Usability can be taken into consideration when carrying out this review. | Our review will not focus on the tool but the processes with an aim to understand how Code processes can be improved to reduce the need for escalation. |

| Question 2: | Are there any activities you propose we should reprioritise? If yes, please provide detail within your response. | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| Scottish Power Energy Networks (DNO) | SPEN have not identified any additional activities that we believe should be looked at. | Thank you for taking the time to respond to the consultation. |
| Smart DCC Limited (REC Service Provider) | No. The updated POAP broadly reflects our response to the July 2025 survey. | Thank you for taking the time to respond to the consultation and recognising that your feedback has been taken onboard whilst developing the PAOP. |
| ScottishPower Energy Retail Ltd (Supplier) | No comments. | Thank you for taking the time to respond to the consultation. |

| Question 3: | **Are there any activities, including those beyond the PAOP, which the Code Manager should consider while scheduling the PAOP as it may impact the availability of relevant resources from your organisation to support delivery? If yes, please provide detail within your response.** | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| Scottish Power Energy Networks<br>(DNO) | We would appreciate cognisance of the work currently being taken by parties to support delivery the MHHS Programme, just conscious that there may be a conflict with specialist resource across the industry to provide input into activities at various times. | Thank you for taking the time to respond to the consultation. We are cognisant of the demand on REC Parties by major market transformation programmes like MHHS and have reflected on that whilst proposing a focussed list of activities for PAB to priorities. We will work with you to ensure we can receive the input from industry specialists as it is very valuable in shaping key initiatives under the REC. |
| Smart DCC Limited<br>(REC Service Provider) | DCC notes that the validity of the 2025/26 POAP will coincide with Market-wide Half Hourly Settlement (MHHS) activities including migrations which will impact numerous industry parties. DCC advises that its role in delivering MHHS and obligations under its Licence and industry Codes (with either direct or in-direct impacts on DCC) may be prioritised. Communication between the Code Manager, the MHHS Programme and DCC (other impacted stakeholders as required) will be of key importance during this time. | Thank you for highlighting this. We agree that clear and timely communication between the Code Manager, DCC and the MHHS Programme is essential. |
| ScottishPower Energy Retail Ltd<br>(Supplier) | No comments. | Thank you for taking the time to respond to the consultation. |

| Question 4: | **During the PAB deep dives, the Code Manager intends to work with volunteers from 'Responsible Parties' and 'Beneficiary Parties' during the scoping and assessment phases. Whilst we will reach out for volunteers closer to the time through regular Code Manager communication channels, please indicate if your organisation is interested if your organisation is interested in supporting any particular deep dive. Please also specify which activities you are interested in supporting.** | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| Scottish Power Energy Networks (DNO) | We have not identified any specific topic/resource for deep dives at the moment, we will however review at the relevant point to ensure engagement where appropriate. | Thank you for taking the time to respond to the consultation and we appreciate your commitment to engage with PAB initiatives where appropriate. We will use the regular REC communication channels such as the bulletins to invite volunteers to participate in the deep dives and encourage you to monitor those. |
| Smart DCC Limited (REC Service Provider) | As with the 2024/25 'Deep Dive' activities DCC is keen to work with the Code Manager in advance of the formal request for information in order to understand / agree scope and proposed deliverables. To ensure future 'Deep Dive' activities are efficient, the stages must be mapped out and timing agreed in advance. This should include, as a minimum:<br>• Confirmed Scope;<br>• Relevant PAB meetings;<br>• Audit Start/End Dates; and<br>• Findings Review Period. | Thank you for your feedback. We have made note of this. For activities impacting REC Service Providers, we will write to you and set these out at the start of the performance year to support your planning. We will also have further engagement closer to the scheduled activities. Similarly, for other REC stakeholder e.g. REC Parties and Non-Party Users, we will use the Code Manager communication channels to provide timely updates. |
| ScottishPower Energy Retail Ltd (Supplier) | We are open to working collaboratively with the Code Manager in its review of Performance Assurance structures, subject to resource availability at the times. | Thank you for taking the time to respond to the consultation and we appreciate your commitment to engage with PAB initiatives where possible. We will use the regular REC communication channels such as the bulletins to invite volunteers to participate in the deep dives and encourage you to monitor those. |

| Question 5: | **Do you have any additional feedback on the Performance Assurance Operating Plan which you would like to share with the Code Manager for consideration? Please elaborate.** | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| Scottish Power Energy Networks (DNO) | We have no additional feedback at this point. | Thank you for taking the time to respond to the consultation. |
| Smart DCC Limited (REC Service Provider) | Following on from Question 4., DCC requests that in relation to performance assurance activities, the Code Manager notifies DCC of the upcoming activity / request in a timely manner, to ensure positive collaboration, allocation of resource and delivery within the required timescales. As DCC does not have permanent representation at the PAB, visibility of all performance assurance activities can at times be challenging. | Thank you for your feedback. Our Service Provider Assurance team member will write to you in September to set out the schedule for the rest of the year, including key dates for PAB and other deliverables. |
| ScottishPower Energy Retail Ltd (Supplier) | In the context of 3.4 of the PAOP, R0155 Change of Occupier: Evidentiary Standards and Timescales has been one of the most significant changes implemented so far this year. We remain supportive of the underlying principle of the change, which aims to bring greater consistency and clarity to the Change of Occupier (COT) process. However, at this stage we are unable to confidently assess whether the change is delivering the intended benefits as originally envisioned by Ofgem. The scope and intent of the change, as outlined by Ofgem, was for the Code Manager to establish a standardised and consistent set of evidentiary requirements to validate a COT. In this light, we believe that the actual benefits of this change should be kept under review and, should it be the case that they are not substantive, appropriate revisions to the Code should be considered. | Thank you for your feedback. Your views align with our rationale to scope the review of critical changes under the REC within the PAOP to ensure the changes have delivered the benefits they set out to delivered, and also identify further opportunities to improve outcomes for consumers as well as market participants. |