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ASSESSMENT OF CRITICAL REC CHANGES DELIVERED

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FOR DECISION 	The Code Manager requests PAB **APPROVE** the proposed scope and activities of the Deep Dive on 'Assessment of Critical REC Changes Delivered'.

1 CONTEXT

1.1 OBJECTIVE

On 26 August 2025, PAB approved the 2025-26 Performance Assurance Operating Plan (PAOP) which included a Deep Dive on 'Assessment of Critical REC Changes Delivered'. This activity was added to the PAOP as recent change process reviews indicated challenges in identifying, delivering, and realising benefits of REC changes.

We will therefore review a significant recent change to identify to what extent it met the intended benefit of the change, whether the problem statement was addressed, else whether further work is needed.

This review will focus on *R0155 Change of Occupier: Evidentiary Standards and Timescales* as this issue had a wide impact across REC Party and Non-Party stakeholders, clear objectives that the change sought to achieve, and recent reporting data from Suppliers that evidences the impact of the change.

Finally, we will consider whether any retrospective learnings from reviewing R0155 would have helped other recent changes achieve their intended goals; the output from this will then form recommendations for future REC Changes.

Consequentially, the direct beneficiaries of this Deep Dive will be REC Stakeholders that interact with the REC Change process.

Ultimately, the objective of this Deep Dive is to give stakeholders confidence that the REC is operating effectively and meetings its objective of achieving sustainable innovation and continuous improvement."



1.2 R0155 BACKGROUND

R0155 Change of Occupier: Evidentiary Standards and Timescales was implemented on 27 June 2025, with the Change Report outlining the Problem Statement and Proposed Solution. Below are relevant excerpts from these sections:

Problem Statement

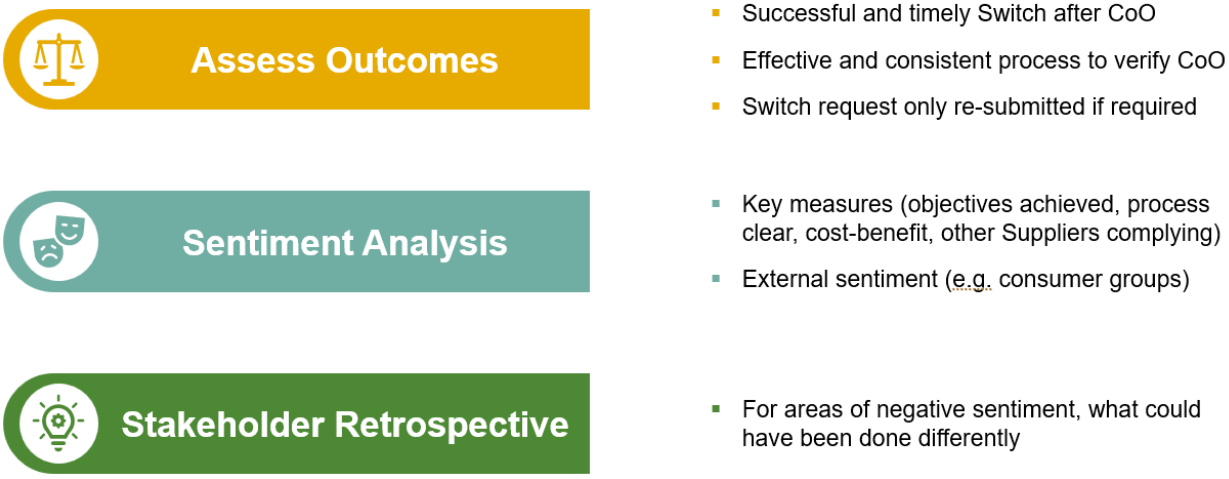
- Non-Domestic Consumers may struggle to quickly and easily update a supplier when they become the new owner/occupier or responsible bill payer for a property.
- Energy Suppliers may struggle to quickly and easily update their billing and contractual records for non-domestic properties.
- Third Party Intermediaries (TPIs) may struggle to provide Non-Domestic Consumers and Energy Suppliers with a service.

Proposed Solution

The proposed solution for R0155 has focused on an evidentiary list of documents that Energy Suppliers may wish to refer to determine if a CoO has taken place. It has also focused on required SLAs for Energy Suppliers to review evidentiary documents and communicate the outcome of their review process to the provider of the evidence (either the Consumer or a TPI).

2 DEEP DIVE ACTIVITIES

2.1 REVIEW R0155 EFFECTIVENESS



Firstly, we will review to what extent the problems identified in R0155 have been resolved. Using data provided by Suppliers and by REC Services, we will be able to assess how the following outcomes have changed in the months following the implementation of R0155:

- Proportion of Change of Occupier Switch requests successfully completed
- Average timeframe to resolve Change of Occupier requests
- Repeated raising of, and Objections to, duplicate Change of Occupier Switch requests

We will then supplement these objective outcome measures with subjective sentiment analysis from Parties on to what extent they believe the objectives of R0155 have been met. Specifically, we will survey Parties to understand to what extent they believe, since the implementation of R0155, that:

- The Problem Statement set out in R0155 has been resolved
- Whether the Non-Domestic Change of Occupier process is clearly set out in the Code and guidance
- Whether the benefits of the change have outweighed the costs
- Whether other Parties are acting in-line with their REC obligations

We will also engage with external stakeholders, such as consumer groups and TPIs, on to what extent they believe that R0155 has achieved the expected benefits to industry.

Finally, we will conduct a retrospective review session with the stakeholders above to understand whether any elements of the change process were a key driver for any positive or negative outcomes or areas of strong sentiment. This could encompass any part of the change lifecycle, from how the change is raised and managed, to how the change is communicated and subsequently reviewed. It will also include considering the outputs from the Change such as Code drafting, Code Manager guidance, and Performance Assurance activities.

We will then report the final conclusions to PAB, before sharing the output with the wider industry.

2.2 PLANNED TIMEFRAMES

Activity	Dec-25	Jan-26	Feb-26	Mar-26	Apr-26	May-26	Jun-26
Launch Activities	PA Webinar	PAB Paper to Approve Scope					
R0155 Review			Review reporting received (PARC #1450) and conduct surveys				
Form Recommendations				Form Initial Recommendations and Review Output with Parties		Finalise Recommendations	
Close Activity						Report Final Conclusions to PAB	Share Recommendations, Report to Industry

3 NEXT STEPS

3.1 PAB DECISION

At the Performance Assurance Webinar on 11 December 2025, the Code Manager presented the planned scope of the Deep Dive to REC Parties and other industry attendees, including the intention to focus the review on R0155; no questions, comments, or concerns were raised by REC Parties on the planned scope of this Deep Dive.

PAB DECISION



The Code Manager requests PAB **APPROVE** the proposed scope and activities of the Deep Dive on 'Assessment of Critical REC Changes Delivered'.