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CODE MANAGER RESPONSE TO THE CONSULTATION ON THE YEAR 2 PERFORMANCE ASSURANCE OPERATING PLAN (PAOP)

The Performance Assurance Operating Plan (PAOP) sets out Performance Assurance activity for the upcoming year. It identifies areas that are particular priorities for the Performance Assurance Board (PAB) and will be focus areas to improve performance.

The Code Manager issued a consultation on changes to the PAOP on 28 September 2022, with the response deadline on 12 October 2022. Seven responses were received, two from Suppliers, one Gas Transporter (GT), one Metering Equipment Manager (MEM), two Distribution Network Operators (DNOs) and one Service Provider. The responses received from industry and the Code Manager's response to these is summarised below. The full list of consultation responses and the Code Manager's response to these can be found in **Appendix A.**

1. What changes, if any, would you suggest to the proposed focus areas and indicative activities for Year 2, as set out in the PAOP?

Summary: There was general agreement with the proposed focus areas for Year 2, with a small number of suggested changes. A MEM suggested that attention is focused on the effort that is spent on market entry processes, as well as whether effort had been considered relating to the MHHS programme. A Supplier did not suggest any changes to the focus areas, however mentioned the importance of the Performance Assurance Dashboards that have not yet been implemented, as well as the need for Performance Assurance and change to more closely integrate.

Code Manager response: We appreciate that the Performance Assurance Dashboards are being implemented later than anticipated, and agree that they will be a critical part of our approach going forward. Industry engagement on the Dashboards will start from November 2022. We also agree that a large proportion of time in Year 1 was spent on Market Entry processes, as outlined in our annual report. We implemented a number of market entry process improvements and will continue to look to make improvements in Year 2.

2. Current Market Conditions – What changes, if any would you suggest to the planned activity related to Current Market Conditions (pg.7)?

Summary: There was general agreement with the current market conditions and planned activity as set out in the PAOP. A DNO raised that they were supportive of the approach for DNOs and GTs to self-report on PSR accuracy, and asked for feedback to be communicated in a timely manner. A Supplier raised some additional considerations related to current market conditions, including better monitoring of where Energy Consumers are changing habits, Debt Management changes and focusing more on how to remove the market barriers for Prepayment customers.

Code Manager response: We welcome the support for the self-reporting approach on the PSR, and will set out a plan for this early in the New Year. We have also taken on board the feedback regarding following up with DNOs and GTs in a timely manner and will make sure this is addressed in Year 2. The current approach on market conditions is to focus on areas within the vires of the REC, as this is the consistent steer we have had from the majority of Parties. We understand that some Parties are looking for the Performance Assurance team to look more strategically, not just on Code compliance but how the rules of the Code are set.

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3. Communications - What information would you find useful to receive on a regular basis on Performance Assurance activities?

Summary: Five respondents identified areas for improvements related to communications, and there was support for the proposed quarterly sessions to update industry on Performance Assurance activity. A MEM asked if more could be done to share discussions from PAB meetings, so there is greater visibility of the issues raised. A Supplier mentioned some specific examples where improvements could be made, such as communications related to ICO discussions and information distributed through the weekly communications bulletin.

Code Manager response: We agree there needs to be transparency with how performance is measured, and the performance dashboards will be a critical part of giving Parties visibility of their own performance. In terms of visibility of PAB discussion, we are pleased to share that there have recently been changes to the process of publishing Committee draft minutes which mean from November onwards we will be publishing the draft minutes a week after the meeting (rather than waiting for these to be finalised at the following meeting), which will give more context to decisions and discussion items being raised at the meeting. We are aware that there is still an outstanding query with the ICO, and we have been working with the PAB Chair to try and progress this to resolution. In the absence of an update from ICO and an understanding of next steps, we continue to progress with our party data submission approach, to enable our assurance to be dynamic and data-led.

4. Direct Assessments – What changes, if any, would you suggest to our planned activity on direct assessments (pg. 15)?

Summary: There was support for the approach to self-assessments for DNOs and GTs related to the PSR. A Supplier raised a concern about potential duplication with assessment activity.

Code Manager response: We appreciate the concern around duplication and have reviewed any potential duplication of effort with UNC and BSC, and agreed information-sharing approaches to try to minimise this. On our activity on the PSR, we have engaged with Ofgem to avoid potential overlap. If there are further areas that need to be considered we'd encourage Parties to let us know about these, as overlap is something we work to actively avoid.

5. Service Provider Assurance – What changes, if any, would you suggest to the prioritisation of the assurance over Central Service Providers (pg. 16)?

Summary: We received four responses related to Service Provider assurance, with three stating they agreed with the prioritisation and had no suggested changes to make. A Service Provider asked if the Performance Assurance team would be assessing their own performance, and a MEM asked if DTN performance was in the scope of the REC. A DNO commented that a greater focus may be required on ETTOS given the current market conditions which may lead to more energy theft.

Code Manager response: We can confirm that RECCo is responsible for assessing the performance of the Performance Assurance team, it does not perform assurance on its own activities. It is not within the scope of the REC to provide assurance over the DTN. On ETTOS, we think the current prioritisation is proportionate and have therefore not updated the PAOP, however this can be reviewed at a future point if market conditions indicate further assurance is required on ETTOS or in response to changes to RECCo's theft reduction strategy.

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6. What areas of activity, if any, do you feel should be prioritised that are not currently outlined in the PAOP? What activity would you de-prioritise as a result of this new activity?
Summary: Three responses suggested additional activity, with one Supplier suggesting we focus on unallocated transactions, and another Supplier suggesting a focus on the PSR using an outcomes based approach. A Service Provider suggested a focus on Code Manager readiness and expertise to be able to identify impacts related to change proposals. **Code Manager response:** We appreciate the feedback related to reviewing the PSR more widely taking an outcomes based approach. RECCo are separately improving the approach to priority services as part of their Forward Work Plan, taking an outcomes approach. Our work supports but does not replace this. The Performance Assurance activity will focus on the PSR as it currently operates. We appreciate that some Parties would prefer the work of the Performance Assurance team to go beyond this, whilst the majority of Parties keen for activity to remain within the boundaries of the REC. On the change process feedback, the Code Manager's role within the REC Change Process will be picked up as part of the change management review.

7. From your perspective, what critical success factors should the PAB use to prioritise its activity?
Summary: Four responses suggested critical success factors, including a suggestion from a DNO to track Party data submission and the achievement of 100% with submissions. A Supplier suggested value to customers and market conditions, and a MEM suggested measuring the value of underperformance within the market so this could be shared with market participants. A Service Provider suggested looking at outcomes related to the change process, rather than focusing on one area of the process (e.g. only looking at the time elapsed for DCC). **Code Manager response:** The approach to Party data submissions is a decision that would need to be taken to the PAB, prior to any activity being added to the PAOP. This will be taken to the November meeting for discussion. We think that it is a great suggestion to look at the value of underperformance, and that more work is needed to research into the impact and cost of this in the market. We will propose that this is included as part of RECCo's forward work plan We can confirm that we will be taking an outcomes-focused approach when looking at the change management process.

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APPENDIX A

The following pages show the specific responses the Code Manager received from Parties as well as the Code Manager's response to each point raised.

QUESTION	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
1. What changes, if any, would you suggest to the proposed focus areas and indicative activities for Year 2, as set out in the PAOP?	ScottishPower Energy Retail Energy Supplier	We have not had time to fully review this change and would be happy to have a bilateral call if required. We have provided some initial thoughts. We would want REC PAB to focus directly on areas directly linked to the REC and not prioritise areas outside the gift of the REC to investigate.	We agree and can confirm that the focus of the REC PAB will be within the vires of the REC, however we are keen to understand whether, particularly relating to switching and metering, the Code is delivering good consumer outcomes.
	ScottishPower Energy Networks DNO	We would not suggest any changes at this point	
	Northern Gas Networks GT	General Response: NGN supports the intent of the Performance Assurance Board to facilitate improvements to the quality of data shared between industry parties for vulnerable and priority consumers under the Priority Services Register (PSR). We would like further clarity around Gas Transporters being required to self-report in relation to PSR data. While we support that a self-assessment is more appropriate than an audit we have concerns that in the PAOP this seems to be categorising Gas Transporters and DNOs as having the same requirement in relation to this self-reporting. Gas Transporters obligations under REC relate to our only accessing data (held in a secure repository by the CDSP) under specific use case circumstances via the Xoserve Broadcast/Extract Service provided for in Schedule 13, paragraph 5.8. Whereas DNOs themselves hold and maintain the PSR register, and therefore have more complex and overarching access to, and responsibility for, the data within REC.	We welcome the support for the focus on the PSR. Further information on how the self-reporting for DNOs and GTs will be clearly set out early in the New Year, ahead of the self-assessments taking place in March.

		We would like to work with PAB to ensure that any questions within a self-audit for Gas Transporters are appropriate and fair, in view of our limited obligations under REC Schedule 13, and our overarching licence principle that we do not retain this data.	
	IMServ Europe Metering Equipment Manager	1) Overall prioritisation forecast. - If not already considered and justified, thought could be given as to how much effort is allocated to Entry processes and any prioritisation of work within this to differentiate between parties wishing to enter the market and offer services and those parties who already exist and simply desire access to Master Enquiry Services. The benefit to the market of each of these two different types of Entry Requests is vastly different. - It would also be beneficial to understand whether any effort has been allocated to support the MHHS Programme, and if not, is this a genuine omission?	Our process focuses on whether an applicant has access to REC Services, we do not currently track if an applicant already operates in the market in non-REC User roles, although applicants to become Parties are inherently new to the market. Some types of users, particularly TPIs and TPISs applying to use the data already exist, but are developing new business models and services to provide predominantly to Parties. We are working with the MHHS programme to understand the impact on our services. This will involve adjustments to our entry process / documentation, maintenance of qualification, metering assurance and Party assurance data collection. Some of this will commence in the coming year and extend into future years too. As this is spread throughout our service we have not called it out separately, but instead included it as part of the continuous improvement in each area.
	Utilita Energy Limited Energy Supplier	When the Performance Assurance team is working on party performance, it needs to be clear to the parties involved what exactly Performance Assurance teams are looking to achieve through improved reporting. The reporting dashboard has been promised for a long time, yet there is still no evidence of this being made available to REC Parties	We support that performance assurance activity needs to be clear and transparent, and agree that the implementation of the Performance Assurance dashboards will be a critical part of this. The engagement sessions with industry will be taking place in November

		anytime soon. Working with the Performance Assurance team over the past year it has often felt as though there is no clear direction, the focus is chaotic and activities are poorly planned. This has led to unnecessary miscommunication. Over the last year, some time has been spent looking into issues around the DAP and PSRs (for DNOs and GTs) but this mustn't hinder or distract the wider work that is going on in the industry such as change proposals and RECCo's forward plans. The Performance Assurance team needs to find a way to work alongside the Code Manager and the industry to influence more impactful changes.	2022, please look out for further information on the weekly news bulletin and through communications directly to Parties. We also take on board the feedback related to better integration between Performance Assurance and Change, and it is part of our operating plan to focus on this integration.
	DCC Service Provider	Within Section 2.2 'Feed performance data into the Codes roadmap for Change Proposals to be developed' – it would be helpful to understand the specific areas of focus, for example, time v. quality performance measures can drive very different behaviours. • Can it be specified which months of the year the Performance Assurance Year 2 consists of for clarity? Is it from October'22 – September'23 as shown in Section 2.5 Indicative Timeline?	Section 2.2 refers to feeding in risk monitoring outputs into the REC Codes Roadmap in order to drive code improvement. This does not relate to measures around the Change Proposals themselves looking at time or quality. We can confirm Year 2 is from 1 September 2022 to 31 August 2023.
	National Grid Electricity Distribution DNO	We agree with the planned approach to the focus areas and indicative activities for year 2.	
2. Current Market Conditions – What changes, if any would you suggest to the planned activity related to Current Market Conditions (pg.7)?	ScottishPower Energy Retail Energy Supplier	No comment.	
	ScottishPower Energy Networks DNO	We are supporting of the cognisance of market conditions and the impact that it may have on parties. We are supportive of the DNO self-reporting in the PSR area and would appreciate visibility of the format that this will take going forward. We note that there was a	We welcome the support for the focus on the PSR. Further information on how the self-reporting for DNOs and GTs will be clearly set out early in the New Year. We have taken

		delay in the update back to DNO's following the 1-2-1 sessions, we would hope for a reasonable timescale to be clarified for acceptance/follow up in this area moving forward. We are also keen for more information on the future work referenced in this area to allow for appropriate resource planning if DNO involvement is specifically required.	on board the feedback regarding feedback to DNOs and will make sure this is addressed going forward.
	IMServ Europe Metering Equipment Manager	Data Submission Review: This needs to include a topic mentioned later in the paper regarding the availability of MEM DTN data (page 10). The current practices of MEMs regarding the use of the DTN predate the REC and are typically the result of cost considerations by individual parties and would have direct commercial and ensuing competition impact. Any initiative to propose a change to this must therefore be undertaken in an open and collective manner and include robust cost v. benefit analysis to justify any proposal. The findings and feedback from all participants should be available to all for review.	As noted in the PAOP the status quo of using MEM DTN data is not allowing the current approach of performance assurance to operate effectively. We are keen to engage and collaborate with Parties to find the most pragmatic and appropriate solution. We've already started some of this, for example by using routes such as the Metering Expert Panel (MEP) which we will use as a basis for further engagement.
	Utilita Energy Limited Energy Supplier	Below are thoughts on improving some plans mentioned in the Current Market Conditions section mentioned on page 7 as well as some of our ideas that relate to the current market plans that should be considered; - Better monitoring of where Energy Consumers are changing habits on an industry scale e.g. where gas meters are being removed, more electric technology is being installed or Energy Consumers switching to PPM. This analysis would allow the Retail Energy Markets to understand current and future trends in time to adapt to any necessary industry changes. - Debt Management changes are key to helping the most vulnerable customer therefore the Performance Assurance	Thank you for the suggestions related to Current Market Condition activity. We agree on monitoring industry trends, but would need to do this within the boundaries of how this affects the REC. We are currently working with the REC Change team on R0037 and will continue to do so. On Prepayment meters we are updating our risk assessment so that it focuses on the most relevant areas within the vires of the REC. When doing so we will consider legacy

		team should work closely with already existing changes such as R0037 to find impactful solutions as swiftly as possible for Energy Consumers. - Focus more on how to remove the market barriers for PPM (Prepayment) Customers. Making sure PPM customers have similar services (to credit customers) or improved access to technologies, and support during any catastrophic changes in the market (as a result of financial and environmental impacts). As mentioned on page 8 the Performance Assurance team plan to review Legacy PPM processes, these solutions must be delivered quickly and at a low cost to have value to the Energy Consumer. The smart meter roll-out is due to end in 2024, therefore there is only one year to deliver a change proposal that could be impactful to PPM customers. If Legacy PPM changes can't be delivered during this time, the Performance Assurance team should then start thinking about the withdrawal process for Legacy PPM and how to work on improving any smart PPM solutions and access.	infrastructure, we agree that legacy meter activity will reduce and therefore any future areas of focus will need to be agreed with the PAB.
	DCC Service Provider	No comment.	
	National Grid Electricity Distribution DNO	We agree with the planned approach for Current Market conditions, however we believe it should read: *'While <u>we</u> expect many of the market trends'* and *'however it is important ~~that~~ <u>to</u> understand their impacts on the REC arrangements'*	Thank you for the support on the planned approach, and we will pick up the wording correction.
3. Communications - What information would you find useful to receive on a regular basis on	ScottishPower Energy Retail Energy Supplier	REC PAB need to be open and honest about how they calculate performance for REC parties to enable them to replicate reporting for their own KPIs and EWIs.	We agree there needs to be transparency with how performance is measured, and the performance dashboards will be a critical part of giving Parties visibility of their own performance.

Performance Assurance activities?	ScottishPower Energy Networks DNO	We believe that the intention to provide a quarterly summary would be beneficial to parties in enabling a view of a longer period (as there can be fluctuations month on month) this will allow a high-level view of the areas being monitored. We have not identified any additional areas. Dashboards will be beneficial moving forward and allows parties to see what the PAB see. We have a query around this: If a party has been identified as failing during a reporting period, and it transpires that there was an error in the source data provided to the PAB by another party – will this be reflected in the dashboard when this has been confirmed to update the scoring retrospectively?	We welcome the support for the quarterly planned engagement sessions, and as stated in previous responses we agree that performance dashboards will be critical to give Parties visibility of their own performance. In response to the point on errors in source data, our approach is to use data to identify risks or potential issues, however in many cases data is used as an indicator for further follow up activity rather than identifying failings. Where we identify data is incorrect or the way data is measured needs to be updated, this will be corrected retrospectively, where feasible and subject to a reasonable timescale. As part of normal practice the last three months of assurance data is routinely updated.
	IMServ Europe Metering Equipment Manager	Communications is an area which, definitely needs to be improved as currently, there is minimal information available at either a general or individual participant level. Is there an opportunity to share lessons learned or observations arrived at by the PAB in a confidential manner, which contains sufficient detail to explain the issue and to alert participants to a potential need for them to review their own processes? We welcome the launch of the dashboards but simultaneously have some concerns and questions: 1) Has market research been completed in order to ascertain that the technology is suitable (especially in consideration of	We appreciate the feedback for how communications can be improved going forward. We currently utilise the main Code Manager communication channels, through the weekly bulletin update as well as more targeted communications where necessary. In terms of visibility of PAB discussion, there have recently been changes to the process of publishing Committee draft minutes which may help with this. Instead of draft minutes being published to Committee members only, from November onwards we will be

		EMAR feedback) and also that the information being reported is useful (in terms of content and timeliness) for the receiving party? 2) Will the individual party's dashboard contain some peer comparison data? Will this be anonymised? 3) Who will have access to the dashboard data. i.e. only the participant or the whole market? 4) The Indicative Timeline (2.5) notes webinars to commence in October – is this correct? With regard to the Change Process, we would welcome and encourage inclusion within CPs of the consideration of risk: whether this be that the CP will mitigate existing risk or, as is sometimes the case, may even introduce some risk	publishing the draft minutes a week after the meeting, which will give more context to decisions and discussion items being raised at the meeting. To respond to some of the specific questions raised: 1. The underpinning technology used on the dashboards is Power BI which is a standard platform for producing dashboards of this type. The information that will be included in the dashboards is the information currently produced by the Performance Assurance team, with the dashboards making this visible to Parties so they are able to monitor their own performance. We anticipate as a wider range of users use the dashboards we'll gather feedback and make changes to dashboards as part of continuous improvement. 2. Certain dashboards will include peer comparison data and in the initial releases we will not change the current anonymisation. 3. Participants will be able to see their own data, and as per the response to question two there will be some peer comparison that is already produced (e.g. Erroneous Switch peer comparison). PAB Members and the

			Code Manager will continue to have visibility of all Parties, which is unchanged from the current status. 4. The indicative timeline notes that webinars would be delivered in line with the implementation timeline, which will be throughout November 2022 (and the PAOP will therefore be updated to reflect this).
	Utilita Energy Limited Energy Supplier	There has been a lack of regular, accurate, and beneficial dialogue between Market Participants and the Performance Assurance team, therefore improving in the following areas could be beneficial: - We previously experienced a data breach and pushed for more information from the Performance Assurance team. The response was slow. An extra initiative from the Performance Assurance team to update involved stakeholders was lacking, therefore further improvements are needed in this area. - Conversations on the ICO assessment have been lacking. There are no helpful dialogues across all stakeholders to best manage all concerns. - Communicate data with REC Parties through a dashboard. This will make it easier to understand the purpose of RFIs or commentary from the Performance Assurance team. - Better cohesion with other REC Service Providers, to improve webinars/workshops on topics that overlap with other Service Providers (e.g. DAP Workshop) and the sharing of accurate information with Market Participants (e.g. News Bulletin can have inaccurate information) - Making sure that data shared with Market Participants have been verified and accurate e.g. TRAS report 2021/2022	We appreciate the feedback on the communications approach. Our intention is always to share information that is accurate and make sure we do this in a timely manner. For the specific examples mentioned we have picked these up with the respondent. We are aware that there is still an outstanding query with the ICO, and we have been working with RECCo to progress and resolve this. In the absence of an update from ICO and an understanding of next steps, we continue to progress with our party data submission approach, to enable our assurance to be dynamic and data-led. We agree that data will be communicated through dashboards going forwards. There will also be a series of engagement activity related to dashboards which will take place in November, to make sure Parties have the relevant information on how to use the data.

			On potential overlap, we will continue to work closely with other REC Service Providers to avoid this and make sure webinar topics and delivery are aligned.
	DCC Service Provider	The DCC team that manages Major Changes currently have very little interaction with the RPA team. We acknowledge however that the RPA do interact with the Operational Change Team. To differentiate between the two Change Processes it might be useful to specify which part of the 'Change Process' is being referred to. It would also be useful to understand whether the assurance process is targeted at the initial stage of raising a Change Proposal or assuring change delivery into test and/or production environments. • Point 1 of 'The Change Process' – there is a risk that the current drafting could impact on a DCC Service Provider's willingness to drive continuous improvement if they feel that a continuous improvement initiative could be re-badged as an issue. Can we also clarify who will be carrying out this reporting to the PAB? • Point 2 of 'The Change Process' - can we clarify who will be carrying out this review? • Point 3 of 'The Change Process' - can we clarify who will be carrying out this review?	We can confirm that the Change Process referenced in the PAOP is the REC Change Management Process, not the Major Changes. The REC Code Manager will undertake this improvement work, and we do not believe that it will impact DCC's Service Providers. The Performance Assurance team are responsible for reporting to the PAB.
4. Direct Assessments – What changes, if any, would you suggest to our planned activity on direct assessments (pg. 15)?	ScottishPower Energy Retail Energy Supplier	Some of the areas suggested are monitored elsewhere and concerned about duplication of effort. These are challenging times and want to ensure that resource is applied efficiently and not diverted from key customer areas.	We appreciate this concern and have reviewed potential duplication of effort with UNC and BSC, and agreed information sharing approaches to try to minimise this. On our activity on the PSR, we have engaged with Ofgem to avoid potential overlap. If there are other areas of potential overlap we would welcome Parties contacting us on these, as overlap is something we work to actively avoid.

	ScottishPower Energy Networks Service Provider	We welcome the proposal for DNO to self-assess in relation to the PSR process and look forward to the criteria that will be required and the template for submission being issued in due course. There is reference to the forward-looking plan reviewing this area and creating a project, it would be useful if information on this could be shared. We welcome direct assessment against the Switching Provider as this is the key area for monitoring switching and as such may identify future enhancements/performance areas for review.	As referenced in previous responses, we welcome the support for the focus on the PSR. Further information on how the self-reporting for DNOs and GTs will be clearly set out in the New Year. We have taken on board the feedback regarding feedback to DNOs and will make sure this is addressed going forwards.
	IMServ Europe Metering Equipment Manager	None	
	Utilita Energy Limited Energy Supplier	No further comments.	

	DCC Service Provider	Within section 2.5 it shows 'Improvement activities related to Change Management' – it would be useful to include what the activities are, when they will be and any crunch points. 'Reporting on Change Process improvement and integration to PAB' – We presume this is monthly reporting by the blocks shown but are unclear if this is referring to Major Changes (REC CPs) or Operational Changes? Can it be clarified who is in charge of performing this activity also? Within section 3 and 'Performance Charges' we note that the progression of R0025 is not wholly in DCC's control. DCC can respond to Impact Assessments within the provided timeframes however we have no control of how long it might take the Code Manager to carry out any legal reviews, for example. Has any consideration been made on levying performance charges on the Code Managers and their responses to REC CPs?	The improvement activities will be based on lessons learned to date and the outcomes of the review of the change management process. We can confirm that change management activities related to REC Change Proposals, rather than Operational Changes. The Performance Assurance team leads this activity in line with contractual arrangements to review the Change Management process. On Performance Charges for the Code Manager, as RECCo already has a contract in place with these Service Providers there are already contractual arrangements in place to incentivise performance. The Performance Assurance team within the Code Manager does not set Code Manager performance incentives, as these are set and managed by RECCo.
	National Grid Electricity Distribution DNO	We currently have no comments to this.	
5. Service Provider Assurance – What changes, if any, would you suggest to the prioritisation of the assurance	ScottishPower Energy Retail Energy Supplier	No comment.	
	ScottishPower Energy Networks	We have identified no issues in the prioritisation of the Central Service Providers.	

	over Central Service Providers (pg. 16)?	DNO		
		IMServ Europe Metering Equipment Manager	None however there are two questions: 1) Where and how is the performance output provided? 2) Is it within REC's remit to apply performance assurance techniques to the electricity DTN Provider?	The performance output on Service Providers is shared with the PAB and RECCo, through regular monthly updates. It is not within the scope of the REC to provide assurance over the DTN. We are however made aware of issues with the DTN, and the impacts this may have on Party performance.
		Utilita Energy Limited Energy Supplier	No further comments.	
		DCC Service Provider	Within section 4 it states that there will be Performance Assurance of REC Code Manager Providers – in this case will be the RPA be assessing themselves?	RECCo is responsible for assessing the performance of the Performance Assurance team; the Performance Assurance team does not perform assurance on its own activities, as this would create a conflict of interest.
		National Grid Electricity Distribution DNO	We agree with the current prioritisation, however we would consider that ETTOS may require a greater focus given the current market conditions which may lead to more energy theft.	We think the current prioritisation is proportionate and have therefore not updated the PAOP, however this can be reviewed at a future point if market conditions indicate further assurance is required on ETTOS.
6.	What areas of activity, if any, do you feel should be prioritised that are not currently outlined in the PAOP? What	ScottishPower Energy Retail Energy Supplier	We think REC PAB should focus on Unallocated Transactions. There have been no reports since MRA meaning a lack of visibility of the volume outstanding. Suppliers could be chasing customers for debts that have already been paid. It is important to implement a process that can be monitored centrally e.g., SDEP, for this activity. The monitoring should include updates via D0312 to allow the data to be cleared.	Unallocated Transactions is something that the wider Code Manager Technical Services team is working on, and we are considering if this should be included as part of our prepayment risk review.

activity would you de-prioritise as a result of this new activity?	ScottishPower Energy Networks DNO	None identified	
	IMServ Europe Metering Equipment Manager	Not possible to answer without seeing the performance figures relating to all risks to which the PAF is privy.	
	Utilita Energy Limited Energy Supplier	Prioritise better reporting/dashboard so that Market Participants can understand what the Performance Assurance team is seeing. Prioritising the PSR could be beneficial if solutions looked to be more outcome focused. If PSR could be reviewed to become more of an outcome focus register this will allow the industry to highlight the precise information and needs to help Energy Consumers who have a disadvantage.	As indicated in previous responses, the Performance Assurance Dashboards are being implemented shortly and will give greater clarity to market participants. We appreciate the feedback related to reviewing the PSR more widely. This would be a more strategic approach and is something that RECCo have included as part of their forward work plan. The Performance Assurance activity will focus on the PSR as it currently operates. We appreciate that some Parties would prefer the work of the Performance Assurance team to go beyond this, whilst the majority of Parties are keen for activity to remain within the boundaries of the REC.
	DCC Service Provider	The REC Code Manager themselves and their readiness, especially when it comes to technical expertise, to identify impacts correctly and to assure cross code impacts have not been missed should be prioritised.	The Code Manager role within the REC Change Process will be picked up as part of the change management review.
	National Grid Electricity Distribution	We currently have no comments to this.	

	DNO		
7. From your perspective, what critical success factors should the PAB use to prioritise its activity?	ScottishPower Energy Retail Energy Supplier	Not sure we understand the question but happy to have an offline discussion.	
	ScottishPower Energy Networks DNO	We believe that the tracking of Parties submission % of required reports, with a view to getting to the 100% mark should feature in the critical success factors. We do not see this explicitly referenced in the forward-looking documentation.	The approach to Party data submissions is a decision that would need to be taken to the PAB, prior to any activity being added to the PAOP. This will be taken to the November meeting for discussion.
	IMServ Europe Metering Equipment Manager	To enable participants to understand the impact of their underperformance on other market participants and to enable them to understand what is achievable by others (which may be more or less than industry rules prescribe).	We think that this is a great suggestion, and think that more work is needed to research into the impact and cost of underperformance in the market. This could involve a survey of consumers to seek their view of problems, and would help to better understand and make decisions on trade offs between future activities. We will propose that this is included as part of RECCo's future work plan.
	Utilita Energy Limited Energy Supplier	Activities should be prioritised by assessing if there is - Value for Energy Consumers and, - Current/future market trends worth taking into consideration. This could help sharpen the market to be more reactive to future market changes and allow enough time to prepare for these changes.	We agree that value for energy consumers is important, and refer to the answer above in terms of how this is taken forward.
	DCC Service Provider	Outcomes – we would recommend that, rather than assuming a specific part of a process drives a certain outcome, that the PAB start with the outcome then work backwards through the process. For example, within the REC Change Proposal process there is a lot of	We can confirm we will be taking an outcomes focused approach when looking at the change management process.

		focus on DCC whereas a significant portion of the elapsed time is with the REC Code Managers, not DCC.	
	National Grid Electricity Distribution DNO	N/A	