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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0122 SDEP REVIEW IMPROVEMENTS (2) - USABILITY

On 21 August 2026 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0122.

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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DATE ISSUED	23 September 2026
RESPONSIBLE COMMITTEE	Technical Expert Panel
LEAD ANALYST	Holly Law

DATE CONSULTATION ISSUED	31 July 2026
RESPONSE DEADLINE	21 August 2026

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Question 1:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Octopus Energy (Energy Supplier)	Overall we agree with the new proposed legal text and look forward to seeing these improvements in action. We have one observation on p.13 Whilst we welcome the introduction of a functionality on SDEP to indicate the time lapsed when a communication is within the escalation process to identify it can move to the next level. If an agent responds after 3 days to say they need to contact a customer for example. At 5 days is the other supplier still expected to chase as a matter of course as it has reached 5 days or does the clock start again when a response is received. If you are expected to chase this when the other supplier has already responded but it hasn't been resolved it could leave to unnecessary work and looking at accounts twice. Are you also expected to always chase?	The SLA indicator is intended to provide visibility of when an escalation becomes available rather than create an obligation to escalate. The functionality being introduced to SDEP will show the time elapsed whilst a communication is within the escalation process and indicate when it is eligible to move to the next escalation level. Where a party has responded and is actively progressing the query, there is no requirement to automatically chase or escalate simply because 5 working days have elapsed. The escalation processes set out in Schedule 30 remain unchanged.
National Grid Electricity Distribution (Distribution Network Operator)	n/a	n/a

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Centrica (Energy Supplier)	Position: British Gas has no material comments on the proposed legal text. British Gas has reviewed the proposed legal drafting at a high level and has not identified any material concerns from a REC governance or operational perspective. British Gas has not undertaken a formal legal review of the drafting and our response should not be interpreted as legal approval of the proposed text. Recommendation: No changes to the legal text are proposed at this stage.	Thank you for your comment.
SSE Energy Supply Limited (Energy Supplier)	SSE is satisfied that the Legal Text reflects the requirements as documented within the R0122 solution design.	Thank you for your comment.
SP Energy Networks (Distribution Network Operator)	N/A	N/A

Question 2:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Octopus Energy (Energy Supplier)	Our only observation would be that the implementation date have moved again to 25/6/2027. Is there any confirmation that it will not be moved again?	Based on the planned milestones for Final determination and subject to Design, Build and Test timelines, the June 2027 Release is

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	We would also envisage a bedding in period whilst everyone gets used to the new way of working post implementation.	the next appropriate release window that allows for migration information, guidance, updated FAQ's/ User Guides to be available sufficiently in advance of implementation. Noted.
National Grid Electricity Distribution (Distribution Network Operator)	n/a	n/a
Centrica (Energy Supplier)	Position: British Gas supports R0122 and the implementation of the proposed SDEP usability improvements. The proposal addresses several areas that users have identified as opportunities for improvement, including reporting, search and filtering functionality, notifications, workflow management and automation. British Gas considers these changes should improve the usability and efficiency of SDEP. Key issue British Gas would welcome further clarification on automatic owner assignment before implementation. While British Gas supports automation in principle, it is important that parties clearly understand: • how automatic owner assignment will operate in practice; • how ownership can be managed where responsibility sits with a team rather than an individual user; and	Thank you for your support of R0122. We note your comments regarding automatic owner assignment and agree that it will be important for users to understand how functionality will operate, including how ownership can be managed, reassigned and maintained where responsibility sits with a team rather than an individual user. Automatic owner assignment is a new optional feature and will not be enabled by default at implementation. Instead, each organisation's MAU will be able to decide whether to enable and use the functionality based on its own operational arrangements. Full details of how the feature works will be provided within the SDEP User Guide, alongside supporting guidance, training

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	• how ownership can be reassigned where an assigned user is unavailable. This clarification is important because clear ownership arrangements will help ensure communications and queries continue to be managed effectively. Additional observation British Gas considers the SDEP escalation process may warrant further review as part of future development activity. Whilst this observation does not affect our support for the proposal, we encourage the Code Manager to consider whether additional enhancements to escalation processes could be explored through future SDEP improvements. Recommendation British Gas supports implementation of R0122. British Gas recommends that implementation guidance includes clear information on automatic owner assignment and ownership management processes.	materials and webinars made available ahead of implementation. We also note your observation regarding the SDEP escalation process. Whilst this is outside the scope of R0122, the suggestion will be considered as part of any future review of SDEP functionality and potential usability enhancements. The recommendation regarding clear implementation guidance has been noted.
SSE Energy Supply Limited (Energy Supplier)	We have some further comments and points for clarification regarding the proposed changes: We would welcome visibility of the timeline for updates to the FAQs and the SDEP User Guide. In addition, we would strongly support the provision of further webinars and training sessions ahead of the implementation date to help users understand and prepare for the changes.	Thank you for your comments. We note the request for visibility of updates to the FAQs and SDEP User Guide, as well as the suggestion for additional webinars and training sessions ahead of implementation. The Code Manager intends to provide the migration plan, updated User Guide, supporting guidance and FAQs three months

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	Whilst we note that a migration plan will be issued separately, it would be helpful to understand how the proposed 12-month retention period will be applied. Specifically, will communications that already exceed 12 months at the point of implementation be retrospectively archived, or will the 12-month period apply prospectively from the go-live date? We would also like clarification on whether further enhancements will be made should issues be identified with the accuracy of the reporting data. We continue to experience concerns regarding the reliability of some existing SDEP reporting outputs and are keen to understand whether the new reporting functionality will address current reconciliation issues. We would, therefore, welcome confirmation of how reporting accuracy will be validated within the new solution and how any identified discrepancies will be investigated and resolved	minimum prior to implementation. Training sessions and webinars will also be provided to support implementation readiness. We also note the request for clarification regarding the application of the proposed 12-month archiving functionality to existing communications. Further detail will be provided within the migration plan, including how the requirement will apply to the existing SDEP estate and the treatment of pre-existing communications following implementation. With regard to reporting functionality, we note the concerns raised regarding reporting accuracy and reconciliation. R0122 does not propose changes to existing reporting features; instead it introduces a new standard report and a RAW data export capability to enhance users' ability to analyse communications data. As the specific reporting and reconciliation issues referenced have not been detailed, the Code Manager would welcome further information to better understand these concerns. Any issues identified following implementation will be recorded and may be considered as part of future SDEP reviews and enhancements.

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SP Energy Networks (Distribution Network Operator)	N/A	N/A

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