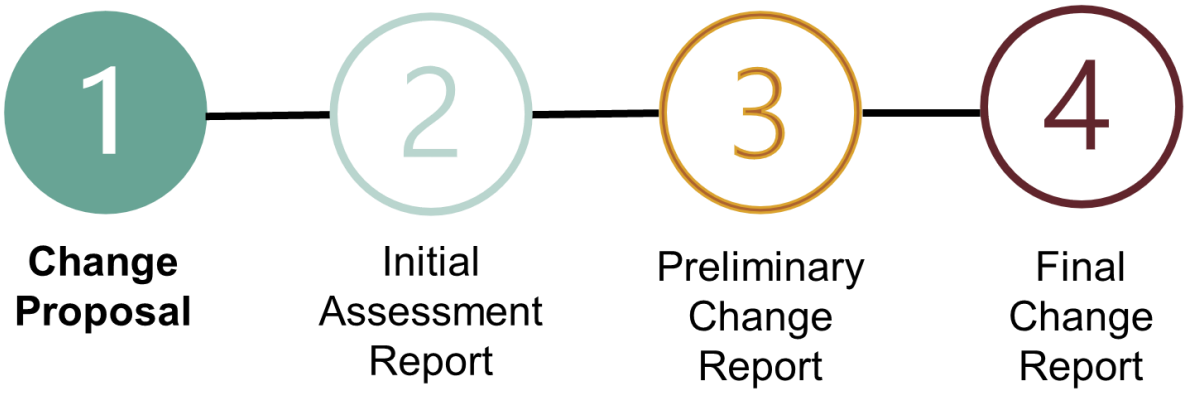
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Information is for public, unrestricted dissemination and publication.

CHANGE PROPOSAL FORM (COPY)

PLEASE NOTE: THIS IS A COPY FOR INFORMATION ONLY. TO SUBMIT A CHANGE PROPOSAL PLEASE USE THE ONLINE FORM ON THE REC PORTAL.



PURPOSE:	This is a copy of the Change Proposal Form submitted by the Proposer on the REC Portal.
NOTES:	The information in this form is subjective to the views of the Proposer at the time of submitting the form, and prior to formal assessment by the Code Manager. The solution will not be finalised until the publication of the Preliminary Change Report.
NEXT STEPS:	The Code Manager will complete an initial assessment of the Change Proposal and determine if additional development or assessments is required. The Initial Assessment Report will be published with the Change Proposal Plan and reviewed by the Change Panel.

RETAIL ENERGY CODE

1 PERSONAL DETAILS

PROPOSER NAME *(Mandatory)*	Cristina Bermudez Alvarez
COMPANY *(Optional)*	Deloitte LLP
COMPANY TYPE *(Optional)*	
TELEPHONE NUMBER *(Optional)*	
EMAIL ADDRESS *(Mandatory)*	cbermudezalvarez@deloitte.co.uk

2 CHANGE PROPOSAL SUMMARY

CHANGE PROPOSAL TITLE *(Mandatory)*	Maintenance of Qualification Change
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	Clarification and simplification around different areas within Schedule 9 - Qualification and Maintenance. 1. Proposed change: Renaming of Entry documentation for simplification: **a.** From "Systems or Process Change Disclosure" to "Change or Incident Notification" **b.** From "Service User Categorisation and Assessment" to "REC Service User Assessment Guidance" 2. Proposed change: Obligation 2.3 currently describes as a pre-condition to Qualification that Energy Suppliers have to demonstrate that they are a "Smart Energy Code User" (if required by the Energy Supplier's Energy Supply License). This should be reworded to "Smart Energy Code Party" for consistency with the SEC. 3. Proposed addition: Obligation 2.4 and obligation 2.6 currently does not specify what is meant by 'interface with other Market Participants'. An update should specify that this refers to: i. A change to the method of interfaces (e.g the use of an alternative mechanism to DTN) ii. A change to the system used in the sending and receipt of flows over DTN

	iii. A different situation such as a change of ownership 4. Proposed change: Obligation 3.5 currently refers to says to 'Energy Suppliers or Distribution Network Operators' this should be reworded to 'All REC Parties' in order to clarify that all REC Parties including MEMs, requesting Qualification for a sector of the market that is has not previously been Qualified, must complete the full Entry Assessment process detailed in the REC Schedule. 5. Proposed change: Obligation 3.7 (b) currently refers to 'Energy Suppliers and Distribution Network Operators' this should be reworded to 'All REC Parties' in order to clarify that all REC Parties including MEMs, may be subject to Controlled Market Entry Conditions where they have become Qualified. This should also be reflected in obligation 9.7 and 9.9. 6. Proposed addition: Introduction of a new obligation between current obligation 9.9 and 9.10 which states "As a pre-condition to Controlled Market Entry Conditions (CMEC) Exit, all REC Parties should become a DCC Users (if required by its Energy Licence). 7. Proposed change: Obligation 10.2 describes that 'All REC Service Users are obliged to promptly report any relevant and significant security incidents that affect or have affected their Systems to the Code Manager.' The method of this communication should be reflected in the obligation as follows 'All REC Service Users are obliged to promptly report any relevant and significant security incidents that affect or have affected their Systems to the Code Manager via the REC Service Desk' 8. Proposed change: Obligation 11.5 and 11.6 currently refer to 'Energy Suppliers and Distribution Network Operators' this should be reworded to 'All REC Parties' in order to clarify that all REC Parties including MEMs, need to complete the current systems and process change disclosures. 9. Proposed change: Obligation 13.1 describes that 'The REC Service User External Assessment will include the submission of the following information in respect of the REC Service User (known as the REC Service User Assurance Evidence)'. This

	should be reworded to 'The REC Service User External Assessment must include the submission of the following information in respect of the REC Service User (known as the REC Service User Assurance Evidence)'. This is in order to increase the enforcement of this obligation as the current words don't stress the requirement enough. 10. Proposed addition: Obligation 13.1 details the required evidence to be submitted as part of the REC Service User External Assessment. Inclusion of requirement 13.1 (f) to describe 'Some REC Service Users may be required to submit a letter of sponsorship (which should be resubmitted annually) to confirm that a commercial relationship exists or will exist in the next 12 months between a REC Party and the REC Service User'.
WHAT IMPACT IS THIS HAVING? *(Mandatory)*	This change will clarify, strengthen and simplify a number of requirements within REC Schedule 9 – Qualification and Maintenance. Currently there are a number of issues where Parties are not entirely sure as to what their requirements are with regards to Schedule 9. As such, we are lacking submissions for M&Q or spend a considerable high amount of time emailing different Parties or having calls with them, with regards to their individual submissions as these are not clear within the REC Schedule. The Code Manager also is experiencing some pushback with regards to submissions as Parties refer to the Schedule 9, where the requirements for them to complete some submissions is not detailed or clear enough.
WHAT OUTCOMES DO YOU CONSIDER ARE NEEDED TO ACHIEVE AN EFFECTIVE SOLUTION? *(Mandatory)*	The update of the REC Schedule 9 – Qualification and Maintenance.
IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE CHANGE PROPOSAL THAT WOULD BE USEFUL? *(Optional)*	N/A

RETAIL ENERGY CODE

3 CONSUMER IMPACTS

WHICH CONSUMER TYPES WILL BE IMPACTED BY THIS CHANGE PROPOSAL? *(Mandatory)*	☐ Electricity ☐ Gas ☐ Domestic Prepayment ☐ Domestic Credit ☐ Microbusiness ☐ Small and Medium Enterprise (SME) ☐ Industrial and Commercial (I&C) ☐ Other (please specify in the Additional information box below)
WHAT IMPACT WILL THIS CHANGE PROPOSAL HAVE FOR THESE CONSUMERS? *(Mandatory)*	☐ Switching experience ☐ Billing accuracy ☐ Trust and confidence ☐ Safety ☐ Security of supply ☐ Ability to pay ☐ On site experience ☒ Other (please provide details in the Additional information box below)
ADDITIONAL INFORMATION *(Optional)*	No impact on consumers, only on REC Parties. Some of these updates will enforce obligations over additional Parties making sure processes are being assured accordingly, and make it easier for Parties to understand their obligations through simpler terminology and more consistent application of assurance processes..

4 CODE IMPACTS

Does this Issue relate to or impact:

THE REC OR REC SCHEDULES? *(Optional)*	☐ Main Body ☐ Interpretations and Definitions Schedule ☐ Transition Schedule ☐ Accession Agreement ☐ Company Governance Schedule ☐ Change Management Schedule ☐ Performance Assurance Schedule ☒ Qualification and Maintenance Schedule

	☐ Market Exit Schedule ☐ Charging Methodology Schedule ☐ Prepayment Arrangements Schedule ☐ Central Switching Service Schedule ☐ Data Access Schedule ☐ Energy Theft Reduction Schedule ☐ Transfer of Consumer Data Schedule ☐ Metering Operations Schedule ☐ Metering Accreditation Schedule ☐ Smart Meter Installation Schedule ☐ Secure Data Exchange Schedule ☐ Green Deal Arrangements Schedule ☐ Registration Services Schedule ☐ Related Metering Points Schedule ☐ Address Management Schedule ☐ Switching Data Management Schedule ☐ RMP Lifecycle Schedule ☐ Switching Service Management Schedule ☐ Resolution of Consumer Facing Switching and Billing Issues Schedule ☐ SPAA Transition Schedule ☐ MRA Transition Schedule ☐ Unbilled Energy Code of Practice ☐ Gas Metering Code of Practice ☐ MOCoPA ☐ ASPCoP ☐ Change Panel Terms of Reference ☐ Performance Assurance Board Terms of Reference
ADDITIONAL INFORMATION *(Optional)*	

THE DATA SPECIFICATION? *(Optional)*	☐ Data Item Catalogue ☐ Market Message Catalogue ☐ Data Access Matrix ☐ Standards Definition

ADDITIONAL INFORMATION *(Optional)*	

CENTRAL SYSTEMS OR REC SERVICES? *(Optional)*	☐ Electricity Enquiry Service ☐ Central Data Service Provider Further Services ☐ Secure Data Exchange Service ☐ Green Deal Central Charging Database ☐ Central Switching Service (CSS) ☐ CSS Certificate Authority ☐ Switching Operator ☐ Gas Retail Data Service ☐ Electricity Retail Data Service ☐ Gas Enquiry Service ☐ Energy Theft Tip Off Service (ETTOS)
ADDITIONAL INFORMATION *(Optional)*	

REC PARTIES AND/OR MARKET PARTICIPANTS? *(Optional)*	☒ Energy Suppliers ☒ Distribution Network Operators ☒ Gas Transporters ☒ Metering Equipment Managers ☐ DCC ☐ Shippers ☐ Data Collectors ☐ Data Aggregators ☐ Green Deal Providers ☐ Green Deal Finance Parties ☐ Meter Asset Providers ☐ AMR Service Providers ☐ EES Users ☐ GES Users ☐ GDCC Users ☐ Other (please provide details in the Additional Information box)

ADDITIONAL INFORMATION *(Optional)*	

OTHER INDUSTRY CODES? *(Optional)*	☐ BSC ☐ DCUSA ☐ SEC ☐ UNC ☐ IGT UNC
ADDITIONAL INFORMATION *(Optional)*	

DOES THIS CHANGE PROPOSAL IMPACT A SIGNIFICANT CODE REVIEW? *(Optional)*	
ADDITIONAL INFORMATION *(Optional)*	

5 CHANGE PROGRESSION

DO YOU BELIEVE THIS CHANGE PROPOSAL MEETS THE CRITERIA FOR 'URGENCY' AND SHOULD BE PROGRESSED UNDER AN URGENT TIMETABLE? **IF SO, PLEASE PROVIDE JUSTIFICATION?** *(Optional)*	No

ARE THERE ANY REQUIRED TIMESCALES FOR THE DEVELOPMENT OR IMPLEMENTATION OF THIS CHANGE PROPOSAL? *(Optional)*	This is not urgent but it is a big issue and we would like this change to be progressed as soon as possible.
ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THE CHANGE PROPOSAL WHICH MAY IMPACT ITS PRIORITY OR PROGRESSION TIMETABLE? *(Optional)*	No
DOES THIS CHANGE PROPOSAL RELATE TO AN EXISTING OR PREVIOUS CHANGE PROPOSAL? *(Optional)*	No

6 ATTACHMENTS

ATTACH/PROVIDE ANY SUPPORTING DOCUMENTS TO BE SUBMITTED WITH THE FORM	