RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0232 – NON-DOMESTIC CHANGE OF OCCUPIER SDEP SCREENS (R0155 SOLUTION)

On 14 March 2025, the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0232.

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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RESPONSE TYPE	Non-Confidential
DATE ISSUED	08/04/2025
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	James Hardy

DATE IMPACT ASSESSMENT ISSUED	14/03/2025
RESPONSE DEADLINE	04/04/2025

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	SSE support the proposed solution, but for it to work SDEP should be made mandatory for Gas Suppliers.	Thank you for your response. As part of REC Change Proposal R0155, Gas Suppliers have been mandated to use SDEP for the Non-Domestic Change of Occupier process.
ENGIE (Energy Supplier)	Only one – we think it would be useful to add a customer name field to the SDEP screens.	Thank you for your response. The Code Manager will add this to the list of requirements.
Brook Green Supply Limited (Energy Supplier)	We agree with the proposed solution of new process types within SDEP, and the mandate for energy suppliers to use these process types and the SDEP system to communicate CoS with a CoO flag. We believe that this will help ensure consistency in communication and documentation between suppliers, and help assure performance with the data made available to the REC. This will in turn benefit consumers by enabling suppliers the best opportunity to meet the SLA obligations prescribed within R0155 for the review and acceptance of documentation. We would suggest that with the interim solution of using PT0067 an PT0056 that it be encouraged or mandated that:	Thank you for your response. Please note the interim solution of PT0067 and PT0056 refers to the solution for REC Change Proposal R0155. However, the Code Manager can clarify the following: 1) The interim solution is out of scope for Issue I0232, but as part of REC Change Proposal R0155, the Code Manager has provided instructions on how Energy Suppliers should use the

	1) A consistent “Subject” is used, as this is currently free text within the PT0067 and PT0056 2) That all energy suppliers include the full information that is proposed for the new process type (e.g. • Meter Point X Number (MPxN, Multi MPAN information, Date of CoO, number of attachments, Additional Information) within the body of the message. 3) The attachments function is used as expected to upload the documentation, rather than any links to third party portals or similar.	PT0067 and PT0056 screens, including the Subject that should be used. 2) We can include instructions encouraging this within our R0155 Guidance Document and our SDEP User Guides. 3) This is indeed the expectation, and further information on the expectations of how to use the interim solution for R0155 have been included in the supporting user guides and guidance documents for the R0155 Change Proposal.
ScottishPower Energy Retail Limited (Energy Supplier)	We welcome the proposal to create dedicated SDEP screens for managing the non-domestic CoO process. However, we note that the list of information items does not provide context on what Date of CoO means. The glossary section in the document defines a CoO as indicating that the consumer at a premises has changed. We believe this definition lacks sufficient clarity for users of the SDEP screens when exchanging information. Therefore, we strongly recommend that the date of CoO in the Information section should mean the date on which the CoO takes effect and not the day the other party was notified to ensure all users have a consistent understanding.	Thank you for your response. The Code Manager will take this into consideration during the solution development of the screens. Once the screens have been developed, further information, including context and guidance, on the screens will be provided.

	We also propose an update to Schedule 30 section A subsection 1.5 which excludes non-domestic gas suppliers from using SDEP when dealing with personal information/data of consumers. This update is necessary to prevent conflicts on what processes to use since schedule 30 excludes nondomestic gas suppliers are excluded and the proposed screens include an option for non-domestic gas suppliers and personal data would be handled during the process on SDEP. Finally, we request clear definitions regarding the escalation process for gas and electricity including the applicable SLAs when disputes are not resolved. The current timescales for responding to queries is 10WD. However, the escalation process does not have defined SLAs for the process.	The new Non-Domestic Occupier Schedule mandates Gas Suppliers to use SDEP for the Non-Domestic Change of Occupier process. This is out of scope of this REC Issue.

Question 2:	Do you agree with the information items included for the newly developed Non-Domestic Change of Occupier SDEP screens? Please list any further information items you believe should be included, or items that could be excluded.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	SSE agree with the information items included. We believe the new screen should be as simple as possible for the end user to be able to populate the required information.	Thank you for your response.
ENGIE (Energy Supplier)	See response to Q1.	Thank you for your response.

Brook Green Supply Limited (Energy Supplier)	Yes. It would be beneficial if the incoming supplier could include contact details for the customer (or their TPI) should the incumbent need to conduct further verification of the CoO documentation to aid acceptance.	Thank you for your response. The Code Manager will add this to the list of requirements.
ScottishPower Energy Retail Limited (Energy Supplier)	Please see our response to Q1 above for the definition of CoO in the information items listed as part of the solution. This should be clarified to mean date on which the Change of Occupier takes effect.	Thank you for your response.

Question 3:	Do you believe that there are any further specific items that should be included in the Non-Domestic Change of Occupier Escalation Screens? Please note, the escalation screens will be the standard escalation screens.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No further items required to be added, we believe the suggested items are sufficient.	Thank you for your response.
ENGIE (Energy Supplier)	See response to Q1.	Thank you for your response.
Brook Green Supply Limited (Energy Supplier)	It would be useful to see the number of rejections from the incumbent supplier. This would enable differentiation between an escalation for failure to respond / breach of SLA, versus an incumbent meeting SLA each time they reject, but rejecting multiple times without clear feedback on what is required.	Thank you for your response. Please note, this will be dependent on the reporting requirements including in REC Change Proposal R0122.
ScottishPower Energy Retail Limited (Energy Supplier)	N/A	Thank you for your response.

Question 4:	Do you have any further comments relating to this Issue?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No.	Thank you for your response.
ENGIE (Energy Supplier)	No.	Thank you for your response.
Brook Green Supply Limited (Energy Supplier)	Regarding the automatically populated “date of creation” and “date of response” and subsequent performance assurance reporting taken from this. The RAG status will need to re-set following the rejection of documentation back from the incumbent supplier. When the incoming supplier re-submits new documentation via the same PT how would the 10 working day SLA be measured, as the PT would still show the original date of creation. Would the incoming supplier be expected to raise a new PT to the incumbent so that the dates accurately reflect the SLA? As the PT for duplicate meter points (general query) for gas and electricity have been used as an interim solution, would the incumbent energy supplier be expected to respond on SDEP that they have accepted the documentation in lieu of the “Accept Evidence Y / N” function in the proposed new PT’s or would it be taken that it had been accepted if a rejection is not returned?	Yes, the incoming supplier would be expected to raise a new PT. Yes.
ScottishPower Energy Retail Limited (Energy Supplier)	N/A	Thank you for your response.