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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0254 – NON-DOMESTIC CHANGE OF OCCUPIER REPORTING

On 22 August 2025, the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0254.

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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RESPONSIBLE COMMITTEE	REC Performance Assurance Board
LEAD ANALYST	James Hardy

DATE CONSULTATION ISSUED	22/08/2025
RESPONSE DEADLINE	15/09/2025

Question 1:	1.Do you agree that the proposed solution resolves the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	We agree that the proposed solution addresses the problem statement. The phased approach of starting with energy suppliers uploading only the CoT tab from the Ofgem Non-Domestic Market Monitoring RFI and then transitioning to option 2 of Ofgem sharing the same data directly with the REC Code Manager aligns with resolving the problem.	Thank you for your response.
Centrica (Energy Supplier)	We agree that the proposed solution does address the problem statement; however, would urge that RECCo establish an agreement with Ofgem in a timely manner to avoid duplication of effort from suppliers submitting the same data multiple times.	Thank you for your response.
ENGIE (Energy Supplier)	We agree that the proposed solution (Option 2, direct use of the Non-Domestic Market Monitoring (NDMM) RFI COT Excel worksheets, whether provided by Suppliers initially or directly by Ofgem) resolves the problem statement.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	We continue to welcome the reduced reporting requirements associated with R0155, and embodied in this proposal, compared to the original designs set out by the Code Manager. We concur that the aggregated data on non-domestic Changes of Occupier (Changes of Tenancy) requested by Ofgem through its Non-Domestic Market Monitoring RFI are sufficient and proportionate for the purposes of the Code Manager	Thank you for your response. Section 10 of the Change Report sets out that the PARC will contain the link to the latest Ofgem RFI template. The RFI is currently live and being

	monitoring the operation and effectiveness of R0155. While we agree with the proposal that non-domestic suppliers submit the same Ofgem-requested aggregated CoT data to the Code Manager in that regard, we also note that this Change Proposal has no legal text and does not set out in writing exact changes to the Performance Assurance Reporting Catalogue (PARC). In those respects, our comments are confined to the principles set out by the Code Manager in the Change Report published with this consultation. Without a specific written proposal (namely, legal text or PARC revisions), we are unclear on what the Performance Assurance Board would actually decide.	populated by Energy Suppliers so there are no new requirements to publish. The REC will not publish a version of each data item required for Change of Occupier (CoO) aggregated reporting as this creates a risk of differences in reporting as the Ofgem Template could be updated quickly while the PARC has to follow the Category 2 change process.
SSE Energy Supply Limited (Energy Supplier)	SSE agrees that the proposed solution does resolve the problem statement.	Thank you for your response.
Valda Energy (Energy Supplier)	Valda Energy agree that the proposed solution will resolve the problem statement, however we believe Scenario 2, where the REC and Ofgem come to an agreement around submitting and sharing data would be the best scenario to move forward with to lessen the admin burden on Energy Suppliers.	Thank you for your response.

Question 2:	Do you agree with the proposed solution, including the proposal and details for transition from REC Portal Submission to a formal agreement between Ofgem and the Code Manager? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	Yes, we agree with the proposed solution, including the proposal and details for transition from REC Portal Submission to a formal agreement between Ofgem and the Code Manager. However, we believe that there is inconsistency in the wording of the proposed solution. In the first part it says that the solution is either option 1 or option 2. However, in the second part it suggests transitioning from option 1 to option 2 to implement a quicker and more efficient solution. If the proposed solution is the phased implementation, the wording should be adjusted accordingly. However, if the solution is either option 1 or option 2, we opt for option 2 as we stated during the previous party impact assessment. However, we are able to accept during transition to provide a copy of the Ofgem RFI data for Change of Tenancy via the REC portal, in the same format and frequency as to which we provide to Ofgem.	Thank you for your response. The Code Manager continues to engage with Ofgem to establish if and when a formal agreement can be put in place. This means that currently, the only option available is option 1. Throughout the R0155 solution development it was recognised that ongoing assurance is a key part it. As such the Code Manager is recommending Option 1, for now, to avoid any delays to their ability to assure the R0155 solution. Option 2 may still become available and when it is the Code Manager will ensure Energy Suppliers are updated promptly to allow them to stop having to submit a copy of relevant part of the Ofgem template.
Centrica (Energy Supplier)	We agree with the proposed solution; however, as stated in response to question 1 we urge RECCo to establish an agreement with Ofgem in a timely manner to avoid duplication of effort from suppliers submitting the same data multiple times.	Thank you for your response.

ENGIE (Energy Supplier)	Yes, it makes sense for Suppliers only to have to submit the data once.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	In line with our response to Question 1, we agree with the proposal for non-domestic suppliers to submit the same Ofgem-requested aggregated CoT data – in the same (extracted) format and at the same frequency – to the Code Manager. At the same time, we believe that the exact written changes to the PARC should be made available for review and comment before taking effect. Should the Code Manager seek to conclude with Ofgem a data sharing agreement to receive the same CoT data, we believe that non-domestic suppliers should be fully apprised of that work in good time. In that case, we would like to understand how the PARC would be amended accordingly. We do not agree with the suggestion made in the Change Report that any future change to the "structure, frequency or content of the RFI" by Ofgem would automatically apply in respect of any reporting requirements under the REC. Should Ofgem materially change its reporting request for CoTs in the future (noting that the rest of the RFI does not apply to the REC generally or to R0155 specifically), we believe that suppliers should continue to report the extant form of CoT data to the Code Manager until those future changes are reviewed within the structures of the REC to decide what amendments, if any, should be made to the PARC. We consider that approach to be appropriate, not least because the Code Manager's monitoring on R0155 need not change unless its resulting legal text also changes. We note that the Code Manager states in the Change Report that: "by linking to the Ofgem RFI, the solution establishes a framework for integrating external regulatory data into REC processes." In our view, this proposal (which, as we have noted, has no legal text) does not set	Thank you for your response. The Code Manager has agreed to use the Ofgem template (including any future updates and versions of the template) to avoid any additional reporting burdens that could be placed on Energy Suppliers if they had to provide similar but different reports to the REC and Ofgem. As and when Ofgem amends the template the Code Manager will engage with them to ensure the updates continue to meet the REC Performance Assurance requirements.

	such a precedent. We consider this proposal to be an appropriate, one-off solution to a desire for reporting requirements for R0155, following the Code Manager's previous proposals for four new reports with MPxN-level data, which we considered infeasible and disproportionate. In our assessment, the suggestion that nondomestic suppliers provide the same Ofgem-requested aggregated CoT data to the Code Manager resolves that outstanding issue, but does not create a new direction of travel for REC PA reporting.	
SSE Energy Supply Limited (Energy Supplier)	Although we would prefer that Option 2 is available from the start, we appreciate this will not be possible with a short lead time. We welcome the proposal to transition to a formal agreement between Ofgem and the Code Manager so that Option 2 can be implemented.	Thank you for your response.
Valda Energy (Energy Supplier)	Yes, we agree this is the best proposed solution for the problem statement. We wish to note however that if the data is being shared across Code bodies that Ofgem should also be sharing any supplier provided commentary from the comments section of the RFI (CoT data tab) which could include additional information, assumptions made and context to the data provided.	Thank you for your response.

Question 3:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 07 November 2025? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	Yes, we agree with this implementation date.	Thank you for your response.
Centrica (Energy Supplier)	We are supportive of this change proposal being implemented on the 7 November, providing that the first submission due date to RECCo is after the 14 of November deadline of the Non-Domestic Market Monitoring RFI. This will ensure that any additional effort and time pressure is minimised on suppliers.	Thank you for your response.
ENGIE (Energy Supplier)	We agree with the proposed implementation timescale.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	We are content with the proposed implementation date of 7 November 2025, on the understanding that non-domestic suppliers provide CoT data from Ofgem's Non-Domestic Market Monitoring RFI for Q3 2025 (1 Jul to 30 Sept 2025) on or after submission to Ofgem on 14 November 2025, for Q4 2025 (1 Oct to 31 Dec 2025) on or after submission to Ofgem on 14 February 2026 and for each subsequent quarter on or after the submission date to Ofgem (as set out by Ofgem).	Thank you for your response. Your understanding is correct.
SSE Energy Supply Limited (Energy Supplier)	SSE supports the recommendation to approve this change proposal for implementation on 7 November 2025.	Thank you for your response.
Valda Energy (Energy Supplier)	We agree with the proposed implementation date of the 07/11/2025, with the Market Monitoring RFI dates and frequency it would be best to consider a sooner rather than later implementation date to avoid further backdate of data due to the R0155 implementation date in June 2025.	Thank you for your response. The proposed November implementation date is the earliest available Release following the conclusion of the Change Process.

Question 4:	Do you agree with the proposal to begin the reporting from 01 July using the standard Q3 Ofgem RFI submission that be the first submission completed post-implementation of this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	Yes, we agree with this reporting date. We believe that frequency of the submission on the REC portal and data we provide through Ofgem RFI should be the same, quarterly basis.	Thank you for your response.
Centrica (Energy Supplier)	We are supportive of this aspect of the proposal.	Thank you for your response.
ENGIE (Energy Supplier)	Yes.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	In line with our response to Question 3, we agree with the suggestion that non-domestic suppliers begin providing the same Ofgem-requested aggregated CoT data to the Code Manager with Q3 2025 of Ofgem's Non-Domestic Market Monitoring RFI, noting the submission dates set out by Ofgem.	Thank you for your response.
SSE Energy Supply Limited (Energy Supplier)	Yes, we agree with the proposal to begin the reporting from 1st July, using the standard Q3 RFI.	Thank you for your response.
Valda Energy (Energy Supplier)	We agree with the reporting to begin from the 01/07/2025 to then fall in line with the Market Monitoring RFI that will be due on the 14/11/2025.	Thank you for your response.

Question 5:	Do you agree with the Code Manager's assessment of the costs and benefits for this change? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	There are no benefits for the business in implementing option 1, only cost and duplication. There are no benefits to the business for option 2, however as the data is already compiled for Ofgem, there would be no additional cost or duplication should the REC Code Manager and Ofgem agree a data sharing arrangement.	Thank you for your response.
Centrica (Energy Supplier)	We agree with the code managers assessment of the costs and benefits for this change. However, to reduce the cost to suppliers further would urge that RECCo establish an agreement with Ofgem in a timely manner to avoid duplication of effort from suppliers submitting the same data multiple times.	Thank you for your response.
ENGIE (Energy Supplier)	Yes.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	We have no additional comments on the costs and benefits of this proposal at this stage.	Thank you for your response.
SSE Energy Supply Limited (Energy Supplier)	Yes, we agree with the costs and benefits.	Thank you for your response.
Valda Energy (Energy Supplier)	Valda Energy agree with the assessed costs.	Thank you for your response.

Question 6:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	No	Thank you for your response.
Centrica (Energy Supplier)	We have no further comments.	Thank you for your response.
ENGIE (Energy Supplier)	No.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	We note that Ofgem issued to non-domestic suppliers a revised template and revised guidance for its Non-Domestic Market Monitoring RFI in August 2025. We trust that the Code Manager will take these versions into account in its intention to amend the PARC in relation to this proposal.	Thank you for your response. Yes, the PARC will continue to link to the most up to date version of the template and associated guidance documents.
SSE Energy Supply Limited (Energy Supplier)	The first REC submission date should be aligned with the Ofgem RFI submission date of 14th November 2025. Can you confirm that this submission should only include the data for Q3 (1st July to 30th September 25) and the data for 1st October to 7th November should be included in the Q4 submission?	Thank you for your response. Yes, the first submission is due on 14/11/2025 and will cover Q3 (01/07/2025 – 30/09/2025).
Valda Energy (Energy Supplier)	No	Thank you for your response.