RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0269 SCHEDULE 5 – CHANGE MANAGEMENT: CLARITY AND TYPOGRAPHICAL REVIEW

On 05 September 2025 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0269 Schedule 5 – Change Management: Clarity and Typographical Review.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

DOCUMENT VERSION	V1.0
RESPONSE TYPE	Non-confidential
DATE ISSUED	29 September 2025
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	James Hardy

DATE CONSULTATION ISSUED	05 September 2025
RESPONSE DEADLINE	26 September 2025

Question 1:	Do you agree with the proposed solution? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	In the most part, we agree with the overall proposed solution. However, we do feel that paragraph 19.3 of Schedule 5 needs some additional information/clarification and we have expanded on this in our answer to question 2.	Thank you for your comments.

Question 2:	Do you have any comments on the legal drafting? Please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Regarding paragraph 19.3: *19.3. Any changes made after consultation shall ~~must~~ be documented in the Change Report (Final Recommendation). The Code Manager may decide to re-issue the Change Proposal for consultation if it is felt the changes suggested ats consultation are significant enough to warrant this.* The replacement of the word 'must' with the word 'shall' implies a weakened obligation and could cause ambiguity and confusion. We feel	Thank you for your comments. Paragraph 19.3 is a new paragraph added under R0269, so it is not a loosening of a current obligation. Legal advice received previously has indicated "shall" is the preferred wording as it allows for situations where other steps may be taken to fulfil the same obligations.

	that any changes made after consultation should be clearly communicated in the interest of transparency, and therefore the word 'must' is much more appropriate for this reason as it would enforce the obligation to do so. Who decides if the changes suggested at consultation are considered significant enough to warrant a second consultation? The Code Manager? If so, should responsible Sub-Committees not be offered involvement in the process of making this decision, to emphasize the benefit of introducing greater transparency and accountability into the Change process? What are the criteria that the decision of whether or not there will be a second consultation be based on? If there are likely to be instances where some changes go back out for a second consultation and others don't, purely based on the decision of the Code Manager, we feel it is necessary to provide some clarity on what may lead to the decision being made rather than just stating that the changes must be 'significant enough'. In addition, in the interest of clarity, transparency and accountability, we believe the reasons that have led to the decision being made to reissue a consultation, or the decision to not do so, should be published in order for interested parties to take note and be aware of. Perhaps also an appeals process of some kind could be considered to allow parties more of a chance to voice their opinions on decisions that have been made.	If the Code Manager did not confirm any changes made in the Change Report (Final Recommendation), it would need to prove to any auditors that steps taken still fulfilled this obligation. An example of this could be REC Change R0152, which confirmed that many changes were made following consultation but did not provide a list of those changes within the report as it was too lengthy. It did however signpost to where all of those changes could be found. It is mostly within the gift of the Code Manager to decide whether to take a Change Proposal for a second consultation. However, if the Responsible Sub-Committee felt they did not have all the information they needed to make a decision without a second consultation, they could direct the Code Manager to do so. The introduction of an appeals process for Parties to vote on whether a second consultation is required would be a brand-new process, and not one that is within the scope of R0269. The Code Manager encourages Parties to raise a new Change Proposal suggesting this if this is something they would like to be considered.

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**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree that the proposed implementation date is suitable.	Thank you for your comments.

Question 4:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree.	Thank you for your comments.

Question 5:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution	No further comments.	n/a

(Distribution Network Operator)		