RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0280 CSS CERTIFICATE AUTHORITY AUDIT CLARIFICATION

On 23 October 2025 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0280 – CSS Certificate Authority Audit Clarification.

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	18 November 2025
RESPONSIBLE COMMITTEE	Performance Assurance Board
LEAD ANALYST	Bela Ashworth

DATE CONSULTATION ISSUED	24 October 2025
RESPONSE DEADLINE	14 November 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)	Yes. By making this change it should remove any ambiguity that led to confusion over responsibilities. By adding that the Switching Operator is to ensure the audit on an annual basis removes any doubt.	Thank you for your comments.

Question 2:	Do you agree with the proposed implementation approach (BIG BANG)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes we are inclined to agree with the proposed implementation plan. This change removes any confusion in terms of responsibility and we cannot see any reason to delay.	Thank you for your comments.

Question 3:	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, from what we can see there should be no cost associated with this CP. We are happy with the benefits described as reason for making this change.	Thank you for your comments.

Question 4:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the Performance Assurance Board?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes. As this CP is changing the wording in clause 9.1 to remove confusion and to remove any ambiguity that should not have any impacts in terms of knock on effects, we agree that this is a self-governance proposal.	Thank you for your comments.

Question 5:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to determination by the Authority following approval by the Performance Assurance Board?
The Code Manage included this question in error. Please refer to Question 4.	

Question 6:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 27 February 2026? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Thank you for your comments.

Question 7:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No.	N/A