RETAIL ENERGY CODE

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REC CHANGE PROPOSAL SUBMISSION FORM (COPY)

1 PERSONAL DETAILS

PROPOSER NAME *(Mandatory)*	Anna Weeks
EMAIL ADDRESS *(Mandatory)*	anna.weeks@retailenergycode.co.uk
TELEPHONE NUMBER *(Optional)*	
COMPANY *(Optional)*	Retail Energy Code (RECCo)
COMPANY TYPE *(Optional)*	Code Manager
IS YOUR COMPANY A REC PARTY? *(Optional)*	

2 CHANGE DETAILS

CHANGE TITLE *(Mandatory)*	Update to Schedule 9 "Qualification and Maintenance" to clarify external testing requirements
PROVIDE A SUMMARY OF THE PROPOSED CHANGE *(Mandatory)*	Updating Schedule 9 to clarify the external DIP Testing arrangements
DESCRIBE THE CURRENT ISSUE *(Mandatory)*	We are seeking to clarify the schedule 9 drafting in relation to external testing introduced to implement the MHHS arrangements through R209. The aim/expectation when the MHHS updates to Schedule 9 were made was to: • Introduce a prerequisite for Qualification that the DIP Manager must confirm to the REC Code Manager that it had completed its DIP Onboarding checks as required under the DIP Rules, and

	• Provide for REC Code Manager to undertake external testing of the new MHHS related REC business processes that use the DIP. In practice, the new MHHS business processes use the DIP and the DTN and therefore the external testing developed comprised of test case that check business processes conducted by both the DIP and the DTN. The testing scenarios are based on content develop in consultation with market participants under the MHHS Programme and allow for those roles governed under BSC and REC to meet their testing requirements through a single, coordinated exercise. As the drafting introduced by R209 was developed before the enduring external testing provisions were finalised, the detail of what is required by the DIP testing is high-level and it is not clear enough that it incorporates testing of the DTN for Meter Operator Agents. This could result in confusion to applicants undertaking the process.
WHAT IS THE ITENDED OUTCOME/OBJECTIVE? *(Mandatory)*	A lack of clarity in Schedule 9 on the Qualification testing provisions could cause confusion to applicants undertaking Qualification or Maintenance of Qualification activity. The intending outcome is for the requirements to be clear.
PROVIDE EVIDENCE AND IMPACTS *(Optional)*	
WHAT IS THE PROPOSED SOLUTION? *(Mandatory)*	To resolve this we are proposing to update Schedule 9 to: 1. Amend the definition of DIP Testing link this to the Category Three document where the tests are specified- “Qualification and Maintenance: REC Testing Approach” 2. Amend paragraphs 7.13/7.14 to reflect more clearly the two parts to DIP Testing – (1) becoming a DIP User in accordance with the DIP Rules and (2) completing the other tests required by the Code

	Manager/RECCo set out in the Category 3 document "Qualification and Maintenance: REC Testing Approach" 3. Amend paragraphs 7.2A to reflects the risk based approach taken to the execution qualification testing to allow the Code Manager discretion where Systems have already been tested 4. Amended paragraphs 7.2.8A and 7.1(b) to require MOAs to undertake DTN testing (Proposed amendments attached)
WHAT OTHER SOLUTIONS HAVE BEEN CONSIDERED? *(Optional)*	
PROVIDE DRAFT REC LEGAL TEXT *(Optional)*	
ALTERNATIVELY, PASTE DRAFTING WORDING OR MARK-UPS HERE *(Optional)*	
UPLOAD ANY ADDITIONAL BACKGROUND INFORMATION OR SUPPORTING DOCUMENTS *(Optional)*	
BRIEFLY EXPLAIN WHAT EACH DOCUMENT IS AND WHY IT IS RELEVANT *(Optional)*	

3 IMPACTS

WHAT ARE THE CONSUMER IMPACTS? *(Optional)*	This change ensures that there is clarity to applicants in relation to external testing for REC Qualification. It will help to avoid confusion and delays to applicants, providing a robust process without unnecessary delays
WHICH REC DOCUMENTS ARE IMPACTED? *(Optional)*	Schedule 1 – Interpretations and Definitions Schedule 9 – Qualification and Maintenance
DESCRIBE THE IMPACT *(Optional)*	Clarifies the external testing requirements as set out in the attached redlining
WHICH MARKET PARTICIPENTS ARE IMPACTED? *(Optional)*	DNOs, IDNOs, MOAs, Electricity Suppliers
DESCRIBE THE IMPACT *(Optional)*	This change will make the testing approach taken during REC Qualification and Maintenance clearer for Electricity Suppliers, DNOs and MOAs.
WHICH REC SERVICES ARE IMPACTED? *(Optional)*	
DESCRIBE THE IMPACT *(Optional)*	

4 MATERIALITY, URGENCY AND PRIORITY

DOES THIS CHANGE HAVE A MATERIAL CONSUMER IMPACT? *(Optional)*	No
EXPLAIN YOUR REASONING *(Optional)*	
DOES THIS CHANGE CREATE A MATERIAL DIFFERENCE BETWEEN PARTY TYPES OR CLASSES? *(Optional)*	No
EXPLAIN YOUR REASONING *(Optional)*	
DOES THIS CHANGE HAVE A MATERIAL GOVERNANCE/DECISION IMPACT? *(Optional)*	No
EXPLAIN YOUR REASONING *(Optional)*	

SHOULD THIS CHANGE BE TREATED AS URGENT UNDER OFGEM'S CRITERIA? *(Mandatory)*	Not Urgent
EXPLAIN WHAT MAKES THIS URGENT *(Optional)*	
ARE THERE ANY TIME CRITICAL DATES? *(Optional)*	As this change provides clarity to support the qualification and maintenance activity of new applicants it should be made as soon as possible
SUGGEST AN OVERALL PRIORITY FOR THIS CHANGE PROPOSAL BASED ON OFGEM'S PRIORITISATION GUIDANCE *(Mandatory)*	Standard
EXPLAIN THE REASONING FOR YOUR SELECTION *(Mandatory)*	This change relates to clarification of the existing Qualification Process and not the future direction of travel. **SDS**: This change does not link to an SDS requirement. **Importance**: This change ensures that there is clarity to applicants in relation to external testing for REC Qualification. It will help to avoid confusion and delays to applicants, providing a robust process without unnecessary delays. **Complexity**: This is a clarification the schedule to better reflect the existing process and is not expected to require any changes other than an amendment to the legal text of the schedule. There is a CCS related change (I0318) which amends this schedule in progress and amendments expected from R0325 – "Post MHHS Full Transition Complete-REC Updates". These amendments to the schedule may need to be managed to avoid any unintentional confusion as they are implemented

5 ADDITIONAL INFORMATION

HOW DOES THIS CHANGE AFFECT REC'S MISSION? *(Mandatory)*	Positive
EXPLAIN YOUR SELECTION *(Mandatory)*	This change ensures that there is clarity to applicants in relation to external testing for REC Qualification. It will help to avoid confusion and delays to applicants, providing a robust process without unnecessary delays.
HOW DOES THIS CHANGE PROECT CUSTOMERS' INTERESTS AND DATA? *(Mandatory)*	Positive
EXPLAIN YOUR SELECTION *(Mandatory)*	This change ensures that there is clarity to applicants in relation to external testing for REC Qualification. It will help to avoid confusion and delays to applicants, resulting in a greater number of suitably competent REC Parties to provide services to consumers.
HOW DOES THIS CHANGE IMPROVE OPERATIONAL EFFICIENCY? *(Mandatory)*	Positive
EXPLAIN YOUR SELECTION *(Mandatory)*	This change ensures that there is clarity to applicants in relation to external testing for REC Qualification. It will help to avoid confusion and delays to applicants, providing a robust process without unnecessary delays.
IS THIS CHANGE LINKED TO ANY EXISTING REC ISSUES OR CHANGE PROPOSALS? *(Optional)*	This is a clarification the schedule to better reflect the existing process and is not expected to require any changes other than an amendment to the legal text of the schedule and is not directly linked to any other change. There is a CCS related change (I0318) which amends this schedule in progress and amendments expected from R0325 – "Post MHHS Full Transition Complete-REC Updates". These amendments to the schedule may need to be managed to avoid any unintentional confusion as they are implemented
IS THIS PART OF A WIDER CHANGE THAT AFFECTS OTHER INDUSTRY CODES? *(Optional)*	No
LIST AND DESCRIBE WHAT CHANGE IS NEEDED IN THE OTHER CODE(S) *(Optional)*	
DOES THIS CHANGE PROPOSAL RELATE TO (OR	No

DEPEND ON) A SIGNIFICANT CODE REVIEW (SCR) OR OTHER MAJOR PROGRAMME? *(Optional)*	
IS ANY OF THE INFORMATION PROVIDED CONFIDENTIAL? *(Optional)*	No
ANY OTHER COMMENTS? *(Optional)*	