RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0227 – DOMESTIC ELECTIVE HALF HOURLY SWITCHING

On 14 March 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0227.

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	11/04/2025
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Caroline Freimuller

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**
OVO Energy (Energy Supplier)	Yes, the proposed text reflects OVO's interpretation of the existing rules, so we see this as a helpful clarification to make the rules more explicit.	Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	SSE currently follow this solution and support that this should be in included in the legal text.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	Yes we agree with the proposed solution.	Thank you for your response.

Question 2:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO Energy (Energy Supplier)	Partially. The proposed solution makes it explicit that suppliers that don't offer Elective HHS should be following the concurrent CoMC on CoS process. This should reduce rejected Change of Supplies as a result of customers being settled EHH. This will also improve outcomes for customers, as EHH is difficult to understand and should never have had an adverse impact on customer journeys. Anecdotally, we have observed rejected CoS in the past (due to the issue in question) from suppliers that do already offer EHH. This suggests the updated text may not entirely solve the problem.	Thank you for your response. The Code Manager will review the updated text and investigate this further.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	SSE agree that this addresses the problem statement.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	Yes, we agree the proposed solution addresses the problem statement.	Thank you for your response.

Question 3:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO Energy (Energy Supplier)	No.	Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	SSE currently follows the solution and believe it is the best outcome for customers.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	At this stage, we cannot identify any alternate solutions to this change.	Thank you for your response.

Question 4:	Do you believe the solution appropriately accounts for the industry's move to the new MHHS arrangements?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO Energy (Energy Supplier)	Yes. The solution is a clarification of rules which OVO think should have been explicit from the start of EHH in 2017, and impacts customer journeys today. We don't think it has any impact on the new MHHS arrangements, but makes it easier for suppliers to offer the benefits of HH settlement before MHHS.	Thank you for your response.

SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Once we move to the new MHHS arrangements this solution will no longer be required. However, in the meantime, it ties in with current regulations.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	If this is a concern prior to the MHHS implementation, then this change should be made as soon as possible.	Thank you for your response. The Code Manager will consider the implementation date as part of the Business Case Assessment and will confirm the proposed implementation date in due course.

Question 5:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO Energy (Energy Supplier)	No	Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No further comments.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	N/A	Thank you for your response.

Question 6:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO Energy (Energy Supplier)	No lead time, as OVO has already implemented a process that meets the requirements of this proposed solution.	Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No lead time required.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	N/A	Thank you for your response.

Question 7:	Are you aware of any constraints on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO Energy (Energy Supplier)	No, this should be being followed today.	Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No, as already in place.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	We are not aware of any constraints to this at this time.	Thank you for your response.

Question 8:	Do you foresee any risks to your MHHS implementation, qualification or migration plans caused by the delivery of this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO Energy (Energy Supplier)	No, this has no impact on MHHS.	Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	N/A	Thank you for your response.

Question 9:	Would implementing the proposed solution incur any costs to your business? If so, please provide details breaking down design/build/test costs and on-going costs. If preferable, please indicate which of the below ranges your costs may fall: A) Nil; B) Up to £9,999; C) Between £10,000 and £49,999; D) Between £50,000 and £99,999; or E) more than £100,000.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO Energy (Energy Supplier)	Nil.	Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Nil.	Thank you for your response.

ScottishPower Energy Retail Limited (Energy Supplier)	A	Thank you for your response.

Question 10:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO Energy (Energy Supplier)	Reduced customer complaints to OVO that are essentially caused by other suppliers (we currently have to CoMC around 7-8 MPANs each wee because of this issue), improve customer journey. Makes it easier for OVO and our customers to benefit from HH settlement today.	Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	We believe it will help prevent confusion to customers.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	This should provide clarity on what needs to happen between parties when dealing with this process.	Thank you for your response.

Question 11:	Taking into consideration both the costs and benefits seen by your organisation, do you consider this change should be made?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO Energy (Energy Supplier)	Yes	Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Yes.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	We think this change should be made.	Thank you for your response.

Question 12:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
OVO Energy (Energy Supplier)	No	Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	N/A	Thank you for your response.