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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0236 REC PARTY AUTO DE-ACCESSION PROPOSAL

On 06 March 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0236 REC Party Auto de-accession proposal.

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	1.0
RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	02 April 2025
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	06 March 2025
RESPONSE DEADLINE	28 March 2025

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No comments.	Thank you for your response.
Scottish Power (Energy Supplier)	We agree with the proposed amendments to the REC Main Body Section 17 – Ceasing to be a Party, to Schedule 19 - Market Exit and Supplier of Last Resort and the legal text.	Thank you for your comments.

Question 2:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we believe the proposed solution appropriately addresses the problem statement.	Thank you for your comments.
Scottish Power (Energy Supplier)	We agree with all proposed amendments to the impacted REC schedules and the legal text. The Party register on the REC portal should include information about parties who have acceded to the REC but not qualified.	Thank you for your comments.

Question 3:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No, as above we believe the proposed solution appropriately addresses the problem statement so no alternative is necessary.	Thank you for your comments.
Scottish Power (Energy Supplier)	We agree with all proposed amendments including the legal text.	Thank you for your comments.

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**
National Grid Electricity Distribution (Distribution Network Operator)	As per the Change Proposal, there appears to be no impact to the MHHS design and data spec, and only an indirect impact to the MHHS code drafting via amendments to Schedule 19, therefore this change should not affect the move to the new MHHS arrangements.	Thank you for your comments.
Scottish Power (Energy Supplier)	Yes.	Thank you for your comments.

Question 5:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No comments.	Thank you for your response.
Scottish Power (Energy Supplier)	No, we are happy with the proposed legal text.	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**
National Grid Electricity Distribution (Distribution Network Operator)	As the solution would only require us to update our internal documentation with the revised copies of the relevant REC documents, lead time requirements would be minimal.	Thank you for your comments.
Scottish Power (Energy Supplier)	We suggest either Nov 2025 or Feb 2026 implementation date.	Thank you for your comments.

Question 7:	Are you aware of any constraints on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No, we don't believe there would be any constraints on when this change could be delivered.	Thank you for your comments.
Scottish Power (Energy Supplier)	No.	Thank you for your comments.

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**
National Grid Electricity Distribution (Distribution Network Operator)	No.	Thank you for your comments.
Scottish Power (Energy Supplier)	We suggest an Impact assessment to be carried out as soon as possible to understand the number of Parties who may be expelled from the REC and may have to re-apply and re-qualify and the impact on	Thank you for your comments. As confirmed in the Change Report, there are around 80 Parties who have acceded to the REC but not Qualified under any role and

	Suppliers. The outcome of this analysis will determine if there are any risks to MHHS implementation, qualification or migration plans.	who have not contacted the Code Manager in 6 months or longer. These are predominantly Safe Isolator Providers (SIPs).

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**
National Grid Electricity Distribution (Distribution Network Operator)	A) Nil	Thank you for your comments.
Scottish Power (Energy Supplier)	We are unable to provide cost at this moment until we understand the impact. We suggest that the REC code manager should carry detailed analysis on the number of Parties to be expelled following this change goes live and the impact on the Suppliers. This will then determine the action required by the suppliers for example, change of agent and the cost involved.	Thank you for your comments.

Question 10:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Not directly, although it would be helpful to have a clearer way of establishing which other organisations have qualified for roles under the REC, should we need it.	Thank you for your comments.
Scottish Power (Energy Supplier)	Improved customer service.	Thank you for your comments.

Question 11:	Taking into consideration both the costs and the benefits seen by your organisation, do you consider this change should be made?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we believe this would be a viable change.	Thank you for your comments.
Scottish Power (Energy Supplier)	We agree that this change should be made but prior to that a detailed analysis must be carried out to understand the impact on the Suppliers and other Parties to realise the benefits vs costs.	Thank you for your comments.

Question 12:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Would this change have any cross code implications on the BSC and MDD/ISD? As we may encounter issues in MPRS if BSC and REC are not aligned.	Thank you for your comments. This change has been discussed at Cross Code Steering Group (CCSG) and no impact has been flagged by the BSC, but the Code Manager will raise this again in this forum.
Scottish Power (Energy Supplier)	No further comments.	n/a