RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0254 – NON-DOMESTIC CHANGE OF OCCUPIER REPORTING (R0155 SOLUTION)

On 06 June 2025, the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0254.

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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RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	James Hardy

DATE IMPACT ASSESSMENT ISSUED	06/06/2025
RESPONSE DEADLINE	27/06/2025

Question 1:	Do you have any comments on the proposed solutions, including any preference between delivery option 1 or 2?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	We strongly support Option 2 (a formal agreement between the REC Code Manager and Ofgem to share non-domestic Change of Occupier data) as the preferred choice.	Thank you for your response.
Drax Group plc (Energy Supplier)	We strongly prefer option 2 as it would prevent suppliers from needing to extract the information relating to CoOs from our NDMM RFI submissions and submitting this via the REC portal separately. We are aware that Ofgem is developing a formal data sharing agreement with Citizens Advice for Complaints data so we see no reason why this couldn't be replicated for CoO data.	Thank you for your response. The Code Manager Is aware of the ongoing developments between Ofgem and Citizens Advice and is continuing to engage with Ofgem and a similar agreement may be proportional for I0254.
E.ON Next (Energy Supplier)	We strongly recommend that option 2 is progressed and that reporting periods for REC should align to the reporting periods that OFGEM have put in place for the Non Domestic RFI. This will ensure that there is consistent reporting across REC and Ofgem. This has already been completed with the Prepayment Levelisation reporting that originally set up with Ofgem and has now transferred over to the REC. The president is already there that this can be achieved by an agreement that is sent out to suppliers to allow their data to be transferred from Ofgem to REC as Transferring of information Option 1 would require Suppliers to duplicate reporting and add additional unnecessary costs.	Thank you for your response. The Code Manager will take these points into consideration during the ongoing discussions with Ofgem about how an agreement may work in practice and as part of the Business Case Assessment.

ScottishPower Energy Retail Limited (Energy Supplier)	We welcome the opportunity to provide comments on the most appropriate method for providing information on non-domestic Changes of Occupier/Tenancy in relation to the R0155 change. Of the two solutions proposed by the Code Manager, we believe that option 1, which incorporates the Change of Tenancy section of the Ofgem Non-Domestic Market Monitoring (NDMM) RFI into the Performance Assurance Reporting Catalogue (PARC), is the most appropriate. We believe this approach presents a more efficient path, as it would eliminate the need for a data sharing agreement between the Code Manager and Ofgem.	Thank you for your response.
Utilita (Energy Supplier)	Our preference at this stage is option 1. We note that further details are needed regarding the complexity of setting up the data sharing arrangement between Ofgem and the Code Manager.	Thank you for your response. The Code Manager will provide further updates on any proposed arrangement between Ofgem and the Code Manager in due course. A solution will be fully formed and detailed prior to industry consultation.

Question 2:	Do you agree the proposed solutions address the problem statement, including if either solution addresses the problem statement more effectively than the other? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	Yes, though option 2 is less onerous on energy suppliers who would need to provide duplicate data to the REC if option 1 was chosen.	Thank you for your response.
Drax Group plc (Energy Supplier)	We recognise that data is required for performance assurance activity and agree that both solutions would provide REC with the data to undertake this role.	Thank you for your response.
E.ON Next (Energy Supplier)	Option 2 addresses the problem statement more effectively than option 1, as mentioned above creating additional monthly reporting will put unnecessary burden and costs onto Suppliers when they are already providing this information to Ofgem. Although option 1 does allow REC to manage Supplier performance on a monthly basis you can also achieve this by using the information from SDEP traffic and monitor the end to end time of a switch where the COT flag has been ticked. In turn this would enable REC to complete performance assurance monitoring outside of Supplier reporting and address any concerns with the individual Supplier as it arises.	Thank you for your response. The Code Manager will take this alternative approach into consideration as part of the Business Case Assessment stage of the Change Process.
ScottishPower Energy Retail Limited (Energy Supplier)	As outlined in our response to Q1, we believe that Option 1 should be adopted, as we believe it provides and effective and proportionate solution to providing information on non-domestic CoTs. Option 1 makes use of the already-established submission system. Therefore, we think this approach offers the best way forward and avoids the need	Thank you for your response.

	to develop and implement an entirely new data sharing mechanism (with Ofgem).	
Utilita (Energy Supplier)	Both solutions address the problem statement.	Thank you for your response.

Question 3:	REC Performance Assurance will require reporting to be backdated for the period between the go-live of R0155 and the implementation of I0254. To support operational efficiency and maximise organisational benefits, the Code Manager will assess the most appropriate date to backdate reporting from taking into account that R0155 goes live just two working days before the end of the month and Q2. Please indicate your preference of date below and provide rationale: A) 27 June 2025 (R0155 go-live) B) 30 June 2025 (First Working Day after R0155 implementation) C) 01 July 2025 (Start of Q3 reporting quarter) D) Other (please state)	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	C) 1st July 2025	Thank you for your response.
Drax Group plc (Energy Supplier)	D. We have advised Ofgem that we are not currently able to provide the information requested on CoOs, however we are developing our system and processes to be able to include this in our NDMM RFI submissions later in 2025. We therefore believe that the data should only be sourced by the REC after the proposed implementation date for code modification (e.g. 5th November 2025) and no backdated information should be required. It would therefore be appropriate to begin collecting data from the first report submitted after this date, i.e. reflecting activity from 1st January 2026.	Thank you for your response. We have noted your alternate preference of date and your reasoning. The Code Manager will be able to provide further details following the completion of the REC Performance Assurance Service Provider impact assessment.

E.ON Next (Energy Supplier)	We strongly recommend that option 2 is developed and the data aligns to the 1st submission of the quarterly Ofgem Non Domestic reporting period, and aligns with Ofgem reporting from that point onwards. This would ensure that Suppliers did not have to complete multiple reporting that is ultimately giving the same information to both Ofgem and REC. Given the timescales of this consultation and that the solution has not been fully developed by REC we do not see that options A to C are feasible start dates. As stated above reporting should align to the Ofgem reporting periods and only when a fully developed solution has been developed and that this solution has completed the REC change process and Suppliers have had the opportunity to review and respond to the final detail of the reporting solution.	Noted, thank you for your response. Energy Suppliers will have the opportunity to review and respond to the final detail of the reporting solution during the consultation. The Code Manager will also provide updates on the development to the REC Change Issues Group.
ScottishPower Energy Retail Limited (Energy Supplier)	We believe that supplier reporting in relation to R0155, once in place, should be backdated to 1 July 2025. That approach would align with the reporting periods of the Ofgem Non-Domestic Market Monitoring RFI (namely, the start of Quarter 3, 2025). Under Ofgem's current schedule, that Q3 NDMM RFI Submission will be due on 14 November 2025. In our view, any concurrent reporting in relation to R0155 should therefore begin only on or after 14 November 2025. Given that the NDMM RFI is a quarterly submission with monthly data, our understanding is that supplier reporting in relation to R0155 would be the same. By the same token, we believe that the submission dates should be the same for both the NDMM RFI and R0155 reporting. In our view, aligning the NDMM RFI and R0155 reporting schedule in this way would avoid additional administrative/resource burdens on supplier	Thank you for your response.
Utilita (Energy Supplier)	C) 01 July 2025 (Start of Q3 reporting quarter)	Thank you for your response.

Question 4:	Would implementing either proposed solution incur any costs to your business? If so, please provide details and specify if different for each solution option. 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**
Brook Green Supply (Energy Supplier)	B) Up to £9,999	Thank you for your response.
Drax Group plc (Energy Supplier)	It is difficult to provide estimated costs, but we will incur costs to be able to report CoO data externally.	Thank you for your response.
E.ON Next (Energy Supplier)	If Option 2 was progressed then there would be no additional costs for our business to implement the reporting for this change. However if Option 1 was progressed we would estimate the costs to be between £10,000 and £49,999	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	As this proposal related to providing information which we provide to Ofgem, we have already incurred the principal costs in developing our associated reporting to Ofgem. In that light, we do not anticipate incurring significant additional costs for the proposed R0155 reporting.	Thank you for your response.
Utilita (Energy Supplier)	A) Nil.	Thank you for your response.

Question 5:	What lead time would be required for your business to implement the proposed solutions? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	For option 2, no lead time would be required as the data is already being collated and provided to Ofgem under their RFI. For option 1, 3 months would be required to prepare the proposed solution, ensuring that our operations and data teams have sufficient time to scope and create reporting solutions, should the REC Code Manager's data parameters differ to those that Ofgem's RFI required.	Noted, thank you for your response. The Code Manager does not expect the data parameters to differ to those that are required in the Ofgem RFI.
Drax Group plc (Energy Supplier)	Please see our answer to Q3.	Please see the Code Manager comments for Q3.
E.ON Next (Energy Supplier)	We have already developed the Ofgem Non Domestic report, if option 2 was progressed there would be minimal additional lead time needed for us to deliver reporting for the COT element. However if option 1 was progressed we would have to develop a new set of reporting based on the requirements set out by the REC. Would require at least two months to fully develop, test and deploy the new reporting and to get sign off from the business owner within our organisation.	Noted. Thank you for your response. Under delivery option 1, the data will be exactly the same as that requested in the Ofgem RFI. Under option 1, the data will be the same, using the same reporting template, but the COT sheet would have to be uploaded to the REC Portal as well as submitted to Ofgem. No new, or additional data would be requested to demonstrate compliance with the changes made within R0155.
ScottishPower Energy Retail Limited (Energy Supplier)	We will require zero lead time to implement the proposed solution for our business.	Thank you for your response.

Question 6:	Do you identify any benefits to your business through the implementation of the proposed solution(s)?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	There are no benefits for the business in implementing option 1, only cost and duplication. There are no benefits to the business for option 2, however as the data is already compiled for Ofgem, there would be no additional cost or duplication should the REC Code Manager and Ofgem agree a data sharing arrangement.	Noted, thank you for your response.
Drax Group plc (Energy Supplier)	We have no answer to this question.	Noted. Thank you for your response.
E.ON Next (Energy Supplier)	Option 2 would be the easier option to complete and reduce additional costs and time in developing new reporting Option 1 would cost more and would require additional ongoing costs.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	We have no comments on the benefits of this proposal at this stage.	Noted. Thank you for your response.
Utilita (Energy Supplier)	This change will enhance reporting and compliance for the non-domestic tenancy process. It establishes a benchmark for the industry, even though it would be reported internally regardless.	Thank you for your response.

Question 7:	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**
Brook Green Supply (Energy Supplier)	We consider that option 2 should be made, to provide the REC PAB with the necessary visibility of energy supplier CoO performance in line with R0155. We recognise that the REC PAB needs visibility of performance, and that if option 2 is not possible then option 1 will be the only option, however if this is the case we refer to our response to the R0155 consultation where we, along with other respondents, strongly challenged the necessity for MPxN line level data. If option 1 is taken, the data should be "like-for-like" with what is being provided under the Ofgem RFI, which we believe is sufficient to demonstrate compliance with the changes made within R0155.	Thank you for your response. Under delivery option 1, the data will be exactly the same as that requested in the Ofgem RFI. Under option 1, the data will be the same, using the same reporting template, but the COT sheet would have to be uploaded to the REC Portal as well as submitted to Ofgem. No new, or additional data would be requested to demonstrate compliance with the changes made within R0155.
Drax Group plc (Energy Supplier)	Please see our answers to Q3 and Q4. We agree that this change should be made but believe that REC should not seen to backdate the data collected to an earlier date.	Thank you for your response. Please see further Code Manager comments in Q3 and Q4.
E.ON Next (Energy Supplier)	We do believe that there should be adequate performance reporting to monitor Supplier performance and believe this can be achieved by using the Ofgem Non Domestic RFI data rather than a completely new set of reporting requirements. Option 2 delivers this and will align reporting across Ofgem and REC giving a consistent view of performance. There are other ways that REC can monitor the length of time that a switch with the COT flag is activated through SDEP and the data that is available within the CSS and switch completion date.	Thank you for your response. Noted, we will take this into consideration as part of the Business Case Assessment.

ScottishPower Energy Retail Limited (Energy Supplier)	We welcome the more streamlined approach to R0155 reporting set out in this proposal, compared to earlier proposals made in this regard. We believe that providing the same information to Ofgem and the Code Manager, in the same form and on the same timetable, is an appropriate and proportionate approach, given the shape of the non-domestic CoT issue.	Thank you for your response.
Utilita (Energy Supplier)	We agree this change will improve reporting and compliance for the non-domestic change of tenancy process.	Thank you for your response.

Question 8:	Do you have any other comments relating to this Issue?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	No	Thank you for taking the time to respond to this impact assessment.
Drax Group plc (Energy Supplier)	We have no further comments.	Thank you for taking the time to respond to this impact assessment.
E.ON Next (Energy Supplier)	No Further comments	Thank you for taking the time to respond to this impact assessment.
ScottishPower Energy Retail Limited (Energy Supplier)	We take note of the Code Manager's point that the PARC extract referenced in the consultation document is hypothetical. As noted in our response to Q3, we believe that the frequency and timing of R0155 reporting should be aligned with those of the Ofgem Non-Domestic Market Monitoring RFI. Aligning these timelines would serve to minimise the administrative burden on suppliers, avoiding duplication of	Thank you for your response. The Code Manager ensure any required PARC text is available for the consultation stage of the Change Process.

	efforts and enabling more efficient allocation of resources. We look forward to the opportunity to engage with the Code Manager and interested parties on the development of the PARC text to ensure that the final design is both practical and proportionate.	
Utilita (Energy Supplier)	No further comments.	Thank you for taking the time to respond to this impact assessment.