RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0285 ORGANISATIONS WITH MULTIPLE ROLE TYPES EES AND SDEP ACCESS

On 31 July 2026 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0285 Organisations with multiple role types EES and SDEP access.

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
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RESPONSIBLE COMMITTEE	Technical Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	31 July 2026
RESPONSE DEADLINE	28 August 2026

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. Although this change does not directly affect us, the proposed solution makes sense and would likely be a welcome resolution to any parties experiencing the inconvenience.	Thank you for your comments.
British Gas (Energy Supplier)	**Position: British Gas supports the proposed solution.** British Gas does not expect the proposed solution to have a direct impact on its systems or processes. However, the solution should benefit Parties operating multiple REC role types by: • allowing authorised users to access multiple company groups through a single account; • reducing the need to maintain multiple email addresses and accounts; and • simplifying user access administration. The proposed solution should reduce administrative overheads and improve the user experience while maintaining appropriate access controls.	Thank you for your comments.
E.ON Next (Energy Supplier)	We fully support the introduction of the new organisational hierarchy level and the Single Email Address (SEA) functionality. Introducing an	Thank you for your comments.

	Organisation MAU to streamline access and manage company groups while maintaining role switching is a logical and necessary update.	
SSE Energy Supply (Energy Supplier)	SSE has no issue with the proposed solution.	Thank you for your comments.
ENGIE (Energy Supplier)	We feel this change needs more justification given the high level of cost and we are uncertain that the benefits are justified by the cost.	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.	Thank you for your comments.
British Gas (Energy Supplier)	**Position: Yes, British Gas agrees that the proposed solution addresses the problem statement.** The proposed solution directly addresses the current requirement for a user to maintain separate email addresses and accounts when the user requires access to multiple company groups within the same organisation.	Thank you for your comments.
E.ON Next (Energy Supplier)	Yes, we agree.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes.	Thank you for your comments.
ENGIE (Energy Supplier)	The solution addresses the problem statement but we do not feel the cost/benefit has been fully justified in the proposal to date.	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)	Not that we are aware of at this stage.	Thank you for your comments.
British Gas (Energy Supplier)	**Position: No alternative solution has been identified.** The proposed solution appears proportionate and directly addresses the access and administration issue described in the problem statement.	Thank you for your comments.
E.ON Next (Energy Supplier)	No, The hierarchical model with an Organisation MAU represents the most robust structure. Crucially, the inclusion of system-level configuration to restrict specific incompatible company group combinations ensures the solution is future-proof and compliant with regulatory ring-fencing or licensing conditions.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We do not have sufficient knowledge to determine if there is a better solution.	Thank you for your comments.
ENGIE (Energy Supplier)	We do not have an alternate solution to propose at this stage but would like to see clearer justification of the £100k spend proposed.	Thank you for your comments.

Question 4:	Do you think we have identified and considered all processes and scenarios that may be impacted through the implementation of the proposed change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We believe so.	Thank you for your comments.
British Gas (Energy Supplier)	**Position: British Gas has not identified any additional affected processes or scenarios.** British Gas does not expect the proposed solution to affect its systems or processes. We therefore have no additional impacts or scenarios to raise.	Thank you for your comments.
E.ON Next (Energy Supplier)	Yes	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We are unaware of any further scenarios impacted by this change.	Thank you for your comments.
ENGIE (Energy Supplier)	The high cost has not been fully broken down or justified. We also do not feel that the interaction of the proposal with corporate internal control regimes has been discussed, for example whether it is necessary or even desirable that employees from different roles can access each other's data. This might limit the usage and therefore value of the proposal. It is already limited by the fact that supplier and DNO roles must be kept separate and cannot share staff, as acknowledged in the consultation document.	Thank you for your comments. The Service Provider cost will not be broken down any further than the total cost, as it would require confidential information (such as rate cards) being made public.

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. (Although paragraph 14.5 of the SDES Definition draft document begins with an equals sign so flagging in case this is an error.)	Thank you for your comments. This has been corrected.
British Gas (Energy Supplier)	**Position: British Gas has no comments on the proposed legal text.**	Thank you for your comments.
E.ON Next (Energy Supplier)	No, they appear appropriate and accurately reflect the technical requirements of the organisational hierarchy.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.
ENGIE (Energy Supplier)	No.	Thank you for your comments.

Question 6:	Do you think it is appropriate to implement the solution before completion of the Enquiry Services Evolution Project, or do you think this should wait until after the anticipated completion date of July 2028 – noting that if implemented before this date, the change would be paid for twice (once from the REC Change budget, and once from the Enquiry Services Evolution Project budget)?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Given what is likely to be a short timeframe between the implementation of this change (bearing in mind the 25-week period required to design/build/test) and the anticipated completion of the Enquiry Services Evolution Project, we would question whether the inefficiencies, unnecessary administrative burdens and poor user experience described within the Problem Statement are severe enough to warrant the need for this change to be paid for twice (especially as the cost is a significant amount). At this stage, we are not aware of any party feedback that specifically supports the need for this change to be implemented prior to July 2028 and which successfully identifies an industry need that justifies doubling the implementation costs, therefore we do not think it would be appropriate for the solution to be implemented before completion of the Enquiry Services Evolution Project.	Thank you for your comments.
British Gas (Energy Supplier)	**Position: British Gas supports implementation before July 2028 only where REC can demonstrate that the benefits outweigh the additional costs and potential duplication with the Enquiry Services Evolution Project.** British Gas recognises that the proposed solution could benefit Parties operating multiple REC role types. However, implementation before completion of the Enquiry Services Evolution Project could result in	Thank you for your comments.

	similar functionality being funded through both the REC Change Budget and the Enquiry Services Evolution Project budget. The key considerations are: • the number of Parties expected to use the functionality; • the scale of the administrative benefits before July 2028; • whether the benefits justify funding the solution before completion of the Enquiry Services Evolution Project; and • whether any elements of the solution can be reused to minimise duplicate investment. British Gas recommends that the Code Manager provides evidence that the anticipated benefits before July 2028 will outweigh the additional costs. Subject to that evidence, British Gas would not object to implementation before completion of the Enquiry Services Evolution Project.	
E.ON Next (Energy Supplier)	As an Energy Supplier and MEM, we are highly sensitive to industry costs. Given that early implementation requires paying for the change twice (from both the REC Change and ESEP budgets), we advocate waiting until the ESEP is completed in July 2028 unless a clear, quantified cost-benefit analysis demonstrates that immediate operational savings across the industry outweigh the redundant technical spend. Protecting the industry budget from double-funding should be a priority.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We do not feel this change is of such urgency that would warrant the cost being met twice.	Thank you for your comments.

ENGIE (Energy Supplier)	We do not think it is appropriate to implement this change before completion of the Enquiry Services Evolution Project and paying twice for it should be avoided. It may also be that after completion of the project the cost/benefit analysis may have changed so it is better to postpone any decision until then.	Thank you for your comments.

Question 7:	Are you aware of any constraints (other than the Enquiry Services Evolution Project) on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No.	Thank you for your comments.
British Gas (Energy Supplier)	**Position: No.** British Gas has not identified any delivery constraints other than the dependency on the Enquiry Services Evolution Project described in the consultation.	Thank you for your comments.
E.ON Next (Energy Supplier)	No.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.
ENGIE (Energy Supplier)	No.	Thank you for your comments.

Question 8:	Do you foresee any risks to your qualification or migration plans to be delivered as part of MHHS implementation 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.
British Gas (Energy Supplier)	**Position: No.** British Gas does not foresee any risks to its MHHS qualification or migration plans arising from implementation of the proposed solution.	Thank you for your comments.
E.ON Next (Energy Supplier)	No.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.
ENGIE (Energy Supplier)	No.	Thank you for your comments.

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)	We would not be directly impacted by this change so we would not incur any costs if the solution was to be implemented.	Thank you for your comments.
British Gas (Energy Supplier)	**Position: A) Nil.** British Gas's internal assessment has identified no impact on its systems or processes. British Gas therefore anticipates no design, build, testing or ongoing costs.	Thank you for your comments.
E.ON Next (Energy Supplier)	Since the changes are restricted to the central SDEP and ECOES portal configurations, we do not anticipate any direct software design or build costs. Our costs will be limited to internal administrative time to set up the Organisation MAUs and minor training for operational staff.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	A) Nil	Thank you for your comments.
ENGIE (Energy Supplier)	The direct costs to our business would be low, but the overall cost to industry of implementing this change, especially at this time, is significant.	Thank you for your comments.

Question 10:	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)	N/a.	n/a
British Gas (Energy Supplier)	**Position: No implementation lead time is required.** British Gas does not anticipate undertaking any implementation activities because the proposed solution has no identified impact on its systems or processes.	Thank you for your comments.
E.ON Next (Energy Supplier)	We require a lead time of 1 to 2 months. This duration is necessary to run internal training sessions for operational staff, designate and configure our Organisation MAU, map our existing company groups to the new hierarchy, and update internal security and access management policies.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No lead time required.	Thank you for your comments.
ENGIE (Energy Supplier)	Whilst not commenting on its merits, this does not seem like a change that would be onerous to implement.	Thank you for your comments.

Question 11:	Do you identify any benefits to your business or the energy market through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No.	Thank you for your comments.
British Gas (Energy Supplier)	**Position: British Gas identifies potential benefits for affected Parties, but no direct benefit to British Gas.** Potential benefits for affected Parties include: • fewer email addresses and user accounts to maintain; • simpler user administration; • easier access to authorised company groups; and • an improved user experience. These benefits should reduce administrative complexity for organisations operating multiple REC role types while retaining access controls for role-specific data.	Thank you for your comments.
E.ON Next (Energy Supplier)	Yes. Implementing the proposed solution will deliver substantial benefits to our business and the broader energy market. Primarily, it will significantly enhance operational efficiency by eliminating the tedious requirement for dual-role back-office staff to repeatedly log out and log back in with separate credentials. Furthermore, the solution strengthens security and compliance through centralised control via the	Thank you for your comments.

	Organisation Master Admin User (MAU), which will improve overall password hygiene and simplify audit trails.	
SSE Energy Supply (Energy Supplier)	This change has no benefits to SSE, and we would need to understand how big an issue it is nationally to determine the industry wide benefits.	Thank you for your comments.
ENGIE (Energy Supplier)	There may be some administrative benefits for parties operating in multiple roles if they choose to use the functionality but more information is needed on cost/benefit to justify this change.	Thank you for your comments.

Question 12:	Do you have any comments on the Service Provider impact assessment output? Specifically, do you think the cost is appropriate for the proposed solution and foreseen benefits?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We will not see any benefits from the implementation of the proposed solution so would be unable to comment. Please also see our response to Q13 below.	Thank you for your comments.
British Gas (Energy Supplier)	**Position: British Gas cannot confirm that the estimated implementation cost represents value for money without further evidence of expected uptake and benefits.** British Gas has no evidence to challenge the Service Provider's estimated implementation cost of £106,231 or the associated delivery timescale. However, the consultation does not quantify: • the number of Parties expected to use the functionality; • the number of users expected to benefit; • the scale of the current administrative burden; or • the operational efficiencies expected from implementation. Without this information, REC Parties cannot fully assess whether the proposed expenditure is proportionate to the benefits. British Gas recommends that the Code Manager provides additional evidence of expected uptake and the benefits anticipated to be delivered by the proposed solution. This evidence is needed to demonstrate that the estimated implementation cost represents value for money for REC	Thank you for your comments. As this is the impact assessment rather than the consultation stage, the Code Manager is asking Parties at this stage whether they expect to use this functionality. This will be provided at the consultation stage but is contingent on Parties confirming this to the Code Manager. The Code Manager cannot confirm the administrative burden or operational efficiencies without Parties confirming this for us.

	Parties, including Parties that will fund the change but do not expect to use the functionality.	
E.ON Next (Energy Supplier)	The central development cost of £106,231 and a timeline of 127 days (~25 weeks) seem reasonable given the structural database changes required to support a new multi-role identity hierarchy. However, this substantial cost further reinforces our view under Q6 that RECCo should avoid double-spending this budget ahead of the ESEP transition in July 2028.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	With the information we have we do not feel the cost is and the time taken to implement is appropriate for the proposed solutions. However, as this change has little impact on our business, we would like to see an Information Request to determine the size of this issue and, if sufficiently large, we would be more inclined to support this change.	Thank you for your comments. This impact assessment was the chance for Parties to respond and provide this information. This negative impact was identified by IGTs who are also IDNOs during the development of R0162. They identified as they use the same operational staff across both areas of their business, it would be cumbersome to have to maintain two email addresses for their staff (plus play the extra licence costs for those extra email addresses). Assuming this stance is taken by all IGTs who are IDNOs, that is around half of GTs in the market. The Code Manager believes this would also impact MOAs who are also Energy Suppliers, if MOAs were provided access to SDEP.

ENGIE (Energy Supplier)	We do not feel that the cost/benefit argument for this change has been fully made – the costs are clear but the financial benefits (through cost savings) are not and there has been no analysis of how or whether parties would use this change based on their internal control frameworks.	Thank you for your comments. The cost/benefit argument has not yet been made as this as impact assessment stage, not consultation. The Code Manager requires the output of this impact assessment to conduct the cost/benefit analysis.

Question 13:	Taking into consideration both the costs and the benefits seen, do you consider this change should be made?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We would be interested in learning more about the extent of the negative impact that this issue is having on parties, seeing as though we are not affected. We would then feel better placed to comment on whether the benefits justify the one-off cost of £106,231.	Thank you for your comments. This negative impact was identified by IGTs who are also IDNOs during the development of R0162. They identified as they use the same operational staff across both areas of their business, it would be cumbersome to have to maintain two email addresses for their staff (plus play the extra licence costs for those extra email addresses). The Code Manager believes this would also impact MOAs who are also Energy Suppliers, if MOAs were provided access to SDEP.
British Gas (Energy Supplier)	**Position: British Gas supports the proposed change in principle, provided REC demonstrates that the benefits outweigh the costs and the risk of duplicate investment is minimised.** British Gas does not currently expect to use the functionality. However, the proposed change should: • remove administrative complexity for organisations operating multiple REC role types;	Thank you for your comments.

	• simplify access management for Parties with multiple company groups; and • improve the user experience while maintaining appropriate access controls. The main value-for-money considerations are: • the estimated implementation cost; • the expected number of Parties and users that will benefit; • the operational efficiencies delivered; and • the potential overlap with the Enquiry Services Evolution Project. British Gas recommends that the Code Manager provides additional evidence that the expected uptake and operational benefits justify the costs funded by REC Parties. The Code Manager should also consider how the proposed solution will align with the Enquiry Services Evolution Project to minimise duplicate investment. **Subject to this evidence, British Gas supports implementation of the proposed change.**	
E.ON Next (Energy Supplier)	Yes, the change should be made because it resolves a clear and growing operational pain point. However, implementation timing must be managed efficiently to avoid unnecessary budget duplication.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Not with the information we have.	Thank you for your comments.

ENGIE (Energy Supplier)	Based on the cost/benefit analysis provided to date, we do not believe this change should be made, and it should not be made prior to the completion of the Enquiry Services Evolution Project.	Thank you for your comments.

Question 14:	If implemented, would your organisation use the functionality provided by I0285 (e.g. have a User assigned to more than company group role within SDEP)?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No.	Thank you for your comments.
British Gas (Energy Supplier)	**Position: No, British Gas does not currently expect to use the functionality.** British Gas does not currently require a user to access multiple company groups associated with different REC role types.	Thank you for your comments.
E.ON Next (Energy Supplier)	Yes. Once MEMs have access to the SDEP.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.
ENGIE (Energy Supplier)	The answer to this question for organisations will depend upon their internal control approaches for common access to systems across different parts of their groups. It is far from certain that shared access will be appropriate in all circumstances (and it is already clear that it is not appropriate for Suppliers and DNOs), which could limit the value of this proposal.	Thank you for your comments. The Code Manager will assume ENGIE is not planning on using this functionality.

Question 15:	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
British Gas (Energy Supplier)	**Position: British Gas has no further comments.**	n/a
E.ON Next (Energy Supplier)	We recommend that the Code Manager provides clear, early guidance and step-by-step user guides for the newly introduced Organisation MAU role. This will ensure that organisations can migrate their existing separate company groups smoothly once the system goes live.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No.	n/a
ENGIE (Energy Supplier)	No.	n/a