RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	Final Recommendation

CHANGE REPORT

I0286 – CLARIFICATION ON DETAILED IMPACT ASSESSMENT ACTIVITIES

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	TBD
IMPLEMENTATION APPROACH	TBD

RESPONSIBLE COMMITTEE	CHANGE PANEL	CHANGE PATH	SELF-GOVERNANCE
PRIORITY STATUS	LOW	URGENCY	STANDARD
IMPACTED STAKEHOLDERS	ALL REC PARTIES AND ALL SERVICE PROVIDERS		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	ASSURANCE LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

This Issue seeks to formalise the Responsible Committee's approval of a change to release funds for the lead Service Provider to complete design upfront as part of the preliminary impact assessment (PIA).

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BACKGROUND

1 SUMMARY

The first complex technical change, R0067 – Introduction of CSS Refresh Functionality, encountered a few challenges within the design and implementation process. This change was scheduled for implementation on 06 December 2023. However, it was deployed with defects and was not fully operational until February 2024. Following that session, the Code Manager held discussions, and a formal “lessons learned" session with all Service Providers and identified several challenges with the technical change process.

This approach was initially trialled with R0080 - Improvements to ‘Failed to Deliver’ CSS Messages. The recommendation was completed by the Technical Design Authority (TDA). Views sought from the Technical Expert Panel (TEP) and RECCo approved the release of funds for the Service Provider to complete the design as part of the PIAs. The detailed design documents were then able to be shared with industry following the completion of the Detailed Impact Assessment (DIA) and prior to the Party impact assessment stage, which highlighted several clarifications required within the design. This enabled the documents to be updated in advance of approval and ensure that the design was fit for purpose across the industry. The full Change Proposal has subsequently been approved and was implemented in June 2025.

2 PROBLEM STATEMENT

The technical change process currently creates five challenges which can be attributed to the timing of the detailed design, PIA and DIAs. These are as follows:

1. Lack of Clarity

Where Service Providers and impacted Parties are dependent on each other, it is difficult for them to properly impact assess a change when there is no clarity on the design at the point of a DIA and when PIAs are issued.

2. Limited Feedback

Where design happens post a change being approved, there is no formal opportunity for impacted stakeholders to provide feedback and amends for the design to ensure that it meets their needs.

3. Misalignment

Where designs are not shared early, assumptions can be made by all impacted Parties, this can be discovered late in the development phase which may cause rework and or delays to testing or deployment.

4. High Contingency Costs

Where there is uncertainty over design, Service Providers built in a high degree of contingency costs to ensure they have sufficient commercial coverage when completing a DIA.

5. Inaccurate Timelines

Completing an end-to-end implementation timeline as part of a DIA without having certainty on design can result in longer timelines being provided, lengthening the change process overall.

3 IMPACTS

CONSUMERS	REC SERVICE PROVIDERS	RECCO / REC CODE MANAGER
All Consumers	All Service Providers	REC Code Manager

REC PARTIES AND SERVICE USERS	REC DOCUMENTS / PRODUCTS
All REC Parties	Schedule 5 – Change Management

MHHS
No MHHS issue has been identified by the Code Manager.
The benefits gained through the additional clarity would be expected to be similar for the Data Integration Platform (DIP) Manager and DIP Service Provider similarly to other Service Providers.

4 CROSS-CODE IMPACTS

No Cross-Code Impact has been identified by the Code Manager.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**01 Dec-25**	**28 Feb-26**
	Solution Analysis	Completed	Completed
	Solution Development	December	February
	Legal Drafting and Review	December	February
Change Proposal		**01 Mar-26**	**20 April-26**
	Business Case Assessment	March	March
	Consultation	March	March
	Final Determination	April	April
Voting		**21 Apr-26**	**21 Apr-26**
	Appeal Window	22 April	06 May 2026

This Proposal Plan does not include a Party impact assessment because there are no impact or operational changes required by REC Parties. REC Parties will be able to engage and submit views as part of the industry consultation that is expected to be issued in March 2026.

6 STAKEHOLDER ENGAGEMENT

The Code Manager is planning to engage with the Change Issues Group as and when appropriate throughout the development of this Issue.

Throughout the progression of this Issue, the Code Manager will remain informed about possible changes to the approach in line with Energy Code Reform.

7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	1	27	27
	Retail Markets Impact	Innovation and Market Arrangements	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	7	7
		Legal and Regulatory Compliance	0	14	0
Resource	Complexity / Effort / Duration		3	9	28
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		1		8
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	0	10	0
				Overall Priority Score (rounded)	94

Priority Status	LOW
Change Proposal Type	STANDARD

The Code Manager has given this Issue a low urgency score based upon a weighted priority score of 94.

SOLUTION

8 PROPOSED SOLUTION

The Code Manager is proposing a new approach with the lead Service Provider completing design up front as part of the PIA. The decision to undertake design will be based on the level of complexity of the change and the strength of the business case. The changes will be assessed on a case-by-case basis, if the change is a suitable candidate for design as part of the PIA, a TDA recommendation will be created. This will then be presented to the Responsible Committee for approval to release the funds for design as part of the PIA. Where the committee does not approve the release of funds, the change will continue down the standard change route and design will be completed following the approval of the full Change Proposal.

To enable this new approach, the Code Manager will update the REC Schedule 5 – Change Management.

PRELIMINARY ASSESSMENT

9 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

No risks, assumptions, issues and dependencies have been identified by the Code Manager at this stage.

10 APPENDIX

CHANGE PROPOSAL	Link
RELATED CHANGES	R0067 –Introduction of CSS Refresh Functionality R0080 - Improvements to 'Failed to Deliver' CSS Messages

11 GLOSSARY

TERM	DEFINITION
Centralised Registration Service (CRS)	means the services provided pursuant to Condition 15 (Incorporation, delivery and provision of the Centralised Registration Service) of the DCC Licence, being the services provided under this Code by the CSS Provider, Switching Operator, CSS Certificate Authority and, until the end of the Post Implementation Period only, the Core Systems Assurance Provider and the CSS Systems Integrator.
Central Switching Service (CSS)	means the Systems and processes provided or procured by the CSS Provider for the purpose of providing the Address Management Service and the Registration Service.
Change Proposal	means a proposal to change this Code made in accordance with Clause 11 of the main body of this Code or the Change Management Schedule.
Data Integration Platform (DIP)	means the data integration platform made available pursuant to the BSC.
DIP Manager	means BSCCo or such other entity as is responsible under the BSC for managing the Data Integration Platform.
Party	means, from time to time, an Original Party or a New Party that has not at that time ceased to be a Party in accordance with Clause 17 of the main body of this Code.