RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

REC ISSUE SUBMISSION FORM (COPY)

1 PERSONAL DETAILS

PROPOSER NAME *(Mandatory)*	Abeda Patel
COMPANY *(Optional)*	SQE Energy
COMPANY TYPE *(Optional)*	Energy Supplier
TELEPHONE NUMBER *(Optional)*	
EMAIL ADDRESS *(Mandatory)*	abedapatel@sqe.energy

2 ISSUE SUMMARY

ISSUE TITLE *(Mandatory)*	Regulatory Alliance Creation Rejections
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	Gaps or inconsistent interpretations of the process for creating a Regulatory Alliance within the REC can cause issues for DNOs, Energy Suppliers and the Consumer.
WHAT IMPACT IS THIS HAVING? *(Mandatory)*	The gaps or interpretation inconsistency with the Regulatory Alliance creation process have caused unnecessary delays for Energy Suppliers entering the market which have directly impacted a small number of Consumer Switches.
WHAT DO YOU CONSIDER TO BE AN EFFECTIVE SOLUTION? *(Mandatory)*	Full review of the REC legal text, service providers and central system obligations to ensure that all gaps and inconsistencies are resolved. It is recommended this review also includes the MDD / ISD process setting up new MPIDs, the DCUSA legal text regarding Regulatory Alliances, CSS rejections and SLAs on each step.

IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE ISSUE THAT WOULD BE USEFUL? *(Optional)*	There have been two incidents where Switches have been attempted and did not occur as the Regulatory Alliance was not set up in time by various ERDAs. The ERDA attempted to set up the Regulatory Alliance and it was rejected by the CSS, with no mechanism for how this rejection should work or be communicated specified within the REC.
DOES THIS ISSUE RELATE TO AN EXISTING ISSUE RAISED OR AN EXISTING CHANGE PROPOSAL? IF SO, PLEASE PROVIDE DETAILS OF THE ISSUE OR CHANGE PROPOSAL.	n/a

3 CONSUMER IMPACTS

WHICH CONSUMER TYPES WILL BE IMPACTED BY THIS ISSUE? *(Mandatory)*	☒ All ☐ Electricity ☐ Gas ☐ Domestic Prepayment ☐ Domestic Credit ☐ Microbusiness ☐ Small and Medium Enterprise (SME) ☐ Industrial and Commercial (I&C) ☐ Other (please specify in the Additional information box below)
WHAT IMPACT WILL THIS ISSUE HAVE FOR THESE CONSUMERS? *(Mandatory)*	☒ Switching experience ☐ Billing accuracy ☒ Trust and confidence ☐ Safety ☐ Security of supply ☐ Ability to pay ☐ On site experience ☐ Achieving Net Zero ☐ Other (please provide details in the Additional information box below)
ADDITIONAL INFORMATION *(Optional)*	

DOES THIS ISSUE CONTRIBUTE TO THE ACHIEVEMENT OF NET ZERO? *(Mandatory)*	
ADDITIONAL INFORMATION *(Optional)*	

4 CODE IMPACTS

Does this Issue relate to or impact:

THE REC OR REC SCHEDULES? *(Optional)*	☐ Main Body ☐ Schedule 1 - Interpretations and Definitions Schedule ☐ Schedule 3 - Accession Agreement ☐ Schedule 4 - Company Governance ☐ Schedule 5 - Change Management ☐ Schedule 6 - Performance Assurance ☐ Schedule 7 - Energy Theft Reduction ☐ Schedule 8 - Unbilled Energy Code of Practice ☒ Schedule 9 - Qualification and Maintenance ☐ Schedule 10 - Charging Methodology ☐ Schedule 11 - Prepayment Arrangements ☐ Schedule 12 - Data Access ☐ Schedule 13 - Transfer of Consumer Data ☐Schedule 14 - Metering Operations ☐ Schedule 15 - Metering Accreditation ☐ Schedule 17 - Secure Data Exchange ☐ Schedule 18 - Green Deal Arrangements ☐ Schedule 19 - Market Exit and Supplier of Last Resort ☐ Schedule 22 - Market Stabilisation Charge ☐ Schedule 23 - Registration Services ☒ Schedule 24 - Switching Data Management ☐ Schedule 25 - Central Switching Service ☒ Schedule 26 - Switching Service Management ☐ Schedule 27 - RMP Lifecycle Schedule ☐ Schedule 28 - Related Metering Points

	☐ Schedule 29 - Address Management ☐ Schedule 30 - Resolution of Consumer Facing Switching and Billing Issues ☐ Schedule 31 – Prepayment Method Levelisation Reconciliation ☐ Schedule 32 - Electricity Supply to Hydrogen Electrolysers ☐ Schedule 33 - Non Domestic Change of Occupier ☐ Schedule 34 - Migration Schedule
ADDITIONAL INFORMATION *(Optional)*	Qualification Schedule flagged if new steps are required

OPERATIONAL DOCUMENTS *(Optional)*	☐ Consolidated Metering Code of Practice (CoMCoP) ☐ Cross Code Steering Group Terms of Reference ☐ Performance Assurance Board Terms of Reference ☒ Performance Assurance Report Catalogue ☐ REC Change Panel Terms of Reference ☐ Smart Meter Installer Domestic Customer Survey ☐ Smart Meter Installer Microbusiness Customer Survey
ADDITIONAL INFORMATION *(Optional)*	PARC flagged in case monitoring of SLAs is required

SERVICE SPECIFICATION *(Optional)*	☒ Central Data Service Provider Further Services Service Definition ☒ Central Switching Service Definition ☒ CSS Certificate Authority Service Definition ☐ Electricity Enquiry Service - Service Definition ☒ Electricity Retail Data Service Definition ☐ Gas Enquiry Service Definition ☒ Gas Retail Data Service Definition ☐ Green Deal Database Service Definition ☐ Secure Data Exchange Service Definition ☐ Switching Operator Service Definition
ADDITIONAL INFORMATION *(Optional)*	

API TECHNICAL SPECIFICATION *(Optional)*	☐ EES API Technical Specification ☐ GES Meter Asset Enquiry API Technical Specification ☐ GES Supply Point Switching API Technical Specification ☐ GES Supply Point Enquiry API Technical Specification
ADDITIONAL INFORMATION *(Optional)*	

THE DATA SPECIFICATION *(Optional)*	☐ Data Access Matrix ☒ Data Item Catalogue ☒ Market Message Catalogue ☐ Standards Definition ☐ Supply Number Format
ADDITIONAL INFORMATION *(Optional)*	

CENTRAL SYSTEMS OR REC SERVICES? *(Optional)*	☒ Central Data Service Provider Further Services ☒ Central Switching Service (CSS) ☒ CSS Certificate Authority ☐ Electricity Enquiry Service ☒ Electricity Retail Data Service ☐ Electricity Theft Tip Off Service ☐ Gas Enquiry Service ☒ Gas Retail Data Service ☐ Green Deal Central Charging Database ☐ Secure Data Exchange Service ☐ Switching Operator
ADDITIONAL INFORMATION *(Optional)*	

REC PARTIES AND/OR MARKET PARTICIPANTS? *(Optional)*	☐ AMR Service Providers ☐ Data Aggregators ☐ Data Collectors ☐ Data Services ☐ Smart Meter Data Retrievers ☐ DCC ☒ Distribution Network Operators

	☒ Energy Suppliers ☐ EES Users ☒ Gas Transporters ☐ GDCC Users ☐ GES Users ☐ Green Deal Finance Parties ☐ Green Deal Providers ☐ Meter Asset Providers ☐ Metering Equipment Managers ☐ Shippers ☐ Third Party Intermediaries ☐ Virtual Lead Party ☐ Other (please provide details in the Additional Information box)
ADDITIONAL INFORMATION *(Optional)*	

OTHER INDUSTRY CODES? *(Optional)*	☒ Balancing & Settlement Code (BSC) ☒ Distribution Code Use of System Agreement (DCUSA) ☐ Smart Energy Code (SEC) ☒ Uniform Network Code (UNC) ☒ Independent Gas Transporter Uniform Network Code (IGT UNC) ☐ Data Integration Platform (DIP) Rules
ADDITIONAL INFORMATION *(Optional)*	Note that Regulatory Alliance is also set out in DCUSA and UNC so checks required to make sure cross code impacts are considered. BSC to be included if ISD/MDD changes are required.

DOES THIS ISSUE IMPACT A SIGNIFICANT CODE REVIEW? *(Optional)*	No
ADDITIONAL INFORMATION *(Optional)*	

5 ISSUE PROGRESSION

DO YOU BELIEVE THIS ISSUE PROPOSAL MEETS THE CRITERIA FOR 'URGENCY' AND SHOULD BE PROGRESSED UNDER AN URGENT TIMETABLE? **IF SO, PLEASE PROVIDE JUSTIFICATION?** *(Optional)*	No
SDS ALIGNMENT - HOW CLEARLY THE CHANGE SUPPORTS OFGEM'S STRATEGIC DIRECTION STATEMENT AND HELPS DELIVER SDS PRIORITIES/OUTCOMES. *(Mandatory)*	Medium – as enhances market fairness. Links to objective 2.1 "Improve protection for all consumers, particularly those in vulnerable situations" as impacts Consumer Switching and Objective 3: Enable competition and investability through financial resilience
IMPORTANCE - THE SIGNIFICANCE OF THE BENEFITS OR RISKS ADDRESSED (E.G., CONSUMER OUTCOMES, COMPLIANCE/LEGAL RISK, SYSTEM/OPERATIONAL IMPACTS, MARKET FAIRNESS). *(Mandatory)*	Medium– impacts consumer outcomes and market fairness as delays new market entrants and delays consumers switching to them Objectives 2 & 3
COMPLEXITY/ DELIVERY CONSIDERATIONS - HOW CHALLENGING IT IS TO DEVELOP AND IMPLEMENT (E.G., SCALE OF CHANGE, STAKEHOLDER ENGAGEMENT REQUIRED, SERVICE/SYSTEM IMPACTS, CROSS-CODE DEPENDENCIES, DELIVERY/TESTING RISK). *(Mandatory)*	Expected medium to low complexity but it depends on the final solution. Note potential cross-code dependencies as mentioned above
ARE THERE ANY REQUIRED TIMESCALES FOR THE DEVELOPMENT OF THIS ISSUE? *(Optional)*	No but recognise the impact on new market entrants so recommend it is resolved as quickly as possible including looking at temporary solutions.

ARE THERE ANY REQUIRED TIMESCALES FOR THE IMPLEMENTATION OF THIS ISSUE? *(Optional)*	n/a
ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THIS ISSUE WHICH MAY IMPACT ITS PRIORITY OR PROGRESSION TIMETABLE? *(Optional)*	n/a

6 ATTACHMENTS

ATTACH/PROVIDE ANY SUPPORTING DOCUMENTS TO BE SUBMITTED WITH THE FORM	