QUESTION	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
Do you agree with the Proposed Solution? If not, please explain why.	**Ovo** Energy Supplier	Reports required from SDES, CSS – fine with the proposed change insofar as there is minimal impact on suppliers. However, concerns that the justifications for requesting these reports are not sufficiently provided. Changes to Energy Supplier reports – these are large changes to reporting and billing systems that would have a significant impact and be of a high cost. We would need to make changes to multiple billing systems and begin to collect data which is currently not retrieved or stored. Due to the high volume of changes that we are currently managing, the resource to facilitate this change would be unavailable in the near term. There is also, as with SDES and CSS reports, low/no justification for the proposal. We therefore cannot support this change.	Following Impact Assessment, further details on the justification for change in addition to the explanation of changes to reports 1430 and 1440, was provided in the Preliminary Change Report: *The addition of new reporting to facilitate Parties providing exemption reports for the data quality items, that are being carried over from the Switching Programme Data Working Group. This is necessary to avoid a 'step change' in reported exceptions and Parties being expected to resolve items previously exempt. This data is requested at a Meter Point level to allow Performance Assurance to track exemptions more clearly.* *Amendments to reports 1430/1440 – these changes have been made based on feedback from multiple Parties, primarily those serving non-domestic customers. This included concerns around;* • *providing the duration of fixed length contracts for all non-domestic switches* • *the risk that bulk switches could distort analysis; and* • *providing additional valid values for existing fields to better match typical non-domestic processes.* We acknowledge that the PARC changes may result in system changes being required by Energy Suppliers. If any Energy Supplier is concerned about their ability to deliver the required changes in line with the implementation date (noting the transition

			arrangements incorporated as part of the response to the consultation) the Party may wish to submit a suitably justified derogation application.
	Scottish Power Energy Supplier	We agree with the proposed solution for CSS and CDSP reporting. We fundamentally disagree with the process followed that has resulted in the proposed changes to existing reporting.	The Change Proposal R0028 re-categorised the PARC from a Category 3 to a Category 2 document. This was in response to Industry challenge to ensure future changes to the PARC followed the standard change process which included key industry assessment and engagement activity. This Change Proposal (R0038) has progressed the changes to the PARC via the formal change process including a Party Impact Assessment, and consultation. Following feedback on the Impact Assessment time was allowed in the existing planned webinar on the 26 May where this Change Proposal was presented. This provided a further opportunity for Parties to engage, this was in addition to the standard engagement points through the REC Change Process.
	Drax Group Energy Supplier	We agree with the proposed solution for CSS and other centrally provided reporting data. We appreciate the willingness of the Code Manager to engage on the existing reports, and we support the changes to the gaining supplier report (#1430) that make it more relevant to non domestic switches. The optional addition of a Bulk Switch Identifier should help to mitigate the risk of distorted analysis resulting from the inability to distinguish between a large number of individual customers switching single sites from one customer switching a large multi-site group. We don't agree that the addition of the "Early Contract Exit" data item in the losing supplier report (#1440) is a necessary change. There are multiple reasons why a customer might exit a fixed contract early, so this is not necessarily an indication of dissatisfaction or detriment. This is particularly true in the non-domestic market where a	We appreciate the recognition of positive engagement on aspects of this change. In respect of the 'Early Contract Exit' we agree that there will be valid cases for an early contract exit. We do not intend to assume all such exits represent dissatisfaction or detriment. However, there are extremely limited options for direct measurement of customer dissatisfaction or detriment, and we believe that measuring early exit of fixed term contracts can provide useful data in the following two ways: • Measuring the overall level of early exits relative to portfolio and switching activity and identifying parties with outlier levels of exits

		supplier might request that a customer switches away if, for example, they cease to run a business from the premises supplied. Furthermore, the short objection window being introduced alongside Faster Switching could mean that a customer switched early because the supplier simply didn't object in time.	Using early exit data at a meter point level in conjunction with other activity as an indication of the extent and significance of customer dissatisfaction.
	Utilita Energy Supplier	No, we remain with the opinion that changes to the supplier data items in the Performance Assurance Reporting Catalogue (PARC) have been progressed in this change proposal without consideration for all supplier views (domestic and non-domestic alike). We, therefore, suggest that all the new supplier data item changes are completely optional for the supplier to amend in any PARC reporting until general views from suppliers have been sought. We are not satisfied that supplier views (who responded) to the Impact Assessment have been taken under any consideration, as one supplier even highlighted that the title of this change doesn't fit the full description. Not all supplier data item changes are in preparation for REC v3.0, but instead are only fitting the needs of a select number of supplier views.	There are three supplier items with changes included in the proposal. Of these: • Two (1430 / 1440) have been made in response to feedback, primarily from non-domestic suppliers. The changes were designed in such a way that for domestic suppliers if not relevant they would require limited change (e.g. the bulk switch indicator field would need to be added but if a domestic supplier never performs bulk switches then as an option field no data need be populated). The one change requiring data to be provided (early exit indicator in 1440) was developed based on the feedback from non-domestic parties regarding the option to avoid providing the fixed contract length in report 1430 but also reflected feedback previously received from domestic parties regarding reducing the amount of data collected and therefore moved to an 'on event' basis. • One (1810 – Data Cleanse Exemption Report) was included based on feedback received from the switching Data Working Group which has representation from a large number and range of suppliers.

			The Code Manager would like to reassure Parties that all Impact Assessment responses have been considered and appropriate action/activity completed. This included the opportunity to engage on this Change Proposal on the 26 May during the REC V3.0 Performance Assurance Webinar and the additional justification provided in the Preliminary Change Report.
	Western Power Distribution DNO	Yes we agree with the proposed solution	
Do you agree with the proposed implementation date and implementation techniques? If not, please explain why.	**Ovo** Energy Supplier	We would not be able to update reports by 01 August 2022. This is too short. A minimum 12 month lead time is required. Reasons already stated in response to question 1.	If any Energy Supplier is concerned about their ability to deliver the required changes in line with the implementation date (noting the transition arrangements incorporated as part of the response to the consultation) the Party may wish to submit a suitably justified derogation application.
	Scottish Power Energy Supplier	We agree with the proposed implementation date for CSS and CDSP reporting.	
	Drax Group Energy Supplier	It's sensible for the changes to centrally sourced data, required to reflect Faster Switching and the implementation of REC v.3, to be implemented as close to Faster Switching go-live as is practicable. However, we strongly disagree with the proposed implementation date for the changes to existing supplier reports - According to the Preliminary Change Report, the appeal window for R0038 is expected to close on 12th July making an implementation date of 18th July (or even 1st August) unrealistic for suppliers. We cannot instigate these changes until the exact requirements are confirmed. Making changes to existing reports, or building new ones, requires IT development and testing which, with the current level of mandatory industry change, we do not have the	We note a number of comments have been received regarding the implementation date. As noted in the Preliminary Change Report, we have reviewed the options for a transitionary period and as outlined in the Final Change Report, a 6-month transition period has been introduced. Either the existing or revised formats of the 1430 and 1440 reports can be provided – allowing parties to submit per the existing specification up to and including the January 2023 submission window (for data up to and including 30 November 2022)or to take advantage of the changes more quickly where desired.

		capacity to factor in at short notice. A transitionary period, as suggested in the Preliminary Change Report may be appropriate provided that parties are afforded at least 6 months to implement the changes, as would have been afforded for system changes under the MRA	
	Utilita Energy Supplier	Yes (provided supplier reporting amendments are excluded).	We do not believe it appropriate to remove the changes requiring direct action by Suppliers however we have applied a transition period in response to the feedback received in relation to existing reporting. As outlined in the Final Change Report, a 6-month transition period has been introduced. Either the existing or revised formats of the 1430 and 1440 reports can be provided – allowing parties to submit per the existing specification up to and including the January 2023 submission window (for data to November 2022) or to take advantage of the changes more quickly where desired.
	Western Power Distribution DNO	As a Distribution Network Operator there have been no changes to the PARC which will result in changes to the reporting produced by our organisation therefore we believe other more impacted parties are better positioned to respond to this question	
Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the Performance Assurance Board?	**Ovo** Energy Supplier	Given this would impact the resource currently required for MHHS and Faster Switching, this should not be subject to self-governance.	The Change Path for this Change Proposal has been determined in line with the Change Management Schedule. The Code Manager has determined that this Change Proposal does not meet the conditions set out in the Change Management Schedule to support an Authority decision. *9.3. Authority-Approved Changes are for those Change Proposals which satisfy one or more of the following criteria: (a) the changes are likely to have a material impact on existing or future Energy Consumers; (b) the changes are likely to have a material impact on competition in the supply of gas or electricity in Great Britain; (c) the changes are likely to discriminate in their*

			effects between one Party (or class of Parties) and another Party (or class of Parties); or (d) the Change Proposal has been raised by the Authority or as a result of a direction by the Authority.
	Scottish Power Energy Supplier	Yes	
	Drax Group Energy Supplier	Yes	
	Utilita Energy Supplier	Yes	
	Western Power Distribution DNO	Yes we agree with the Code Manager's assessment of the Change Path. .	
Do the changes to the Service Provider reporting, defined in the relevant Service Definitions, introduce any new obligations on your Organisation?	**Ovo** Energy Supplier	Yes	
	Scottish Power Energy Supplier	See our response to the IA.	
	Drax Group Energy Supplier	We don't expect the changes to the Service Provider reporting to introduce any new obligations on our organisation.	
	Utilita Energy Supplier	No, not that we are aware of.	
	Western Power Distribution	As a Distribution Network Operator there have been no changes to the PARC which will result in changes to the	

	DNO	reporting produced by our organisation and therefore will not introduce any new obligations on us.	
Do you have any other comments relating to this Change Proposal?	**Ovo** Energy Supplier	Due to the cost and complexity of the mod with little justification, we do not support the implementation of this change proposal. If this mod is approved, the exit fee data requested would need to be reported several months after the change of supplier event, as we would likely use the monetary transaction as the identifier.	Please see previous response to question 1 regarding justification for the change and question 2 regarding a transition period implemented in response to consultation feedback. In respect of the timing of exit fee vs supply end date we note that items provided per the PARC are provided with a lag – with reporting on a given performance period (month) provided the first working day two months after the performance period.
	Scottish Power Energy Supplier	No	
	Drax Group Energy Supplier	No	
	Utilita Energy Supplier	No further comments.	
	Western Power Distribution DNO	We note that in the responses to the Impact Assessment, there were several typographical and referencing errors identified. It would be helpful for future changes that where errors have been identified an updated red-lined version of the documents be issued to enable parties to see that those errors have been corrected.	An updated tracked changes version of the PARC was shared with the Preliminary Change Report. This had been updated to reflect all additional changes/updates that had been made post Impact Assessment. We acknowledge this could have been highlighted within the Preliminary Change Report.