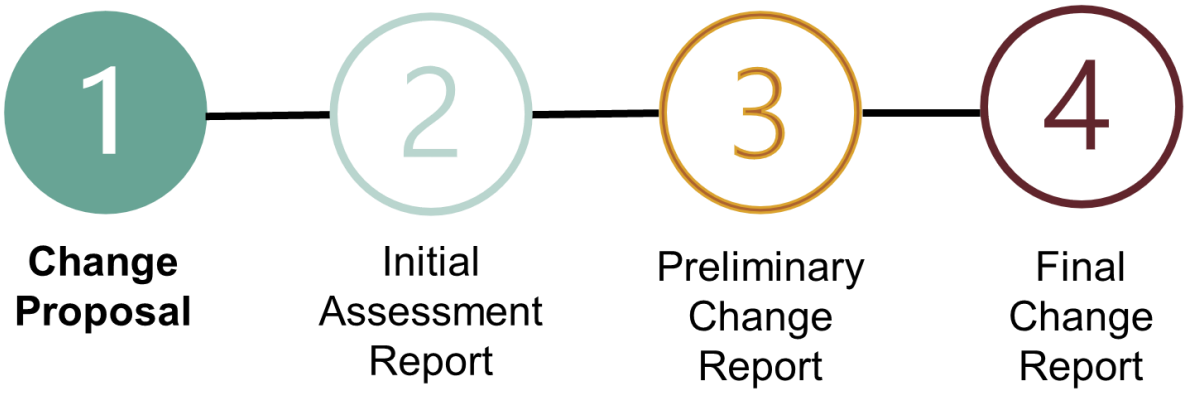
This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

CHANGE PROPOSAL FORM (COPY)

PLEASE NOTE: THIS IS A COPY FOR INFORMATION ONLY. TO SUBMIT A CHANGE PROPOSAL PLEASE USE THE ONLINE FORM ON THE REC PORTAL.



PURPOSE:	This is a copy of the Change Proposal Form submitted by the Proposer on the REC Portal.
NOTES:	The information in this form is subjective to the views of the Proposer at the time of submitting the form, and prior to formal assessment by the Code Manager. The solution will not be finalised until the publication of the Preliminary Change Report.
NEXT STEPS:	The Code Manager will complete an initial assessment of the Change Proposal and determine if additional development or assessments is required. The Initial Assessment Report will be published with the Change Proposal Plan and reviewed by the Change Panel.

RETAIL ENERGY CODE

1 PERSONAL DETAILS

PROPOSER NAME *(Mandatory)*	Bryan Heap
COMPANY *(Optional)*	
COMPANY TYPE *(Optional)*	Distribution Network Operator
TELEPHONE NUMBER *(Optional)*	
EMAIL ADDRESS *(Mandatory)*	

2 CHANGE PROPOSAL SUMMARY

CHANGE PROPOSAL TITLE *(Mandatory)*	Clarification of REC Maintenance of Qualification Schedule
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	Schedule 9 (Maintenance of Qualification for the REC) contains an obligation to document any system changes or processes which may impact interfaces with the CSS Provider or other Market Participants. This is inconsistent with the guidance document which advises that material event includes major systems and process change (rather than “any” changes).
WHAT IMPACT IS THIS HAVING? *(Mandatory)*	There is an inconsistency between the two documents which may result in issues of interpretation when parties are completing the annual audit process. The requirement to document any change is disproportionate to the objectives of the schedule and the audit regime and could significantly increases the costs of the audit and also result in a significant number of system changes being identified which have no material impact on retail risk.
WHAT OUTCOMES DO YOU CONSIDER ARE NEEDED TO ACHIEVE AN EFFECTIVE SOLUTION? *(Mandatory)*	Alignment of the Schedule and Guidance document to require major system or process changes to be declared. We would recommend that the definition of a “major” change proposed in the earlier drafting of the Interpretations Schedule (V0.3 June 2019) should be revisited.

IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE CHANGE PROPOSAL THAT WOULD BE USEFUL? *(Optional)*	At the December REC PAB meeting, the DNO representative asked the Code Manager to clarify if only material changes should be raised as part of Maintenance of Qualification, as there is a difference between the wording in the Code and the associated guidance. The Code Manager clarified that the guidance is in place to give further detail, and states that only significant and material changes should be reported to the Code Manager. This is inconsistent with the wording in the actual requirements and the template for the annual statement. Other industry codes only require material changes to be disclosed for example the BSC Annual statement and SEC annual security assessment only require "material" system changes to be declared.

3 CONSUMER IMPACTS

WHICH CONSUMER TYPES WILL BE IMPACTED BY THIS CHANGE PROPOSAL? *(Mandatory)*	☒ 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 CHANGE PROPOSAL HAVE FOR THESE CONSUMERS? *(Mandatory)*	☐ Switching experience ☐ Billing accuracy ☐ Trust and confidence ☐ Safety ☐ Security of supply ☐ Ability to pay ☐ On site experience ☒ Other (please provide details in the Additional information box below)
ADDITIONAL INFORMATION *(Optional)*	Efficient discharge of regulatory requirements

RETAIL ENERGY CODE

4 CODE IMPACTS

Does this Issue relate to or impact:

THE REC OR REC SCHEDULES? *(Optional)*	☐ Main Body ☐ Interpretations and Definitions Schedule ☐ Transition Schedule ☐ Accession Agreement ☐ Company Governance Schedule ☐ Change Management Schedule ☐ Performance Assurance Schedule ☒ Qualification and Maintenance Schedule ☐ Market Exit Schedule ☐ Charging Methodology Schedule ☐ Prepayment Arrangements Schedule ☐ Central Switching Service Schedule ☐ Data Access Schedule ☐ Energy Theft Reduction Schedule ☐ Transfer of Consumer Data Schedule ☐ Metering Operations Schedule ☐ Metering Accreditation Schedule ☐ Smart Meter Installation Schedule ☐ Secure Data Exchange Schedule ☐ Green Deal Arrangements Schedule ☐ Registration Services Schedule ☐ Related Metering Points Schedule ☐ Address Management Schedule ☐ Switching Data Management Schedule ☐ RMP Lifecycle Schedule ☐ Switching Service Management Schedule ☐ Resolution of Consumer Facing Switching and Billing Issues Schedule ☐ SPAA Transition Schedule ☐ MRA Transition Schedule ☐ Unbilled Energy Code of Practice ☐ Gas Metering Code of Practice ☐ MOCoPA ☐ ASPCoP ☐ Change Panel Terms of Reference ☐ Performance Assurance Board Terms of Reference

ADDITIONAL INFORMATION *(Optional)*	

THE DATA SPECIFICATION? *(Optional)*	☐ Data Item Catalogue ☐ Market Message Catalogue ☐ Data Access Matrix ☐ Standards Definition
ADDITIONAL INFORMATION *(Optional)*	

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

REC PARTIES AND/OR MARKET PARTICIPANTS? *(Optional)*	☒ Energy Suppliers ☒ Distribution Network Operators ☒ Gas Transporters ☐ Metering Equipment Managers ☐ DCC ☐ Shippers ☐ Data Collectors ☐ Data Aggregators ☐ Green Deal Providers ☐ Green Deal Finance Parties

	☐ Meter Asset Providers ☐ AMR Service Providers ☐ EES Users ☐ GES Users ☐ GDCC Users ☐ Other (please provide details in the Additional Information box)
ADDITIONAL INFORMATION *(Optional)*	Impact on DNOs and Suppliers as the requirements to provide updates will be aligned with the guidance document.

OTHER INDUSTRY CODES? *(Optional)*	☐ BSC ☐ DCUSA ☐ SEC ☐ UNC ☐ IGT UNC
ADDITIONAL INFORMATION *(Optional)*	

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

5 CHANGE PROGRESSION

DO YOU BELIEVE THIS CHANGE PROPOSAL MEETS THE CRITERIA FOR 'URGENCY' AND SHOULD BE PROGRESSED	No

UNDER AN URGENT TIMETABLE? **IF SO, PLEASE PROVIDE JUSTIFICATION?** *(Optional)*	
ARE THERE ANY REQUIRED TIMESCALES FOR THE DEVELOPMENT OR IMPLEMENTATION OF THIS CHANGE PROPOSAL? *(Optional)*	The change proposal should be implemented at a time to give sufficient notice to parties ahead of the annual audit.
ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THE CHANGE PROPOSAL WHICH MAY IMPACT ITS PRIORITY OR PROGRESSION TIMETABLE? *(Optional)*	No
DOES THIS CHANGE PROPOSAL RELATE TO AN EXISTING OR PREVIOUS CHANGE PROPOSAL? *(Optional)*	No

6 ATTACHMENTS

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