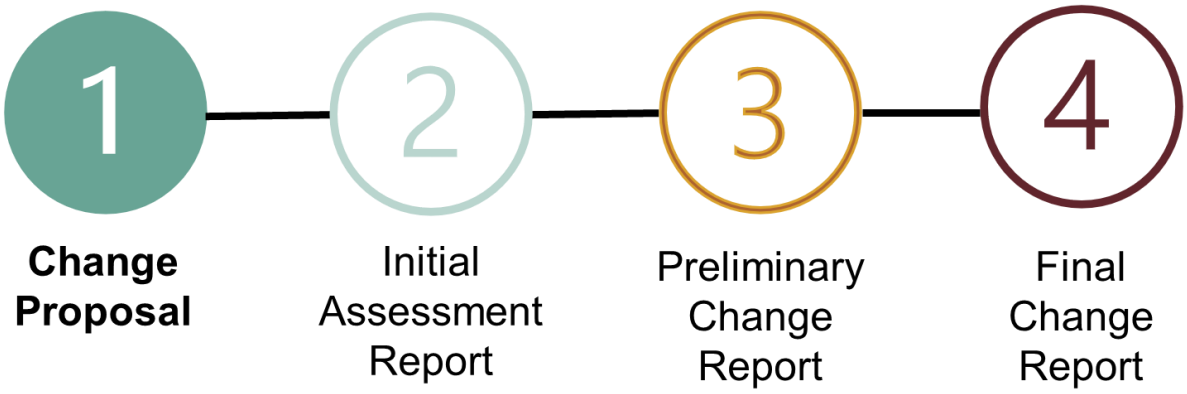
RETAIL ENERGY CODE

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)*	Cordelia Grey
COMPANY *(Optional)*	DCC
COMPANY TYPE *(Optional)*	DCC
TELEPHONE NUMBER *(Optional)*	
EMAIL ADDRESS *(Mandatory)*	

2 CHANGE PROPOSAL SUMMARY

CHANGE PROPOSAL TITLE *(Mandatory)*	REC Services Procurement Clarification
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	A new Clause 5.3 was added into the REC Main Body during the REC v3 development which currently reads: "*RECCo is responsible for procuring the REC Services (including the Centralised Registration Services) from the REC Service Providers (including the CRS Provider). RECCo is then responsible for supplying the REC Services (including the Centralised Registration Services) to the REC Service Users in accordance with this Code. Any and all provision of services by the REC Service Providers to the REC Service Users under this Code is undertaken solely as procured by RECCo under this Code. It is acknowledged that the REC Services are supplied to RECCo and used for the purposes of its business as the central administrator of this Code and the REC Services. Acting via the REC PAB, RECCo will take action against the REC Service Providers where they fail to provide the REC Services in accordance with this Code*." The text that reads "*Any and all provision of services by the REC Service Providers to the REC Service Users under this Code is undertaken solely as procured by RECCo under this Code*" requires amending for the following reasons:

	- It refers to “all services” by REC Service Providers which is too wide and ambiguous this should only refer to the defined term “REC Services” consistent with the rest of this clause and is necessary to avoid ambiguity. - The meaning of “REC Service Providers” includes DCC but RECCo is not entitled to be a “REC Service User” (clause 5.2). The result is that the 5.3 wording which starts “Any and all provision of [REC Services] by REC Service Providers to REC Service Users” does not correctly reflect the understanding that: (i) DCC, in its role as a REC Service Provider, will be providing the CRS to RECCo (not to REC Service Users), which DCC has itself already procured from switching providers under the DCC Licence and for which DCC will invoice RECCo under clause 9.25 from 1 April 2023 onwards; (ii) the CRS is not “solely” procured by RECCo under the Code – the CRS is first procured by DCC and stated to be procured or provided in its role as CRS Provider under the Code (see, for example, clause 13.10); (iii) REC Service Providers will be performing the REC Services but the intention is that they will not be “providing” the REC Services to REC Service Users in a VAT sense, so this wording conflicts with the rest of the clause.
WHAT IMPACT IS THIS HAVING? *(Mandatory)*	The current drafting could impact both DCC and RECCo’s ability to protect input VAT entitlement as a recipient of the CRS.
WHAT OUTCOMES DO YOU CONSIDER ARE NEEDED TO ACHIEVE AN EFFECTIVE SOLUTION? *(Mandatory)*	Amending Clause 5.3 to clarify that all provision of REC Services to the REC Service Users (including the Centralised Registration Service is procured by, and from, the CRS Provider) and are procured from the REC Service Providers by RECCo. These clarifications will help protect both DCC and RECCo’s input VAT entitlement.

IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE CHANGE PROPOSAL THAT WOULD BE USEFUL? *(Optional)*	

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)*	No consumer impact

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)*	RECCo

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 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)*	
ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THE CHANGE PROPOSAL WHICH MAY IMPACT ITS PRIORITY OR PROGRESSION TIMETABLE? *(Optional)*	
DOES THIS CHANGE PROPOSAL RELATE TO AN EXISTING OR PREVIOUS CHANGE PROPOSAL? *(Optional)*	

6 ATTACHMENTS

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