RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0059 – MAINTENANCE OF QUALIFICATION SCHEDULE CHANGE

On 10 March 2023 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution and draft legal text for Change Proposal R0059.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

DOCUMENT VERSION	1.0
RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	14/04/2023
RESPONSIBLE COMMITTEE	REC PAB
LEAD ANALYST	Jonathan Holland

DATE IMPACT ASSESSMENT ISSUED	10/03/2023
RESPONSE DEADLINE	24/03/2023

Question 1:	Do you agree the proposed solution addresses the problem statement? If not, why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Xoserve (REC Service Provider)	n/a	n/a
Scottish Power Energy Networks DNO	We are supportive of the proposed solution	n/a
National Grid Electricity Distribution DNO	Yes we agree with the proposed solution of this change proposal.	n/a
Electricity North West Limited DNO	We agree that the proposed solution meets the proposals set out in R0059.	n/a

Question 2:	Where obligations are being extended to all REC Service Users what impact would this have on your organisation? If so, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Xoserve (REC Service Provider)	We do not believe that this will have any impact on our organisation	n/a
Scottish Power Energy Networks DNO	We have not identified any impacts on our organisation	n/a

National Grid Electricity Distribution DNO	As a DNO's we don't believe this will have a direct impact on our organisation.	n/a
Electricity North West Limited DNO	As a DNO, we were already captured under all of the requirements so there are no additional impacts.	n/a

Question 3:	Where obligations are being extended to all REC Service Users would this incur any costs to your organisation? If so, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Xoserve (REC Service Provider)	At this time we don't believe that we will be impacted by any extra costs.	n/a
Scottish Power Energy Networks DNO	We have identified no costs with the implementation of this change	n/a
National Grid Electricity Distribution DNO	As a DNO we don't believe we will incur any costs.	n/a
Electricity North West Limited DNO	There are no additional obligations being placed on DNOs and therefore, no additional costs are expected.	n/a

Question 4:	What lead time is required for your business to implement this Change Proposal solution if it is approved?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**

Xoserve	n/a	n/a
Scottish Power Energy Networks DNO	We have identified no areas of impact for implementation as it provides further clarity	n/a
National Grid Electricity Distribution DNO	n/a	n/a
Electricity North West Limited DNO	We do not anticipate any lead times to be required for DNOs.	n/a

Question 5:	What support would your organisation need following the implementation of the proposed changes? If so, please provide details. (e.g., training or guidance)	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Xoserve (REC Service Provider)	n/a	n/a
Scottish Power Energy Networks DNO	We have identified no areas of impact for implementation of this	n/a
National Grid Electricity Distribution DNO	n/a	n/a
Electricity North West Limited DNO	None	n/a

Question 6:	Do you have any other comments on the proposed changes?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Xoserve (REC Service Provider)	n/a	n/a
Scottish Power Energy Networks DNO	No other comments	n/a
National Grid Electricity Distribution DNO	We believe in Entry Assessment Requirements 2.5 (e) it should read becoming a REC Service User for the Energy Theft Tip-Off Service in accordance with the Energy Theft Reduction Schedule. In 2.7 (d) it should read becoming a REC Service User for the Energy Theft Tip-Off Service in accordance with the Energy Theft Reduction Schedule; and Also, we would like clarification on what is considered significant changes in section 11.5 Maintenance of Qualification Also in Section 9.1 Limitation of Liability we believe where it states: *'The provisions of Clause 14 (Limitation of Liability) of the main body of the Retail Energy Code shall apply on an Equivalent Basis, so that each party's liability in respect of this Access Agreement'* party's should read **Party's**	Updated Updated This is documented in section 8 of the REC Maintenance of Qualification Guidance document (an update will also be made to that document to accompany this Change Proposal) The references to "party" without the hyperlink are correct. In these instances, we are referring to the parties to the Access Agreement, rather than all the "Parties" to the REC.

	And also in 10.2 '*Either party may sub-contract'* should read **Party**	The references to "party" without the hyperlink are correct. In these instances, we are referring to the parties to the Access Agreement, rather than all the "Parties" to the REC.
Electricity North West Limited DNO	Following discussions between REC and ENWL, R0059 was supposed to capture the issue identified under R0050 where there is an identified inconsistency between Schedule 9 and the guidance document. R0050 was closed on the basis that this would be addressed in R0059. The current drafting does not make the required amendments to address this inconsistency. Section 11.4(b) should be modified to ensure that only material changes are required to be disclosed in the Annual Statement.	Added the word *significant* to the wording of 11.4b to match the wording used in 11.5. Further guidance is also in the REC Maintenance of Qualification Guidance document (an update will also be made to that document to accompany this Change Proposal)