RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0073 -INTRODUCTION OF A HOUSEKEEPING CHANGE PROPOSAL PROCESS

On 27 January 2023 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0073.

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

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RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	24 FEBRUARY 2023
RESPONSIBLE COMMITTEE	CHANGE PANEL
LEAD ANALYST	COLETTE BALDWIN

DATE CONSULTATION ISSUED	27/01/2023
RESPONSE DEADLINE	10/02/2023

Question 1:	Do you agree with the proposed solution? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
David Addison Xoserve Company Type: Other	The proposal seems unclear. It appears that it is incumbent on a party to raise the Housekeeping Change Proposal but would anticipate that this would be a REC Code Manager Role after any issues have been highlighted to them by the party. We agree with the principle that there should be a process to manage administrative changes to the Code. It is unclear how the process itself interacts with the main REC Change process. We assume that this is entirely outside of the REC Change process and is effectively creating a secondary process which will require parties to review changes to the REC that is separate to the REC Change Process. As such, question whether this is enhancing the efficiency of the process for participants. We would recommend that the cut down version of the process is incorporated into the REC Change process – but that these changes are clearly marked as housekeeping changes. We also question the assertion in the Change Report that each release will require a housekeeping change. Any	The process has been designed such that any interested party could raise a change, if they wish to, but doesn't require them to. It is likely that the Code Manager will raise them on behalf of any party should they identify and report an issue to the Code Manager, via the Service Desk. It is more likely that they will be identified and raised by the Code Manager. The new Housekeeping Change Proposal Process uses elements of the existing process but removes others that are considered unnecessary for this type of change. Given that these changes will amend the legal text of the REC, it's important that there is suitable external visibility of the proposed changes, however, due to the materiality of the text changes, we believe it is appropriate to reduce the burden on parties in terms of review and responses. We have not asserted that every release will require a Housekeeping Change, however, each release so far has included housekeeping changes, and as we are working through inherited documents and aligning the gas and electricity requirements, it is likely that until all of the schedules have been extensively reviewed, we may

	changes to the REC should be picked up through the legal drafting for each change. The marked up Legal Text changes do not appear to align to the content in R0073.	identify things that would benefit from being updated rather than waiting until a future change affecting those schedules is identified. We have asked the responder to provide further details on this point, and will review any response provided.
Kelly Kinsman National Grid Electricity Distribution Company Type**: DNO**	Yes, we agree with the proposed solution.	Noted
Emily Waters BU UK Company Type: **IDNO**	We agree with the proposed solution – having worked with many other Codes which have an active housekeeping amendment system we can clearly see the benefit of having such a process and believe it will be a significant improvement both for REC staff and REC parties.	Noted
Alex Cebo EDF Energy Company Type: **Supplier**	Whist we agree in principle with the change proposal to introduce a Housekeeping Change process into REC, we note that in order for this process be successful a number of checkpoints/ controls is required within the process to ensure no material changes to industry parties are unintentionally progressed through this process. Our view is that any such changes are presented at the REC Change Panel for the Panel to assess their materiality, followed by impact assessment requested to industry parties. Inclusion of these additional controls will allow for the right level of change classification and prevention of any	The Code Manager believes that there are sufficient controls in the process as designed. The Code Manager will assess the change for material impacts, which will include relevant internal reviews of the impacts and the legal text and will prepare a Housekeeping Change Report. This report will be published on the REC Portal in advance of the Change Panel meeting where a decision is to be made. Interested Parties are welcome to raise any concerns regarding the Change Proposal direct to the Code Manager or to a Panel Member. Members of the Change Panel and REC Parties will have an opportunity to review the Housekeeping Change Report prior to a decision being requested of the Change Panel.

	undesired material consequences to the REC and Non-REC parties.	Should a successful challenge to the decision to categorise the change as Housekeeping be received, the Code Manager will not progress the change as a Housekeeping Change Proposal, but will direct the change through the Standard Change Proposal Process. There will be a further opportunity at the Change Panel where the Housekeeping Change Report is to be presented, as the Code Manager will ask Panel Members to confirm that the Change indeed meets the criteria to be considered Housekeeping, before being asked to make a decision on the change itself.
Cordelia Grey DCC Company Type: **DCC**	DCC agrees with the proposed solution and believe it is necessary to facilitate a quicker process to correct housekeeping changes within the REC. We do not believe housekeeping changes should be subject to the full REC Change Process but acknowledge within the proposed solution that there is the opportunity for REC Parties/REC Service Providers/Others to highlight when they do not believe the change is purely housekeeping and the process that follows after. Can we please confirm reviewers have 5 working days to ensure the Housekeeping Change Proposal and draft legal text does not have a material impact?	The Change Report will be published on the REC Portal five days ahead of the Change Panel Meeting at which it is to be considered. If there are concerns raised to either Panel Members or the REC Code Manager, then the change will not progress to a decision until either the issue is resolved and it can continue, or the change will be subject to the Standard Change Process.

Question 2:	**Do you agree with the proposed implementation date and implementation technique? If not, please explain why.**

RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
David Addison Xoserve Company Type: **Other**	We make no observations on the implementation date at this time. We agree that this change does not need to be considered in a major release but would suggest that further consideration be provided regarding this process.	Noted, please see our response to question 1.
Kelly Kinsman National Grid Electricity Distribution Company Type**: DNO**	Yes, we agree with the proposed implementation date and technique.	Noted
Emily Waters BU UK Company Type: **IDNO**	We agree with the proposed implementation date and have no concerns re: the proposed implementation approach.	Noted
Alex Cebo EDF Energy Company Type: **Supplier**	Please refer to our comments above. Additional checks are required to ensure any material changes are not progressed without industry impact assessment.	Noted, however, we are confident that the process has been designed with appropriate checks to ensure that only appropriate Housekeeping Changes are progressed through this route.
Cordelia Grey DCC Company Type: **DCC**	Yes, we agree.	Noted

Question 3:	**Do you have any other comments/questions relating to this change proposal?**

RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
David Addison Xoserve Company Type: **Other**	As highlighted above we do not believe that the legal text provided aligns to R0073.	Noted. Please see our comments on Question 1
Kelly Kinsman National Grid Electricity Distribution Company Type**: DNO**	We question if Section 2.1 (a) should read paragraph not paragraphs also if 3.2 should read The Code Manager shall (in accordance **with** this Paragraph 3)	Having discussed their response with National Grid, it transpires that the comments relate to an earlier version of the Legal Text that was provided with the Initial Assessment Report. The version commented on by National Grid has been superseded by Legal Text published with the Preliminary Change Report, and these comments are no longer relevant.
Emily Waters BU UK Company Type: **IDNO**	We agree with the proposed implementation date and have no concerns re: the proposed implementation approach.	Noted
Alex Cebo EDF Energy Company Type: **Supplier**	Please refer to our comments above.	Noted – see our response to earlier comment.
Cordelia Grey DCC Company Type: **DCC**	Note that this Change Proposal, in addition to introducing the changes required to have a Housekeeping Change Process, also includes actual housekeeping changes. Should these housekeeping changes, that are not related to the introduction of the new process, be captured separately, and potentially, follow the new process once implemented?	The housekeeping changes proposed to Schedule 5 have been subject to significant internal challenges and an external legal review and we feel it is appropriate, and more efficient, to include those revisions at the same time as making the changes to the Schedule to introduce the new process.