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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0092 – DCC SERVICE LEVEL AGREEMENTS FOR THE SWITCHING INCENTIVE REGIME

R0092A – DCC SERVICE LEVEL AGREEMENTS FOR THE SWITCHING INCENTIVE REGIME (ALTERNATIVE)

On 01 March 2024, the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0092 and R0092A.

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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Question 1:	Do you agree with the Code Manager's assessment of the benefits and drawbacks of the R0092 solution. Do you have any further comments on the solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	We agree that R0092 does not maintain appropriate protection for CSS Users and consumers. This CP should be withdrawn.	Noted, thank you.
Scottish Power Energy Networks (DNO)	Yes, we are in agreement with the Code Managers assessment of the benefits.	Noted, thank you.
Xoserve (GRDA)	We agree with the assessment of the benefits and drawbacks of the R0092 solution. The drawbacks summarise some of the concerns that we have previously raised.	Noted, thank you.
Data Communications Company (CRS Provider)	No, we disagree with the Code Manager's assessment of the benefits and drawbacks of R0092. There are benefits in the R0092 solution that have not been included in the Code Manager's assessment. We have listed below how the service levels have been derived and detail the benefits of each. <u>Maximum Demand Volumes</u> It was agreed in the working group the maximum demand volume required an update. 1,088,000 was agreed upon as this volume was based on DCC's methodology which was explained and accepted at the R0092 working group in September 2023. The messages included in the scope of the maximum demand volume were also clarified as a result of DCC raising R0092. The removal of ambiguity and ensuring	The Preliminary Change report includes a benefit of R0092 providing clarity on Maximum Demand Volumes. As set out in the Preliminary Change Report, both the work group and impact assessment responses highlighted concerns regarding the DCC's proposals to increase the measurement period for asynchronous responses from hourly to daily as there were concerns regarding the impact this would have to Switching if the CRS Provider was not incentivised to prevent significant delays to messages on an hourly basis. Where the

	the service levels are up to date is integral to a functional code and incentive regime. DCC agreed to add a requested 5% optimism bias resulting in 1,142,400 maximum demand volume. DCC suggested this volume be reviewed on at least an annual basis which will ensure the service levels evolve in tandem with changes in the market. <u>Synchronous Response</u> The original DCC proposal suggested retaining the daily volume target of 2 seconds or less but removing the 90th percentile of 4 seconds or less on the basis that it would not result in a change of service to the end user, would simplify the measure and aligns to the service levels DCC has procured on behalf of REC Parties. We listened to industry feedback who requested additional certainty that synchronous validation would still occur within the required service levels. Whilst the inclusion of the 90th percentile does not guarantee this, we reinstated it within our proposal to provide added confidence to industry. DCC has maintained the daily measurement of volume for synchronous responses and have clarified that all message types are included to removal any ambiguity. <u>Asynchronous Response</u> The DCC proposal suggested a peak daily volume with a mean time of three seconds or less and a peak daily volume with a 90th percentile time of six seconds or less. The change from hourly to daily measurements ensures a fairer and achievable incentive regime and simplifies the measure in the same manner as the changes to synchronous responses. There will be no change in the service received by industry due to the change in reporting. During the working groups, representatives were asked to share what negative impacts would be experienced by them should the asynchronous measure change from hourly to daily. No negative impacts were provided. Asynchronous messages vary throughout the day. There is currently the potential for a single message to take longer than usual to be	DCC proposed to move this to a daily measure, the work group supported a maximum back-stop response time being introduced, to provide this assurance. The DCC chose not to adopt this measure, in which case user feedback was unanimous that the measure should remain hourly. The work group did not state that only measures fully within the DCC's control should be defined in the service level. The work group recommended that the DCC remains responsible for the end-to-end processing for Gate Closure but recognised that there will be instances where the service levels failing are not within the DCC's control. Where this is the case, the work group supported the use of the existing exemptions process with the PAB to ensure that the DCC is not unduly held to account for issues not within its control. There is no ambiguity on the current service levels for Switching Incidents. The REC is clear that the service level must be met for all Switching Incidents.

	processed which, unfairly, causes the whole month to fail the service level due to the 100% of hours target. However, in a single day, a single 'long' message is unlikely to cause the whole day to fail as the number of messages in any day is high. DCC has removed ambiguity in the service level by clarifying that any other market message that may require an asynchronous response would also be in scope of the service level. The change is also consistent to the changes proposed to synchronous responses, so the reporting will be the same. We consider these changes to be valid and necessary to ensure an effective and achievable incentive regime is in place. <u>Gate Closure</u> The DCC proposal stated only the aspects of Gate Closure that are fully within DCC's control should be included in the service level and the incentive regime. This position was accepted by the working group and recorded in the published minutes. DCC has no contractual levers with the end users, either directly or via the REC. Therefore, the Gate Closure service level can only include the securing of switches up until the point where all messages are queued for delivery to each relevant Market Participant. We note the working group and impact assessment responses, and we agree that there are benefits to industry in the CSS Provider being accountable for the end-to-end performance. However, until the obligations are drafted in the REC for DCC as the CSS Provider to be accountable for the full end-to-end performance of the process then the process after the queuing of messages must be descoped from the service level. Ofgem's position on incentives confirms that where a metric is outside of DCC's full control then it cannot be used. This precedent was set out in its price control decision for RY22/23, whereby Ofgem has zero-weighted Service Reference Variant (SRV)8.11 (which is a metric included in the operational performance regime for smart metering) because it is not under DCC's full control.	

	DCC recognises that there is a consequential impact to the Switching Data Service Providers (SDSPs) should DCC not meet the Gate Closure service level. However, DCC will continue to work hard to achieve the overall Gate Closure service level, but it would be inappropriate for financial incentives to be place against it. Instead, we propose that Gate Closure is measured as a performance indicator, which can support the REC Performance Assurance Board (REC PAB) in reviewing end-to-end Gate Closure performance. <u>Switching Incidents</u> DCC's proposal does not change the target response/resolution times for priority 1 and 2 incidents and has specified that these should be achieved 100% of the time. The proposal also retains the target response and resolution times for priority 3 and 4 incidents (i.e. for priority 3 incidents, it is 3 working hours for a response and 3 working days for a resolution and for priority 4 incidents it is 1 working day for a response and 10 working days for a resolution) but specifies target success rates of 100% for responses and 90% for priority 3 resolution and 95% for priority 4 resolution. These changes represent proportionate, challenging but achievable targets which will allow DCC to investigate and resolve complex issues without compromising on quality of service. Clarifying that the service levels are set at 90% and 95% also removes any ambiguity over whether the target service levels for those measures, which is integral to a functioning incentive regime. <u>Service Requests</u> We have proposed no change to the fulfilment targets for switching service requests, however we have clarified success rates for each. i.e. critical and high priority requests should meet the target fulfilment times of 1 and 2 Working Days respectively 100% of the time. We have proposed that medium and low priority requests should achieve the 3 and 10 Working Day targets 98% of the time. These changes represent	

	proportionate, challenging but achievable targets which also align to the service levels DCC has procured on behalf of REC parties. It is important to note that R0092 is unlikely to result in DCC achieving all service levels and would likely still result in margin loss. However, R0092 proposes a set of service levels which are very challenging but achievable, we suggest that these service levels are taken forward but that they are kept under review as the service matures. This will allow us to recalibrate the service levels based on actual service performance so that the regime continues to be stretching but achievable and therefore acting as an effective incentive.	

Question 2:	Do you agree with the Code Manager's assessment of the benefits and drawbacks of the R0092A solution. Do you have any further comments on the solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	Whilst we believe that any reduction in SLAs is not in the best interest of Industry or Consumers, we find R0092A to be the preferable option.	Noted, thank you.
Scottish Power Energy Networks (DNO)	We agree with the assessment of the benefits and drawbacks of both the R0092 and R0092A solutions.	Noted, thank you.
Xoserve (GRDA)	We also agree with the assessment of benefits and drawbacks of the R0092A solution. These protect both the Switching journey and timely issue resolution for CSS users.	Noted, thank you.
Data Communications Company (CRS Provider)	No, we disagree with the Code Manager's assessment of the R0092A. This is explained below: The assessment states that R0092A "does not propose any additional or increased requirement for the CRS Provider to deliver." This	The existing requirement in the REC is for 100% of Switching Incidents to be resolved within the current timescales. R0092A proposes that a lower proportion of Switching Incidents must be met in the same

	statement is incorrect. The introduction of maximum incident response/resolution times for priority 3 and 4 incidents is a new requirement that was introduced in February 2024, and DCC has not had the opportunity to assess the impact of this change, nor has R0092A been discussed in any of the working groups. Introducing a maximum response time in R0092A does not necessarily guarantee that a resolution can and will be found for every P3 or P4 incident. As the nature of each incident cannot be predicted, an absolute backstop for resolution of every P3 or P4 incident is not achievable. <u>Performance Measurement Exclusions List</u> A key drawback of both solutions is the lack of a Performance Measurement Exclusions List (PMEL). DCC raised the PMEL ahead of the working groups commencing so it could be considered by industry. The PMEL was however not taken forward resulting in the need for DCC to appeal each failure it believes should be excluded from that reporting period. This process is considerably time consuming for both DCC and REC PAB. The drawbacks of R0092A touches on the requirement for DCC to utilise the existing exemptions process where the Gate Closure target is missed as a result of other Parties on a regular basis. This is not the only scenario where DCC will have to utilise this process. <u>Maximum Demand Volumes</u> R0092A proposes a 'rounded up' volume that is not based on any shared analysis/methodology. DCC agreed to a 5% optimism bias on top of the 1,088,000 that we suggested, for which we shared the methodology in	timetables, and provides the CRS Provider additional time (which it does not have today) to resolve the remaining incidents. The Impact Assessment for R0092 included reference to maximum timescales being included in the proposal, and asked a specific question *"If a maximum timescale were incorporated, what do you feel this should be? Consider the maximum response/resolution time prior to this causing a risk to your organisation."* The DCC agreed to withdraw the PMEL proposal following feedback from the work group. The Code Manager accepts that there will be other occasions where the DCC may wish to submit an exemption request to the PAB by reason of Force Majeure. The Code Manager would note that the vast majority of examples set out in the DCC's original PMEL proposal did not constitute Force Majeure, which was a significant contributor to why this proposal was not acceptable. The Code Manager notes the comment on the rounded up Maximum Demand Volume proposal under R0092A and has altered this to be an exact 5% optimism bias.

Question 3:	Do you have any further comments on the proposed solutions for R0092 or R0092A?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	R0092A ensures that processing must occur within the day and therefore there will be system alignment across industry. We also take assurance that the CRS Provider is responsible for the end-to-end gate closure process.	Noted, thank you.
Scottish Power Energy Networks (DNO)	No other comments.	-
Xoserve (GRDA)	Text from the proposal in blue *The R0092A proposal is for five percent to be applied for the maximum demand volume for all Switching related messages but for it to be rounded up to 1,150,000.* We have no issue with the way that this figure has been derived. It is unclear as to the extent that this logic will be documented in the Service Definition. We consider it is imperative that the composition of the message volume is understood as other Service Definitions rely upon the Registration volumes in order to define their own metrics, and it should be easy to maintain the relevant figures and ensure that these remain aligned.	The Code Manager can request for the DCC to present Maximum Demand Volumes monthly at the SOIF call. We note the comments on the GRDA Service Definition, and this should be progressed through a subsequent Change Proposal.

	Includes a statement that where the maximum demand volume is regularly exceeded and the CRS Provider has not proactively raised a Change Proposal, the Code Manager will raise a Change Proposal to amend the volumes within the Service Definition. We suggest that this information should be presented at the SOF call on a monthly basis to provide industry visibility of the current volumes. Any changes to these volumes will need impact assessment by all SDSPs and therefore will need to follow full REC Change timelines. *R0092A proposes to remove the average daily volume performance levels and maintain a mean response time of 35 minutes or less at up to peak daily volume and 90th percentile response time of 40 minutes or less.* We are largely ambivalent to removing the distinction between peak and average performance at gate closure, but the GRDA Service Definition requires change as the current SD requires that we perform at average and peak volumes, so this needs to be changed to remove this distinction (otherwise there is a risk that we are required to respond before CSS are required to provide us a message). Given that SLAs are not explicit above peak volumes of Switches, it is appropriate to ensure that the peak Switching Volume (and potentially the Average Switch volume if this is used elsewhere in SLAs) is explicitly maintained in the Service Definition document as identified above.	
Data Communications Company (CRS Provider)	DCC has raised R0092 to work collaboratively with industry, the Authority, RECCo and the Code Manager to develop service levels that are fit for purpose and achievable. We have engaged with industry via	In accordance with Section 11.6 of the Change Management Schedule, a Change Proposal Plan was agreed. This plan was

	the working groups, listened to feedback and adjusted our proposal accordingly. However, we are disappointed at the time taken to progress R0092, and the raising of a competing changes by the Code Manager, who we understood were there to facilitate the progression of R0092. We have escalated our concerns formally to the Authority, but we had hoped to reach an agreement, via R0092, on the most suitable service levels for a high performing service. To date the switching service has achieved the following milestones: • 24 million switch requests (as of 27 February 2024) • Availability across the lifetime of the service of 99.99% • A total switching success rate across the lifetime of the service of 99.99% • A switch time on average of 4 days, when pre-go-live it was between 11 and 21 days. DCC notes that from 1 December 2023 to 29 February 2024, service levels for 6.2 Asynchronous Responses have been met for 2,177 out of a total of 2,179 hours. However, as the DCC is currently subject to 100% service levels, for January and February 2024, DCC has failed the service levels for those months due to response times falling outside of service levels in one hour in each month. DCC advises that for January 2024, the highest hourly mean response time was 5.06 seconds, and for February 2024, it was 4.25 seconds. DCC believes that the R0092 solution meets the criteria set out in the consumer and market participant stories. • Consumer user story: as set out above, we are now delivering an average switch time of 4 days, compared to the previous average of 11 and 21 days prior to this new switching service going live. • Market participant story 1: R0092 proposes service levels which are challenging but achievable and therefore an effective incentive.	briefly delayed due to the P1 Incident where the same team from the DCC were working on this and the R0092 Change Proposal. The DCC took longer than expected to resolve this incident which resulted in a several week delay to the progression of the Change Proposal. The Code Manager, in its impartial role, raised concerns with the proposal that the DCC put forward based on feedback from the Impact Assessment and work group and proposed amendments to the proposed solution and multiple options to address these concerns. The DCC chose not to address the concerns raised by industry and the Code Manager and proceeded to progress its preferred proposal. In accordance with 11.6 of the Change Management Schedule, the Code Manager raised an alternative Change Proposal which is in line with its mandate. We note the headline performance metrics published by the DCC, however, as evidenced within these Change Proposals, these are not the only performance levels the CRS Provider is required to meet. The CRS Provider is required to perform in all service areas including message response times, gate closure and incident resolution.

	Where service levels are unachievable, they no longer act as an incentive. • Market participant story 2: R0092 would ensure that the appropriate service levels are in place to incentivise the effective functioning of the switching service and if these service levels are not met, the commercial impact is proportionate to the detriment experienced by CSS Users and Consumers	

Question 4:	Do you have any comments on the draft legal text for R0092 or R0092A?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	We agree that R0092A legal text is reflective of the CP.	Noted, thank you.
Scottish Power Energy Networks (DNO)	We have not identified any issue with the legal text.	Noted, thank you.
Xoserve (GRDA)	R0092A proposes a 90 percent and 95 percent success rate for P3 and P4 incidents respectively. However, this also proposes a backstop for all incidents that are not resolved within [the normal P3 and P4 resolution SLA] to be resolved within 6 working days for P3 incidents and 20 working days for P4 incidents. We think that the legal text may benefit from a similar clarification as suggested above. Within 6.3 of the CSS switching service definition document, we believe the wording Peak daily volume should read Peak Registration volume.	The Code Manager notes the comment on the Gate Closure definitions and have updated the legal text to point to the relative tables.

	Additionally, under Gate Closure the definitions include y minutes and x seconds – If you are defining something as x seconds, a reference needs to be made to the calculation. Currently it isn't related to any tables etc. Given that this is now a specific target, it should be documented as such.	
Data Communications Company (CRS Provider)	No, we do not have any comments on the draft legal text for both proposals. The draft legal text delivers the proposed solution for each change proposal respectively.	Noted, thank you.

Question 5:	Do you agree with the Code Manager's assessment that neither R0092 nor R0092A will result in additional costs, than would otherwise be the case for the DCC to improve its performance to existing service levels if the status quo were to be retained?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	We agree that additional costs are not resultant of these CPs. However, we would question the assumption that the DCC would be able to charge to improve their service. Both of these CPs allow the DCC to amend the service which is being delivered, rather than being held to account by the standards which were set and agreed to previously. The CP states that 'both R0092 and R0092A wholly and exclusively propose a reduction in the current service levels that apply to the CRS Provider. The CRS Provider has been clear that REC Parties would not see a reduction in costs or return of funds.' It is our understanding that REC Parties are expected to pay for an identified reduction in the same	In its consultation response, the DCC has confirmed that it would not anticipate additional costs for R0092, however, have not confirmed the same for R0092A.

	manner in which we are currently paying, and in terms of a cost/benefit analysis this infers higher cost/lesser service.	
Scottish Power Energy Networks (DNO)	We have seen no evidence to indicate that the implementation of these changes would result in significant costs.	Noted, thank you.
Xoserve (GRDA)	We agree at this stage no additional costs should be incurred. However, this would need to be monitored and revisited if switching volumes increase beyond the suggested level. Service providers may need to undertake impact assessments if the numbers increase.	Noted, thank you.
Data Communications Company (CRS Provider)	No, we disagree with the Code Manager's assessment that neither R0092 nor R0092A will result in additional costs. The R0092A proposal to introduce maximum incident response/resolution times for priority 3 and 4 incidents is a new requirement that was introduced in February 2024, and DCC was not given the opportunity to assess the impact before it was issued for consultation. DCC can confirm that implementing the changes in R0092 will not incur any additional costs.	The existing requirement in the REC is for 100% of Switching Incidents to be resolved within the current timescales. R0092A proposes that a lower proportion of Switching Incidents must be met in the same timetables and provides the CRS Provider additional time (which it does not have today) to resolve the remaining incidents. The impact assessment for R0092 included reference to maximum timescales being included in the proposal, and asked a specific question *"If a maximum timescale were incorporated, what do you feel this should be? Consider the maximum response/resolution time prior to this causing a risk to your organisation."* The Code Manager welcomes confirmation that R0092 would not incur additional costs.

Question 6:	Do you agree with the proposed Change Path, that both R0092 and R0092A should be subject to Authority determination?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	Agreed.	Noted, thank you.
Scottish Power Energy Networks (DNO)	Yes.	Noted, thank you.
Xoserve (GRDA)	We agree with the proposed Change path and the authority determination.	Noted, thank you.
Data Communications Company (CRS Provider)	Yes, we agree with the proposed change path for both change proposals to be authority determined. It would not be appropriate for R0092A to be approved because DCC has not had the opportunity to assess the impact of it nor has there been sufficient discussion of this proposal in the working groups.	All aspects of the solution proposed on R0092A were either included in the original R0092 impact assessment or relate to the existing obligations which apply to the CRS Provider today.

Question 7:	Do you agree with the Code Manager's assessment of each proposal against the REC Objectives? Please explain your reasoning for either agreement or disagreement with each REC Objective.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	Agreed.	Noted, thank you.

Scottish Power Energy Networks (DNO)	We agree with the Code managers assessment of each proposal against the objectives. We believe that it is in the best interests of the customer and Industry parties that adequate controls are in place for the monitoring of asynchronous messages in their totality, and for the resolution of priority 3 and 4 queries within a timely manner.	Noted, thank you.
Xoserve (GRDA)	*92* • *To ensure the REC operates and evolves in a manner that facilitates the achievement of its mission statement1.* • *To ensure customers interests and data is protected in the operation of the REC.* We agree with the Code managers assessment of the above two objectives – We have previously voiced our nervousness at relaxing the targets which would impact Gate closure and the relaxing of resolution times for incidents – both of which would impact the switching journey. • *To drive continuous improvements and efficiencies in the operation of the REC and the central systems and communication infrastructures it governs* We agree with the need for continuous improvement and improving processes. With regards to the proposal set out in R0092, we agree that the proposal would cause a possible detriment to Consumers and End users and therefore are in agreement with the code managers assessment. *R0092A*	Noted, thank you.

	• *To ensure the REC operates and evolves in a manner that facilitates the achievement of its mission statement.* • *To ensure customers interests and data is protected in the operation of the REC.* • *To drive continuous improvements and efficiencies in the operation of the REC and the central systems and communication infrastructures it governs* Whilst we agree in principle with the code managers assessment of the above three objectives, we believe that monitoring needs to remain in place to ensure that the proposed minimum standards of service for CSS Users is maintained to ensure the process runs as smoothly as possible.	
Data Communications Company (CRS Provider)	No, we disagree with the Code Manager's assessment of each proposal against the REC objectives. Please see our assessment against the REC objectives below. **R0092** Objective (a) is to achieve the mission statement – positive. R0092 delivers a more effective incentive to DCC and therefore further supports the mission. R0092 will not result in a reduction of service. Adding in the requirement to keep service levels under review further supports the mission to ensure that incentives continue to be effective. Objective (b) is to protect customers and data – no impact. R0092 would have no impact to this objective since service levels do not impact data or customer protection. Objective (c) is to drive continue improvements and efficiencies – positive. As explained above, R0092 will improve the quality of incentives. Furthermore, it is important to note that we are now c.1 year and 8 months into the operation of the live switching service meaning the service levels were developed c.5 years and 9 months ago. DCC	The Code Manager notes the DCC's disagreement, however, has not identified any details or evidence in the response that would require a revision of its assessment.

	requested for the service levels to be reviewed ahead of the implementation of R0025, and again before the implementation of the SIR, both in 2022. We continue to believe that it is in all parties' interest that the service levels are kept under review as the service matures. This is entirely consistent with the objective for continuous improvement. **R0092A** Objective (a) is to achieve the mission statement – negative. R0092A proposes an unachievable set of service levels and therefore would result in an ineffective incentive regime. Objective (b) is to protect customers and data – negative. Generally, R0092A would have no impact on this objective since service levels do not impact data or customer protection. However, R0092A would potentially increase costs for no benefit which is not in customers' interest. Objective (c) is to drive continue improvements and efficiencies – negative. As set out above R0092A does not improve the incentive regime and so it does not deliver against this objective.	

Question 8:	Do you agree with the Code Manager's recommendation that the Authority should reject R0092, and approve R0092A? Please explain your reasoning.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	As outlined throughout this response – it is favourable to accept R0092A and reject R0092.	Noted, thank you.

Scottish Power Energy Networks (DNO)	Yes.	Noted, thank you.
Xoserve (GRDA)	We support the decisions made by the code manager in rejecting R0092 and accepting R0092A. We believe that this offers more protection to the switching journey for the end consumer.	Noted, thank you.
Data Communications Company (CRS Provider)	No. We disagree and as the Proposer of R0092, DCC is disappointed that the Code Manager recommends that R0092 is rejected. We are concerned that this recommendation conflicts with the Code Manager's responsibility to remain impartial. DCC notes that under Code Administrator Code of Practice (CACoP) Principle 7, the guidance states that the proposed and alternative solution are developed and assessed to the same degree. DCC notes that R0092A was raised extremely late in the R0092 timeline. DCC has had insufficient time to fully impact assess the changes proposed, compared to a full impact assessment being carried out for R0092. Principle 7 also states that the Code Administrator should ensure alternative proposals are raised prior to or during the 'Workgroup' stage, whereas R0092A was raised following the conclusion of the working groups. DCC acknowledges that the CACoP applies to Code Administrators, however clause 7.4 of the REC main body requires the Code Manager to comply with the CACoP and perform tasks and functions in a manner consistent with its principles.	Section 17 of the REC Change Management Schedule sets out that any person may raise an Alternative Change Proposal prior to the publication of the Preliminary Change Report, subject to the Code Manager's grounds for rejecting an Alternative Change Proposal. All aspects of the solution proposed on R0092A were either included in the original R0092 impact assessment or relate to the existing obligations which apply to the CRS Provider today.

Question 9:	Do you agree with the proposed implementation date?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**

National Grid Electricity Distribution (DNO)	Agreed.	Noted, thank you.
Scottish Power Energy Networks (DNO)	We have no issue with the implementation date.	Noted, thank you.
Xoserve (GRDA)	We support the decisions made by the code manager in rejecting R0092 and accepting R0092A. We believe that this offers more protection to the switching journey for the end consumer.	Noted, thank you.
Data Communications Company (CRS Provider)	No, because we disagree with the proposed implementation approach and date. Should R0092 be approved then DCC can implement the required changes quickly with minimal system changes. Therefore, we would recommend an earlier release date, and for the changes to be backdated to 1 April 2023, when the SIR commenced.	The REC does not support a retrospective release date for REC change proposals. The CRS Provider is responsible for delivering against their defined service levels in the code until any Change Proposal impacting these is implemented.

Question 10:	Do you have any further comments on this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	We do not feel that 'The improvements required by the DCC to achieve the revised service levels would be greater than that of R0092' is a drawback of R0092A (page 16 PCR) – The DCC enacting improvements cannot be viewed as a drawback of either CP.	Noted, thank you.
Scottish Power Energy Networks (DNO)	No.	-

Xoserve (GRDA)	n/a	-
Data Communications Company (CRS Provider)	As stated above, DCC does not agree with the R0092A proposed solution and the way it was raised. However, it is worth noting the fact that the Code Manager has raised a proposal to amend the current service levels corroborates that the current service levels are not fit for purpose and require amending.	Code Manager has not stated that the current service levels are not fit for purpose as evidenced in its proposal R0092A, some remain unchanged. The Code Manager has set out its views against each of the service levels within the Preliminary Change Report and where it feels that a change is appropriate.