RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0137 – INTRODUCING THIRD PARTY INTERMEDIARY (ENERGY BROKER) ASSURANCE AND ACCREDITATION

R0137A - INTRODUCING THIRD PARTY INTERMEDIARY (ENERGY BROKER) ASSURANCE AND ACCREDITATION (ALTERNATE)

On 17 October 2024 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0137 and R0137A – Introducing Third Party Intermediary (Energy Broker) Assurance and Accreditation.

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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LEAD ANALYST	Caroline Freimuller

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Question 1:	Do you agree with the proposed solution for R0137A? If not or if you prefer the solution of R0137, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Citizens Advice (Consumer Body)	Yes, we agree with the proposed solution for R0137A.	Thank you for your comments.
Petrius Energy and Water Ltd (Third Party Intermediary)	I do not agree with R0137A due to the following reasons: The costs are unclear License obligations for suppliers remain the same There is a lot of administrative work involved, particularly for 1-man-band brokerages I strongly disagree with the "race to the bottom" comments RECCo does not have the jurisdiction over TPI's operations I also don't agree with R0137 due to the following reasons: There would be serious conflicts of interest if energy suppliers were appointed as accreditation bodies and again, the administrative burden on TPI's would be significant	Thank you for your comments. The Code Manager and RECCo have provided indicative costs for TPIs to register with the REC Services Accreditation Scheme in the Change Report. The Code Manager appreciates the administrative work involved for TPIs but feels the cost does not outweigh the benefits this will provide for Non-Domestic Consumers.
Drax Group (Energy Supplier)	As set out in our response to the IA for R0137, we have a number of concerns with the multiple accreditation scheme approach, so the alternative (R0137A) solution is an improvement. Nevertheless, we do	Thank you for your comments.

	not agree with either solution as we don't support the introduction of a proxy-regulatory regime. Accountability for TPI behaviour should rest with TPIs, not suppliers. We support TPI regulation carried out by an appointed regulatory authority (e.g. Ofgem) afforded specific powers by Government, as proposed by DESNZ in its open consultation. We are unconvinced that the REC proposals would have the "teeth" to make a difference and the deterrent effect is likely to be very diluted with this approach, compared to a regime governed by Ofgem with the powers to levy appropriate penalties and with consequences for a TPI's reputation. Moreover, the proposed arrangements will not protect those consumers who currently pay TPIs directly, and there is a very real risk that these proposals will incentivise TPIs to move to that payment model over time, thereby increasing the number of consumers left unprotected. Our strong preference is for a whole-of-market, future-proofed approach with legally enforceable consequences that doesn't carry a risk of legal challenge.	
EDF (Energy Supplier)	We note on 20 September, DESNZ has opened a consultation proposing a general authorisation regime for the direct regulation of Third-Party Intermediaries by an appointed regulator. EDF supports DESNZ' proposal. We note the original problem statement for which R0137 was conceived to address is explicitly captured within the scope of the Government's proposals, both in terms of standards for transparency, and the TPI roles. Contrary to the assumption set down in the change document (R0137.A001), should DESNZ proceed as per its proposal, the changes proposed by R0137 and R0137A will be redundant. There is no longer a	Thank you for your comments. It will be within Ofgem's gift to determine the appropriate time to make a decision on this Change Proposal, and this may be after the DESNZ consultation outcomes have been published.

	valid case for change. As such, we do not expect it will be necessary for either of these changes to proceed to implementation. REC has previously stated that the approved change will go to Ofgem for the authority's decision. EDF strongly recommends that the approved change should be paused until the government response to the Regulating TPIs consultation is published, and the roadmap and timeline to direct regulation is clarified. We do not support continuing with either proposed change in terms of development or preparations for implementation. We do not support the implementation of either change as an interim measure prior to the commencement of any actions set out by the Government. We urge pragmatism on the part of REC and Ofgem to prevent wasted effort, cost, and the unnecessary deployment of supplier and TPI resources by proceeding with a redundant implementation process. Without prejudice to our primary position above, the alternative change proposal, R0137A better reflects our previous feedback during the Impact Assessment stage of this change process.	
Anonymous (Third Party Intermediary)	We are pleased to see that following the impact assessment, RECCo have proposed the alternative solution R0137A, which aims to promote a consistent approach to accreditation. We strongly believe this is required to avoid a multiple tier system which could give rise to inconsistent TPI standards and potentially result in customer harm. On this basis, our response below relates to R0137A only.	Thank you for your comments.
Bryt Energy (Energy Supplier)	Yes - R0137A is more preferable to R0137 as we agree that only having one route to accreditation is desirable.	Thank you for your comments.

SSE Energy Supply (Energy Supplier)	Out of the two options, we prefer R0137A, however it should be noted that we believe only direct regulation is the most appropriate regime for TPI's. We appreciate there is a need for change within the TPI market, but as REC are aware, there is currently a consultation out from DESNZ regarding direct regulation, which we favour. The proposed regulation could see RECCo and DESNZ working in parallel, but we are concerned that any significant amount of change within the REC would not be beneficial at this time. We believe that it would be more prudent to leave the current voluntary schedule in place, as is and once a decision is made on the DESNZ consultation, REC can resume work in this area.	Thank you for your comments. It will be within Ofgem's gift to determine the appropriate time to make a decision on this Change Proposal, and this may be after the DESNZ consultation outcomes have been published.
Centrica (Energy Supplier)	As stated within our response to the impact assessment for this change, we welcome the opportunity to review and respond to the proposed solution for a mandatory Third-Party Intermediaries (TPI) code of Practice. TPI's have a key role to play in the non-domestic market. We are therefore supportive of the solution laid out in R0137A, which creates a consistent approach to accreditation, under a singular framework. This removes previous concerns of the potential for a 'race to the bottom' for the easiest scheme to register with. Any proposed solution should look to improve practices that cause detriment to customers and drive-up behaviour in the market. We are still unclear how the minimum standard in the code of practice would drive better outcomes for customers, as the audit and enforcement regime does not seem sufficiently effective enough to improve Broker practices, other than prohibiting suppliers from working with Brokers. One way in which this could be achieved is through strengthening the audit requirements to every two years, ensuring	Thank you for your comments.

	standards are maintained across the non-domestic market. REC has not provided the details required on how the enforcement process would be implemented, how much due process is given to a broker before action is taken and what are the scale of the actions and consequences are, other than prohibiting suppliers working with Brokers, given this is a code for TPI's to adhere to. Any such process needs to set out a clear enforcement procedure, actions and consequences, including pre-removal from the scheme. The Energy Market is more complex today and as energy brokers are evolving their services, we welcome the recent publication of a consultation on this subject by DESNZ. Some broker practices that cause customer detriment cannot be controlled by suppliers. Introducing direct regulation of energy brokers is the only effective and enduring way to ensure that customers are treated fairly across all their interactions and would align with broker regulation in other sectors, for example mortgage brokers. We fully support Direct Regulation as a simpler, more transparent route to placing brokers on the same standing as suppliers in protecting customer interests. RECCo need to assure stakeholders that this proposal is in full alignment with any proposed content contained within an authorisation regime or direct regulation outcome following the active consultation. Failure to do this will provide additional complications in the non-domestic market, both for TPI's and suppliers.	
Jutton Associates Limited (Third Party Intermediary)	Yes – subject to comments below: The term intermediary is used to include PCW services, TPIs, Brokers and Consultants etc **How many routes to registration should there be?**	Thank you for your comments. The scope of this Change Proposal is the entire Non-Domestic market, so it purposefully has not been segmented into

	One only – RECCO could be the body managing this or another organisation. Provided this body is independent of either energy suppliers or intermediaries. We will send a response to the consultation being conducted in parallel by DESNZ – it will make the same point. **Roles of Energy Suppliers** Intermediaries are agents of the consumers of energy and not of the suppliers of it. Therefore, under no circumstances should energy suppliers be allowed any control over the registration or audit process. This would be a clear conflict of interest and to the detriment of consumers. Energy suppliers should be free to choose which intermediaries they will make contract offers to (subject to their being registered). They should however respect a written instruction (i.e. an LOA) from their customers to nominate any registered intermediary to resolve service failures or simply gather information about contract status, consumption, metering etc. Otherwise, consumer choice would be limited and harm caused to those needing help managing their energy suppliers. **Statement of the "problem"** The fact that non-domestic consumers have fewer protections is simply that. It is not a "problem", as you imply – rather a statement of the obvious fact that fewer protections are appropriate or required. The micro-business protections (along with the newly extended small business definition) already cover small organisations who expect similar licensing protection to residential consumers.	Micro-businesses, Small and Medium Consumers and I&C Consumers. The Code Manager is aware that TPIs provide many services above and beyond Energy Contracts for Consumers, but it is only this which is in scope of this Change.

	There is no defence of the worst behaviour of some intermediaries. Until recently, the ease of concealing commission levels has allowed the unscrupulous to act solely in their own interests to the detriment of consumers. However, the new requirement to disclose fees at the point of signature should mean that these predatory organisations will soon move into some other industry. **Segmentation of the energy market and intermediaries for regulation purposes** Your proposals and any code of practice would be improved by better segmentation of both energy consumers and the intermediaries serving them. Residential Market For example, you refer to protection for vulnerable customers - who are they? Is this term limited to the residential market? If so, there need be nothing specified in the requirements for the non-residential market. Micro and Small Business Using the same example of vulnerable customers – are they a subset of the micro and small business market? If so, there need be nothing specified in the requirements for consumers outside this market segment. I&C Market	

	Taking this term to mean any consumer not in either of the two segments above (although it covers a wide variety of organisations). Any legislation or code of practice should recognise that fewer protections are required or are appropriate for this class of consumer. This should include the public and private sector along with charities and other voluntary or non-profit organisations (if they are not otherwise included in the smaller categories). Without proper clarity over which segment a consumer belongs to, there will be confusion over which regulations covers them and which protections they do and do not have. **Services provided to corporate clients** Any legislation or code should recognise that many corporate consumers require services from intermediaries that go well beyond conducting price comparisons. In addition, for these clients payment is often by direct fee. Typically, consumers in this category will require many or all the following: • Regular market price and regulatory insights. • Energy budget setting and monitoring. • Carbon management and reporting. • Network and metering arrangements for new developments. • Management reporting for energy. • Management (and procurement) of flexible energy contracts.	

	• Tendering for energy contracts – analysis of pricing and contract terms offered. • Resolution of service failures by energy suppliers. The list is far from exhaustive but is included to illustrate that energy suppliers are not directly involved in much of what is provided to our customers. Most of our clients are corporates who pay us directly under a contract negotiated between us. Arguably this arrangement – common in the corporate sector, need not be subject to legislation at all. Where we are paid through commission (some customers prefer it) the amount is part of our negotiated contract the customer and is therefore an agreed price for the services provided.	
Business Energy Direct UK (Third Party Intermediary)	We have confirmed in our previous feedback to RECCo that we don't agree with multiple parties being able to accredit TPI's under the TPI CoP. We have concerns pertaining to suppliers doing so because of the potential conflict of interest given that TPIs provide suppliers with contract customer. For example, we are aware that some companies operate simultaneously as an energy supplier and as an energy consultancy / TPI, therefore this is the very definition of a conflict of interest.	Thank you for your comments.
ENGIE (Energy Supplier)	Our preference is for R0137A. We agree with the proposer of R0137A that having a single route for accreditation will provide a level playing field for accreditation. Removing the option of providing accreditation through equivalent bodes will also reduce the overall burden of administration on market participants and reduce the overall complexity of the arrangements. It will also ensure that consumers can have	Thank you for your comments.

	confidence that TPIs they are dealing with are accredited by a central body rather than having to determine whether they have an equivalent accreditation.	
Utilities Intermediaries Association (Trade Association)	No, the UIA does not agree with the proposed solution for R0137A for the following reasons: • **Lack of Legal Authority**: RECCo does not have the legal vires to mandate a single Code of Practice (CoP). Granting RECCo powers that could determine a TPI's ability to operate, despite lacking statutory jurisdiction over TPIs, risks breaching competition law. • **Suppliers' License Obligations Remain Unchanged**: The proposed approach does not address or reduce the existing license obligations of energy suppliers. • **Unsubstantiated Claims**: The argument that a single accredited body would prevent a "race to the bottom" is speculative and unsupported by evidence. This approach risks creating an anti-competitive environment without a clear justification. • **Unclear Cost Implications**: The cost implications for TPIs are inadequately detailed. Additionally, the concept of "light-touch" annual audits appears primarily intended to satisfy supplier interests but may disregard the significant practical impacts on TPIs and their support chains. • **Increased Administrative Burden and Cost**: Requiring TPIs to comply with both RECCo's TPI Code of Practice and the Broker ADR scheme would add costs and administrative burdens, posing particular challenges for smaller TPIs.	Thank you for your comments.

	Concerns with R0137: While R0137 allows for multiple accredited bodies, it still requires RECCo's prior approval, a power RECCo does not possess. Furthermore, RECCo's suggestion that energy suppliers could act as accreditation bodies raises serious concerns about conflicts of interest. Allowing suppliers to influence TPI behaviour risks compromising impartiality and distorting market dynamics, suggesting a lack of understanding from RECCo regarding the TPI-supplier relationship. Both proposals appear misaligned with DESNZ's consultation on TPI regulation and could hinder progress by ignoring widespread calls for robust TPI regulation. They impose undue complexity and burdens on TPIs without delivering clear industry benefits.	
Anonymous (Third Party Intermediary)	Many TPI's in the industry have underwent vast change to promote regulatory compliance in areas such as operational processes, team expansion, and education of key stakeholders. R0137 - The proposal was not preferred for the following reasons: - Repetitive notes of "supplier minimum requirements" with no distinct explanation of a standard that they would have to adhere to. Furthermore, noting that "non-domestic suppliers would not be prohibited from adding any additional requirements as they see fit" could create inconsistencies and uncertainty in contractual terms, could increase costs for TPi's and brokers if any changes are imposed, increased varies practises across all suppliers which can cause difficulty and conflicts amongst TPI's who have multiple supplier relationships.	Thank you for your comments.

	R0137A – This proposal is not preferred for the following reason: - The additional cost that arises here is questionable. Where I understand that there is a cost to auditing conducts, many TPI's, suppliers, etc, would have implemented such processes/software's/members of staff that cover compliance roles and auditing activities. A large cost has already been imposed on the industry as a whole with the changes that were required of TPI's and the ADR scheme, and this is an additional cost on top. Furthermore, it poses issues of redundancies in processes and roles that have been created to ensure a more stringent handle on compliance. I think there would be further economic concerns of redundancies across compliance in the industry.	
Scottish Power Energy Retail (Energy Supplier)	We believe it is imperative that appropriate regulation be established for Third Party Intermediaries (TPIs) in the energy sector – and, in particular, energy brokers. We note that energy brokers primarily operate in the non-domestic retail market. While many TPIs trade fairly and work to high standards, we continue to see rogue TPIs operating in the market, to the detriment of energy consumers and the industry as whole. In that context, we welcome this conversation on how to enhance consumer protection in the TPI market. As the same time, we believe it is essential that the overall framework for the regulation of TPIs, across legislation, the energy supply licences and industry codes, be taken into account and that this framework be effective, proportionate and streamlined. In particular, we note that the Government published a recent consultation, Regulating Third-Party Intermediaries in the Retail Energy Market, on 20 September 2024. That consultation proposes introducing the direct regulation of TPIs (for	Thank you for your comments.

	energy brokers and other TPIs) for domestic and non-domestic consumers. We support direct regulation of TPIs as the best way to ensure that all TPIs adhere to an established set of standards and are held accountable for their actions by a regulator, where warranted. We note that the Government has proposed a "general authorisation" regime for a new TPI regulatory regime. At the same time, we also note that the Government is open to alternatives and we understand that proposals will be made for a "specific authorisation" regime, whether for energy brokers specifically or all TPIs within scope generally. In the latter case, relevant TPIs would need to be registered with or authorised by the regulator (or both) in order to operate in the market. We support that approach. In its TPI direct regulation consultation document, the Government states that: "Any new regulatory option would be expected to replace current rules set out by voluntary Codes of Practices, so as to avoid a complex landscape with overlapping rules." We agree with that sentiment and we consider the REC TPI Code of Practice to fall within that definition. In addition, we observe that five of the six design principles for the Government's TPI regulation proposal are largely derived from the REC TPI Code of Practice. In our view, the fact that (1) the Government's proposed TPI regulatory regime and (2) the REC TPI Code of Practice and the proposed TPI accreditation regime share nearly identical principles demonstrates that only one is needed – the Government's direct regulation regime. Beyond fostering a higher standard of consumer protection in the TPI market, direct regulation would also support the simplification of the overall framework for the regulation of TPIs. In our view, a new TPI direct regulatory regime	

	would render indirect regulation of TPIs via suppliers both unnecessary and excessive. It would be duplicative to mandate suppliers to work with accredited energy brokers (or, indeed, to operate an accreditation regime at all) when all energy brokers (and other TPIs) would be required to be registered with or authorised by the regulator as part of the TPI regulatory regime. While we appreciate the spirit of this proposal, and the work dedicated to it, we believe the prospective direct regulation of TPIs through legislation and a regulator (which the Government has suggested be Ofgem – and we support that suggestion) renders a REC TPI accreditation regime unnecessary. To support better regulation and to ensure that the overall framework for the regulation of TPIs is effective, proportionate and streamlined, we believe that this proposal should not be taken forward. Nevertheless, in line with our response to the party impact assessment, should it ultimately be taken forward, we believe that that RECCo (or its agent) should be the sole TPI accreditation body – and, in turn, we would be more supportive of R0137A than R0137, noting our reservations set out above.	
SEFE (Energy Supplier)	We **agree** with the proposed solution for both R0137 and R0137A We **prefer R0137A** subject to their being no material competition concerns	Thank you for your comments.

Question 2:	Do you any comments on the revised Performance Assurance requirements?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Citizens Advice (Consumer Body)	No comments.	n/a
Petrius Energy and Water Ltd (Third Party Intermediary)	The administrative burdens and costs to TPIs has become far too great and the change seems more focused on reassuring suppliers than addressing TPI operations, implying a lack of trust in TPIs' ability to uphold standards. Furthermore, I don't believe it will actually help to improve compliance or market protections.	Thank you for your comments.
Drax Group (Energy Supplier)	While we appreciate the Code Manager taking on board feedback from the R0137 IA and incorporating the required data into the existing Gaining Supplier Switching Data report (ref 1431), we remain of the view that the level of data exceeds what should be required to determine suppliers' compliance/ performance against the requirements. If the obligation on suppliers is to identify whether a TPI is listed as accredited before entering into a contract with a consumer via that TPI, we see no justification for MPAN level data. Furthermore, as a number of suppliers do not submit current REC PARC reports with MPAN level data (including 1431) because of data protection concerns, we presume they wouldn't submit new reports either. If this is the case, REC would only be monitoring compliance of a subset of suppliers, so not all suppliers would be held to account for any	Thank you for your comments. The Code Manager notes that not all Parties are submitting their required Performance Assurance reports, and this is being addressed separately via the PAB.

	failings. We therefore don't believe the proposed approach to performance assurance would be effective or fair.	
EDF (Energy Supplier)	REC's approach to reporting and monitoring requirements for this change, and the tangentially associated change R0155, remain unduly onerous and unnecessarily granular. We note the Performance Assurance Board has not been provided with the opportunity to consider its previous position in light of supplier feedback. We urge REC to enable the PAB to reassess the proposed performance assurance measures to ensure the out-turned obligations are reasonable and appropriate. In the context of our broader objections to continued development of this change, and the Government's progress on the direct regulation of TPIs, suppliers and TPIs must not be subject to the uncertainty and resource drain which would be precipitated by a steer to proceed with system change or other development work associated with this change proposal.	Thank you for your comments. This Change was presented at October PAB to allow the PAB the opportunity to feed into this Change if they wished. No feedback was submitted to the Code Manager.
Anonymous (Third Party Intermediary)	n/a	n/a
Bryt Energy (Energy Supplier)	We agree that adding to an existing report rather than creating a new requirement is a sensible approach and we don't foresee any issues with providing this initial data.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We welcome the decision to reduce the additional reporting proposals and adding the extra information into existing report.	Thank you for your comments.
Centrica (Energy Supplier)	The performance assurance catalogue not in line with the level of detail we provide to the RECCo, and we would consider onerous for this	Thank you for your comments.

	change. Data protection considerations are also required when more customer data is being requested than RECCo currently receives. Providing data to the RECCo was a concern that we have raised during working groups for other change proposals, due to lack of clarity around the authority the Retail Energy Code has to request data at this level . As the reporting catalogue requires submission of data at an MPXN level, our concerns remain over the controls that are in place to ensure customer data is held compliantly and securely. Our understanding is that this matter has been raised with the ICO and await further guidance on solutions to our concerns. In addition, the level of detail contained within performance assurance catalogue the goes beyond the SLC requirement and primary intention of this change. That being that suppliers only enter into contracts with customers via a TPI that is accredited. It is our position that a demonstration of this by providing a listing of TPIs that we have entered a customer contract through, would be sufficient to demonstrate compliance with this proposal. It is our position that anything beyond this should be provided to REC by the TPI at point of accreditation or re-accreditation, with the only burden placed on suppliers being to ensure they only work with accredited TPIs.	
Jutton Associates Limited (Third Party Intermediary)	See question 1.	Thank you for your comments.
Business Energy Direct UK (Third Party Intermediary)	n/a to TPI	n/a
ENGIE (Energy Supplier)	It makes sense to extend the content of the 1431 report to include the TPI information but timelines for being able to report on this information	Thank you for your comments.

	are driven by mining the data rather than the format of the reporting, so we still see the need for at least a 9-month lead time.	
Utilities Intermediaries Association (Trade Association)	The revised Performance Assurance requirements have introduced additional burdens on TPIs. What was already a laborious process—requiring TPIs to submit extensive documentation to support their application for accreditation and undergo periodic audits every 2 to 5 years, has now become even more demanding with the requirement for annual accreditation renewal. This change raises the question: **Who does this provide comfort to?** It appears to prioritise assurance for suppliers rather than considering the operational impact on TPIs. The annual renewal requirement implies a lack of trust that TPIs are maintaining standards, despite the existing framework's rigorous auditing cycle. This shift in requirements adds unnecessary complexity and administrative strain without clear evidence that it will improve compliance or enhance protections within the market.	Thank you for your comments. The Code Manager would like to note there are no Performance Assurance requirements on TPIs as they are not REC Parties, these only refer to the reports Energy Suppliers will be required to submit to show their adherence to the new REC Schedule. However, all comments are noted in reference to the requirements for TPIs for registering under the REC Services Accreditation Scheme. The addition of the annual renewal was due to several Parties concerns that up to five years between audits was too long a period, and this reduces the burden on TPIs compared to a full annual audit.
Anonymous (Third Party Intermediary)	I disagree with the Performance Assurance Requirements – reliance on the Energy Supplier to include a TPI Name and TPI Accreditation number is not reasonable. This can lead to the issue of human error, of which agents could inadvertently provide incorrect information, thus causing detriment to the process. Furthermore, it can often be the case that some suppliers do not have up to date records, using previous TPI information as opposed to updates ones. This could cause severe	Thank you for your comments.

	issues for all parties involved, including TPI's, Suppliers and the customer.	
Scottish Power Energy Retail (Energy Supplier)	As stated in our response to Question 1, we do not believe that this proposal should be taken forward, in view of the Government's proposed introduction of direct regulation of TPIs. However, we welcome the streamlining of the indicative Performance Assurance (PA) requirements for this proposal since the party impact assessment. We believe that any PA requirements should be both appropriate for and proportionate to the subject matter for assurance. Here, it would be appropriate and proportionate to institute more streamlined reporting by suppliers in relation to the proposed REC schedule.	Thank you for your comments.
SEFE (Energy Supplier)	We **welcome the simplified reporting** requirements. We would like to confirm how quickly the relevant TPI information will appear on the register so we can access to the accreditation information in a timely fashion. We would like to clarify why both the TPI Name and the TPI Accreditation Number are required and to what extent they are cross validated e.g. for TPI names, do they need to be as defined on the register? If so, this could cause an issue with systems maximum field counts being different, so we would need to transform the data for example if it had been truncated. **For these reasons we would prefer, for reporting purposes, to just provide the TPI Accreditation Number.**	Thank you for your comments. RECCo expect the TPI Accreditation Register to updated daily via the API and a minimum of weekly on the webpage. The Code Manager has taken these comments on board and amended the PARC to only include TPI Accreditation Number.

Question 3:	Do you have any comments on the proposed legal text for either R0137 or R0137A?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Citizens Advice (Consumer Body)	No comments.	n/a
Petrius Energy and Water Ltd (Third Party Intermediary)	No.	n/a
Drax Group (Energy Supplier)	Our comments on the accompanying documents are below. Proposed revised wording marked up in red. Schedule As highlighted in our response to the R0137 IA: **Clause 5.2** states that *Energy Suppliers, RECCo and the REC PAB shall co-operate as required to ensure the procedures set out in the RECCo TPI RoP and the PAB Procedures are upheld, and shall use reasonable endeavours to ensure that other relevant parties (such as applicants for accreditation under the REC Services Accreditation Scheme, Accredited TPIs and TPI Accreditation Auditors) comply with such procedures (as relevant to them)* – This misrepresents the relationship suppliers have with TPIs. Suppliers do not have leverage over TPIs and their operations, which is precisely why there is a need for regulation of TPIs. It is unreasonable and inappropriate to place	Thank you for your comments. RECCo as the Proposer made the decision at Impact Assessment to leave Energy Suppliers in clause 5.2 as they will be required to abide by this Schedule and any decisions made by PAB in regards to a TPIs accreditation status. The Code Manager takes these comments on board regarding the CoP, but making amendments to the TPI CoP is out of scope for this change. RECCo plan to do a thorough review of the TPI CoP while it is still a Category 3 document, and this has been fed back for potential inclusion into that review.

	obligations on suppliers to ensure the compliance of third parties acting independently. <u>Definitions</u> The definition of a TPI (and its application in the Code) has to change slightly to be more narrowly and exclusively focused on licensed energy supply activity, rather than capturing any other products or services that suppliers may offer to our supply customers (such as, EV propositions, optimisation services, energy efficiency advice/services, etc.) – Proposed revised wording - "a Third Party Intermediary (TPI) is an organisation or individual that, either on its own or through arrangements with other organisations or individuals, provides information and/or advice to a Non-Domestic Consumer about an Energy Supplier's licensed energy supply charges ~~and/~~or ~~other~~ associated terms and conditions and whose payment or other consideration for doing so is made or processed by that Energy Supplier." <u>CoP Appendix</u> First item in Principle 3 should be changed to read – "The TPI must ensure that the energy supply contract which it recommends to a Consumer is suitable for that Consumer based on the information the Consumer has provided or information that the TPI should reasonably be expected to be aware of." Fourth item in Principle 4 needs to change as it currently [inadvertently] excludes microbusinesses - Under the Redress Order 2008 as amended by Order 2024, you cannot strictly be defined as both a SBC ('not a relevant consumer') and a MB ('relevant consumer') – "For Consumers who qualify as Small Business Consumers or as micro	

	business consumers (as defined in Ofgem's energy supply licences), the TPI must ensure that they are signed-up to a qualifying Alternative Dispute Resolution scheme, and that details of the scheme and the TPI's membership number are included in the TPI's contract with the Consumer and other key communications from the TPI to the Consumer."	
EDF (Energy Supplier)	No comments.	n/a
Anonymous (Third Party Intermediary)	We note 12.3 within R0137A still contains an active reference to the Industry-Recognised Accreditation Body. Whilst this appears to be an oversight, we wanted to highlight this to ensure it is removed.	Thank you for your comments. The Code Manager has made this correction.
Bryt Energy (Energy Supplier)	Our main comment is whether the wording on both the proposed schedule and COP is clear on the definition of what a TPI is and whether this aligns with the stated 'types of TPI' that DESNZ are considering will fall under their potential general authorisation regime on TPI regulation. Therefore, we think that REC should review this wording accordingly.	Thank you for your comments. The proposed definition of TPI under the REC can be found in the draft Schedule 1 – Interpretation and Definitions provided within the legal text for this change.
SSE Energy Supply (Energy Supplier)	Charging Methodology – Each section of the charging methodology refers to who is responsible for paying for each service (Supplier/DNO/MEM etc). It is not clear within the TPI section, who REC will recover these charges from, therefore we propose to make an amendment to the legal text, as follows – 10.1. The costs of operating and maintaining the accreditation scheme shall be recovered from TPI's. RECCo will recover such accreditation charges in order to fund the TPI Accreditation Service only. These charges will not be used for funding of any other REC Service.	Thank you for your comments.

	10.2. The TPI Audit Fees will be charged directly from the RECCo appointed TPI Auditor. TPI Audit fees are paid before the commencement of TPI Audit work. 10.3. The frequency of TPI Audits is set out in the TPI REC Schedule available on the REC Portal. Charging statement – As with our comments for the charging methodology, the charging statement should also be amended to reflect who is responsible for paying these accreditation fees. We would also like to note the following – Contents page needs to be updated to reflect the inclusion of the TPI section Annual Registration and re-accreditation - Annual fee, payable at ~~our~~ around one year anniversary of initial accreditation	
Centrica (Energy Supplier)	We note that you have removed reference to the "alternative industry recognised accredited body" and just left it as a RECCo accredited scheme. Please can you confirm that RECCo will be using the Ombudsman (or any Ofgem appointed alternative in due course), as that is the body that supports all accreditation under Ofgem's requirements and licence. If it is not the same body, it will give rise to confusion and potential conflicts around who takes precedence, which would give rise to a lot of uncertainty for brokers, suppliers, and customers. It would also be potentially unfair for a broker to have to incur two lots of accreditation fees, especially the smaller broker outfits. This could be unfair from a financial impact but also a competition aspect, as it could be perceived to support the larger brokerages (who may be better able to absorb duplicative costs) over the smaller brokerages.	Thank you for your comments. The alternative industry recognised accreditation body has been removed only from the R0137A solution, after feedback was received that Parties did not want more than one route to accreditation. It is proposed RECCo will run the REC Services Accreditation Scheme, likely via a Service Provider. This will be separate to the ADR Scheme TPIs are required to register with if they work with micro-businesses.
Jutton Associates Limited (Third Party Intermediary)	n/a	n/a

Business Energy Direct UK (Third Party Intermediary)	n/a	n/a
ENGIE (Energy Supplier)	No comments.	n/a
Utilities Intermediaries Association (Trade Association)	No.	Thank you for your comments.
Anonymous (Third Party Intermediary)	REC Schedule Fees – where I understand this would cost, organisations have already paid for ADR schemes, operational processes, software's, CRM's, compliance staff, and training, to monitor compliance. The purpose of the ADR scheme was to ensure compliance – a fee is paid for this and there are many instances that TPI's have had no requirement to escalate complaints to the ADR. Therefore, adding additional fees when the requirement is not there appears redundant. Comments within the legal text appear contradictory in certain areas, suggested unfinished and undecided scheme regulation – this does not seem like a realistic implementation for either scheme in the immediate future, without flaws, in comparison to the ADR schemes, that handle complaints based on the consumer's requirements and preferences. The TPI Code of Practice is clear and has been implemented by TPI's I have dealt with, despite not being a legal requirement. TPI REC Schedule Issues: 5.1 – Suppliers are to check the TPI Accreditation Register. Issues include cost of workforce to manage this, detriment to TPI's in placing contracts and thus detriment to consumers who can often look to have	Thank you for your comments. REC have used the same meaning of reasonable endeavours as set out in the Ofgem Licence Drafting Principles. A TPI will be identified as being compliant with the TPI CoP once it has been registered with an accreditation scheme and placed on the TPI Accreditation Register by RECCo. This register will be updated daily on the API, and a minimum of weekly on the webpage. The TPI Accreditation Auditor will likely be a separate Service Provider that RECCo tenders for, however the Schedule does allow RECCo to undertake any or all of the TPI Accreditation Auditor in-house if they choose. TPIs would pay for the audit under the REC Services Accreditation Scheme before the audit commences. For example, if they were audited in 2025 and 2030, they would pay for the audit in those years.

	contracts implemented immediately if renewals or acquisition has been left too late. 5.2 – "shall use reasonable endeavours" – what constitutes reasonable endeavours? 6.1 – " A TPI Shall become an Accredited TPI once it has been formally identified as being compliance with the TPI CO" – how will they be formally identified? What is the timescale for this for the REC to confirm this? 6.2 – "remain accredited for a period of 12 months" – collation of required documentation likely needed to renew accreditation creates a further cost element to this proposal. A "self-declaration of compliance" is mentioned – it seems redundant for a fee to be paid to REC when each TPI and industry organisation is declaring their own compliance, anyway. 8.3 and 8.4 – Auditors have 20 days to complete their review whereas the applicant has 10 working days. This seems unevenly balanced, as the TPI typically has customers that are essential to cater to, whereas the REC does. Point being is that organisations that are not support services should be provided the same if not more time. 9.2 TPI Accreditation Auditor – are you going to assign a separate company to do this? This seems redundant where audits would have to be conducted if the consumer was unhappy and had made a complaint. Furthermore, example being our organisation, we have members of staff who audit on a regular basis to ensure compliance. This is already x2 parties that can conduct auditing and compliance activates, for most organisations.	By paper-based desktop audit, it is meant that the audit will not include a site visit. There will be leeway for late audit payments due to human error, as the TPI would be contacted if payment wasn't received before escalation to the PAB. However, payment must be received before the initial accreditation or re-accreditation is granted.

	10.2 Subject to Paragraph 10.3, as a minimum, the TPI Accreditation Auditor shall undertake a TPI Audit of each Accredited TPI every 2-5 years following the date that accreditation is granted under the REC Services Accreditation Scheme. The TPI Accreditation Auditor shall notify the Accredited TPI of the schedule of target TPI Audit dates as soon as practicable following accreditation, and subsequently during the first month of the calendar year in which a TPI Audit is due to take place – **does this mean TPI's would be paying yearly for an audit once every 2-5 years? When can this take place internally or via a ADR if required**? 10.5 In relation to any TPI Audit, the TPI Accreditation Auditor shall audit each Accredited TPI's compliance by means of a paper-based desktop audit to determine whether the Accredited TPI's policies and procedures are compliant with all applicable requirements of the TPI CoP – **Paper based? Or Computer Desktop Audit? Unclear.** 11.4 The REC PAB may also determine that an Accredited TPI is to have its accreditation suspended or withdrawn under the REC Services Accreditation Scheme where the Accredited TPI is bankrupt, insolvent, subject to administration or has not paid fees as required by Paragraph **Error! Reference source not found.- will there be any leeway for human error? For example, banks holding funds, issues with direct debit, details not being updated in time by the REC?**	
Scottish Power Energy Retail (Energy Supplier)	As stated in our response to Question 1, we do not believe that this proposal should be taken forward, in view of the Government's proposed introduction of direct regulation of TPIs. However, we welcome the amendments to the draft legal text for this consultation since the party impact assessment (mainly in R0137A) – in particular,	Thank you for your comments.

	the removal of provisions related to “Industry-Recognised Accreditation Bodies” and the addition of a TPI accreditation number. Connected with our response to the party impact assessment, we have set out a series of proposed amendments to the draft legal text in the table below (for R0137A) to ensure that it is as consistent, clear and effective as possible, should this proposal ultimately be progressed, noting our reservations set out in our response to Question 1. **The Code Manager is unable to paste the table provided by Scottish Power without corrupting the document, but it has been received and reviewed.**	
SEFE (Energy Supplier)	We have a **number of comments** and for ease of reference we have **provided a marked up copy of the TPI Schedule.**	Thank you for your comments. Your comments have not been published in this consolidated document, but the document provided has been forwarded to RECCo for review.

Question 4:	Do you agree with the Code Manager's assessment of the costs and benefits, and the case for change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Citizens Advice (Consumer Body)	Yes, we agree with assessment of the cost and benefits and case for change for this modification proposal.	Thank you for your comments.
Petrius Energy and Water Ltd (Third Party Intermediary)	No, I don't believe the cost predictions are accurate and I don't believe there would actually be any benefit for TPIs in any case, even when ignoring the actual costs and administrative burdens	Thank you for your comments.
Drax Group (Energy Supplier)	**Costs** - Accountability for TPI behaviour should rest with TPIs. Likewise, all costs attached to these arrangements should be borne by TPIs. The proposal to recover development and operational costs from the wider REC budget, means that a proportion of these costs will be met by suppliers and, ultimately, consumers. From a supplier perspective, we don't believe the benefits of the change will outweigh the costs we incur. **Benefits** - Drax already has robust governance processes in place to ensure the TPIs we work with meet the high standards we expect, so we haven't identified any direct benefits to our business. There may be some benefits to the wider industry through the implementation of R0137/ R0137A but there may also be unintended consequences, such as, an increase in alternative TPI business models where the customer pays the TPI directly, without the knowledge/involvement of the energy	Thank you for your comments.

	supplier, and the customer would thus remain unprotected from poor TPI practices and behaviours. **Case for change** - Drax is a long-time advocate of TPI regulation as we recognise there is a significant gap in the protections afforded to non-domestic consumers that use TPIs. However, we don't agree with the case for R0137/ R0137A. While potentially going some way to addressing the issue, we're concerned that implementing this change will be ineffective, creates incentives for TPIs to circumvent the arrangements, and risks derailing the Government's plans for putting in place an effective whole-of-market regulatory framework for TPIs as set out in its open consultation.	
EDF (Energy Supplier)	No comments.	n/a
Anonymous (Third Party Intermediary)	n/a	n/a
Bryt Energy (Energy Supplier)	No comment.	n/a
SSE Energy Supply (Energy Supplier)	We are unable to quantify the costs involved with this change but we feel that with the current DESNZ consultation and this REC assessment, there is an additional cost burden to all interested parties due to their involvement with both documents. There is a significant amount of cross over, which needs to be considered, along with the burden for parties to assess both. Whilst we agree that there needs to be work completed in this area and we still strongly believe that only direct regulation should be implemented, therefore we would appreciate REC holding back on any changes prior to the decision made by DESNZ. Our view would be for DESNZ to implement direct regulation	Thank you for your comments.

	with the REC Schedule complimenting that, such as with the current licencing and codes regime.	
Centrica (Energy Supplier)	We agree with the code manager's assessment that this change will drive an increase in consumer and supplier confidence in TPI's, ensuring a consistent standard across the market, that does not exist today. However, our position remains that we fully support Direct Regulation as a simpler, more transparent route to placing brokers on the same standing as suppliers in protecting customer interests. However, we do not agree with the code managers assessment that this change will minimise the level of data that TPIs will need to provide to suppliers. We as a supplier have set the standard for ourselves through the work, we do to accredit Brokers, driving better outcomes for customers with a robust assurance regime aligned with our frameworks and principles. The proposal by the RECCo to set a minimum viable standard across the industry by accrediting Brokers is welcomed but should not be seen as a solution to or replacement for the broader problem. Indeed, the introduction of the Code of Practice will place an additional burden on TPI's to adhere to a RECCo accreditation in addition to QDSS accreditation as well as suppliers own, frameworks and standards. We have no comments to make on the code manager assessment of the costs described on the charging section of the change report. However, would like to make the comment that the additions to the performance assurance catalogue will drive increased costs to suppliers, through additional MI requirements, which were not present during the impact assessment for this change.	Thank you for your comments. The Code Manager considers the Performance Assurance requirements for Consultation to be less onerous than those provided at Impact Assessment (new data items inside an existing report, rather than the introduction of several new reports). We do not disagree there will be increased costs for Energy Suppliers to provide these, but those costs should be reduced from those predicted at Impact Assessment.

Jutton Associates Limited (Third Party Intermediary)	Costs – possibly are reasonable estimates. It's hard to know. Benefits - are not strongly articulated but are based on an assumption that "something must be done" therefore any change is bound to bring benefits. Case for change – is not strongly articulated. As stated in Q1, the worst behaviours from some intermediaries will diminish now that it is no longer be possible to hide fees. Those organisations attracted by the possibility of exploiting a previous loophole will move into other industries.	Thank you for your comments.
Business Energy Direct UK (Third Party Intermediary)	No. Costs – we now have forecasted costs of between £100 and £500 for accreditation, in addition to this there is also the £25 to £100 for annual registration with an audit being between £500 and £2,000. Energy Ombudsman currently has 1,865 active TPI's, the number of active TPIs across the industry is certainly higher because there are TPIs that don't deal with micro-businesses and currently those TPIs are under no obligation for them to be registered with an ADR scheme, however due to the imminent industry changes, all TPIs dealing with businesses that meet the small business criteria as of 1st December 2024 will need to be registered to an ADR scheme. Looking at the projected figures, the 1st year costs to TPIs would be between £186,500 and £932,500 for accreditation (between £46,625 and £186,500 for future years annual registration) and then between £932,500 and £3,730,000 in future years for audits.	Thank you for your comments. The design/build/test costs and on-going operational costs are only for REC Performance Assurance to audit that Energy Suppliers are adhering to the TPI CoP. These costs were confirmed as part of a REC Service Provider Impact Assessment where further justification and breakdown is provided, which RECCo have visibility of and sign off the costs for. However, these impact assessments are not made public, with only a summary provided by the Code Manager in the Change Report. The REC Services Accreditation Scheme will be entirely funded by the TPIs who register with it, and the assumptions behind those costs have been provided by RECCo.

	All these costs seem excessive when compared to the design costs of £22,400 and then the ongoing operational costs of £91,000 being given by RECCo. No explanation has been provided to justify the forecasted values we are now seeing. Benefits – all benefits listed are purely speculative, no confirmed benefits have been cited. Increased consumer confidence – If a consumer has had a bad experience with a TPI, it is irrelevant whether the TPI was part of a TPI CoP or not, they have still had a bad experience, that consumer may believe that they would have a similar experience with all TPI's and that the CoP is a minimum standard. Our customers would think no differently of BED whether we were part of the TPI CoP or not, our customers are already aware of the high standards we uphold, our ethics and the values we maintain, a TPI CoP would not change that. Increased energy supplier confidence in TPI's – having read the feedback that suppliers have already sent to RECCo, this doesn't seem to be the case. Regardless of whether the TPI CoP is in place or not, suppliers will continue to work with the TPI's they wish to work with (and vice versa) for "sales" activity, which is what is predominantly being covered by the TPI CoP. Minimise Data TPI's have to provide suppliers – we agree that there may be some benefits in the future, however given the current low numberl of requests that we receive from suppliers, it would take up less resources to continue to manage the requests than it would being part of the TPI CoP. Improved Consistency between TPI's – whilst we agree with this statement in principle, all the TPI CoP is doing is setting a minimum	

	standard to follow, many TPI's already go above and beyond the standards proposed.	
ENGIE (Energy Supplier)	We do agree that there are benefits to this change as it could reduce the burden on suppliers having to monitor the accreditation of TPIs and will provide a more level playing field for the regulation of TPIs, potentially increasing customer confidence in the non-domestic market. There is also potential for this change to form part of the regulatory framework for TPIs being put in place by DESNZ.	Thank you for your comments.
Utilities Intermediaries Association (Trade Association)	No, the UIA does not agree with the Code Manager's assessment of the costs and benefits, nor with the overall case for change. The costings presented are overly vague. The comparison to Metering Audit Charges is inadequate, especially given that metering audits are reportedly more complex. Without a clear understanding of what a metering audit entails, this reference provides little assurance. Considering the potential impact on TPIs, RECCo should be seeking detailed cost estimates directly from bodies likely to be appointed as TPI accreditation auditors, rather than making broad comparisons with metering audits. The proposed benefits for TPIs—such as fostering trust in the market and avoiding the need for multiple audits and due diligence checks from various suppliers—appear tenuous. As noted in earlier responses, these benefits lack substantial support and do not justify the significant added costs and burdens imposed on TPIs.	Thank you for your comments.
Anonymous (Third Party Intermediary)	There are no notes on the Cost Manager's assessment of costs that I can see, except that there are likely to be costs to the business.	Thank you for your comments.

	Benefits Responses: INCREASED CONSUMER CONFIDENCE IN TPIS – **TPI's often retain customers for a long-period of time due to the confidence they hold in their TPI, especially with additional support services are given. Furthermore, micro and non-micro consumers have now adapted to having confidence to ADR schemes, if they require it.** INCREASED ENERGY SUPPLIER CONFIDENCE IN TPIS **– having agreements with TPI's covers this, as they are bound by the legal agreement as chosen by the supplier.** MINIMISE THE DATA TPIS HAVE TO PROVIDE TO ENERGY SUPPLIERS – **I have never experienced this issue.** IMPROVED CONSISTENCY BETWEEN TPIS – **the only benefit I can see clearly here is that suppliers/REC can ensure all TPI's are being audited – however, this could simply be wrote into the Code of Practise, as most if not all TPI's follow this in accordance now to ensure compliance.**	The REC TPI CoP is currently voluntary, with around 30 TPIs signed up to it. Industry could not be confident that most or all TPIs follow the CoP based on this number, and could not without it being mandatory.
Scottish Power Energy Retail (Energy Supplier)	In line with our response to Question 1, we believe it is essential that the overall framework for the regulation of TPIs, across legislation, the energy supply licences and industry codes, be taken into account – and, by extension, that this proposal cannot be considered in isolation. Any potential costs or benefits associated with this proposal should be weighed against the overall regulatory framework. Whether or not that approach aligns with traditional change management for this Code, it is necessary where proposals are made to bring new elements of the retail energy market into the Code. We do not agree with Assumption R0137.A001 that the Government's proposed direct regulation of TPIs and this proposal are complementary simply because the Code	Thank you for your comments. The assumption that the Government's proposed direct regulation of TPIs and this proposal are complementary has been made by the Code Manager and so documented within the Change Report. If this assumption is incorrect, the Code Manager expects this to be reflected within the determination made by the Authority.

	Manager has received no request (per the Change Report) from the Government or Ofgem for work on this proposal to be stopped. The proposed TPI direct regulation regime and the REC TPI accreditation regime should be considered against one another based on the design and content of the schemes, not based on the presence or absence of communication between stakeholders. The two schemes share nearly identical principles and would substantially overlap each other. In our view, the TPI direct regulation regime would render the REC TPI accreditation regime duplicative and unnecessary. In turn, any potential benefits from this proposal would need to be re-evaluated to take account of that duplication and its consequences.	
SEFE (Energy Supplier)	We have **no comment on the costs** We **agree** with the Code Managers assessment of the benefits	Thank you for your comments.

Question 5:	Do you agree with the proposed implementation technique? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Citizens Advice (Consumer Body)	No comments.	n/a
Petrius Energy and Water Ltd (Third Party Intermediary)	No.	Thank you for your comments.
Drax Group (Energy Supplier)	The phased approach makes sense, but timescales feel ambitious. The Energy Ombudsman onboarded 1,890 TPIs to its TPI ADR scheme during the first year of operation and identified multiple challenges in the process of doing so. The scope of the REC proposals is far wider than the ADR scheme, and assessing such a significant number of diverse TPIs for accreditation is going to be an extremely time-consuming exercise. Six months between TPI accreditation being available and the obligation on suppliers being binding doesn't seem realistic. We would suggest 12 months is a reasonable timeframe to ensure TPIs are aware, can make the necessary changes and complete the accreditation process.	Thank you for your comments.
EDF (Energy Supplier)	No comments.	n/a
Anonymous (Third Party Intermediary)	n/a	n/a

Bryt Energy (Energy Supplier)	We agree with the technique but thoughtful consideration of the DESNZ TPI consultation should be considered before this change progresses any further, particularly in light of the preferred option of a general authorisation regime which somewhat goes against the prescriptive qualification in this change.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Should either change be taken forward, do REC have the capacity to ensure all TPI's are accredited at the point of implementation? Our view is that there should be a staggered implementation which will allow REC to accredit TPI's ahead of suppliers being able to work with them. We are not confident that REC can accredit all TPI's within this timescale due to our own internal audit regime, e.g. some TPI's take up to 6 weeks to audit, dependant on the level of audit being completed.	Thank you for your comments. RECCo plan to publicise a date by which if a TPI has requested to be registered under the REC Services Accreditation Scheme, they will be processed in time for the date when Energy Suppliers can only be used accredited TPIs. This is to encourage TPIs to register early and not end up with a last-minute influx of registration requests.
Centrica (Energy Supplier)	We are supportive of the approach for implementation being a 'big bang', as this will ensure an immediate consistency of standards across all TPIs within the market at the same time, removing risk of varying standards of service to customers. However, we urge RECCo to ensure that TPIs are given sufficient notice of this change to allow time to prepare for accreditation. There also needs to be an understanding of where TPIs will need to display accreditation for both consumers and stakeholders' benefit.	Thank you for your comments.
Jutton Associates Limited (Third Party Intermediary)	See question 7.	Thank you for your comments.
Business Energy Direct UK (Third Party Intermediary)	n/a	n/a

ENGIE (Energy Supplier)	Yes, we agree with the two-phase approach, TPIs to get accredited first and then process to go live with Suppliers.	Thank you for your comments.
Utilities Intermediaries Association (Trade Association)	No.	Thank you for your comments.
Anonymous (Third Party Intermediary)	No – I think a phased approach would be more product, if this is elected to go forward. The “Big Bang” approach could lead to chaos for consumers, leaving them with no clear route to supplier compliance, or TPI compliance. Furthermore, the costs to businesses can be detrimental – considering this so late on and in such a rapid timescale has provided no courtesy to businesses who need to consider the operational changes that will be required, team structure changes, training requirements and cashflow forecasting. Mistakes could cause detriment to a strategy that is not fully developed, thus leading to the collapse of the scheme. This also allows very limited time to test the scheme on any TPI’s or suppliers, which would enable clear results.	Thank you for your comments. This Change Proposal has a Big Bang implementation approach in that all the legal text goes live at once, there is not anything further for another REC release. However, inside the legal text confirms a phased approach where TPIs can begin to become accredited six months before it is binding for Energy Suppliers to only use an accredited TPI.
Scottish Power Energy Retail (Energy Supplier)	We have no comments to make on the implementation technique for this proposal at this stage.	n/a
SEFE (Energy Supplier)	We **agree** with the proposed Big Bang implementation technique	Thank you for your comments.

Question 6:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to determination by the Authority following approval by the Change Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Citizens Advice (Consumer Body)	Yes, we agree that this Change Proposal should be authority determined following approval by the Change Panel. While we are supportive of the proposed accreditation scheme, we are concerned that there may be overlap with the authorisation scheme proposed in the DESNZ consultation on regulating TPIs in the energy retail market. We believe that an authority determined decision would ensure sufficient consideration of how these proposals would work together over the short and long term.	Thank you for your comments.
Petrius Energy and Water Ltd (Third Party Intermediary)	No.	Thank you for your comments.
Drax Group (Energy Supplier)	Yes. Given the significant impacts of this change proposal, and its interplay with the Government's consultation on regulating the wider TPI market, determination by the Authority is essential.	Thank you for your comments.
EDF (Energy Supplier)	No comments.	n/a
Anonymous (Third Party Intermediary)	n/a	n/a
Bryt Energy (Energy Supplier)	No comment.	n/a

SSE Energy Supply (Energy Supplier)	Yes.	Thank you for your comments.
Centrica (Energy Supplier)	We agree that this change should be subject to approval from Ofgem.	Thank you for your comments.
Jutton Associates Limited (Third Party Intermediary)	See question 7.	Thank you for your comments.
Business Energy Direct UK (Third Party Intermediary)	n/a	n/a
ENGIE (Energy Supplier)	Yes.	Thank you for your comments.
Utilities Intermediaries Association (Trade Association)	No.	Thank you for your comments.
Anonymous (Third Party Intermediary)	Cannot find where this is – this should be linked. All resources should be clear and linked if such a mass industry change is to occur, as confusing TPI's and suppliers is only going to confuse consumers and have a knock-on effect.	Thank you for your comments. The Code Manager's assessment on this being an Authority Determined Change Proposal is confirmed inside the Change Report provided for Consultation.
Scottish Power Energy Retail (Energy Supplier)	We agree that this proposal should be decided by the Authority, should it be taken forward.	Thank you for your comments.
SEFE (Energy Supplier)	We agree that this matter should be subject to Authority Direction	Thank you for your comments.

Question 7:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation 07 March 2025 (or the next available implementation date after Authority determination is received)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Citizens Advice (Consumer Body)	Yes, we agree with this implementation date.	Thank you for your comments.
Petrius Energy and Water Ltd (Third Party Intermediary)	No, that is not enough time to properly consider the implications and certainly shouldn't be before the DESNZ consultation. I would also be surprised if many TPI's were even aware of these proposals. They could have a huge impact on them, so consulting them and gather their responses seems imperative. It is concerning that there is not even a TPI option in the Organisation category drop down when filling in this response.	Thank you for your comments. It will be within Ofgem's gift to determine the appropriate time to make a decision on this Change Proposal, and this may be after the DESNZ consultation outcomes have been published. The Code Manager and RECCo have engaged with as many TPIs as possible through the impact assessment and consultation process, but appreciate there are a huge number of TPIs in the market we will not have reached. We expect that if this Change Proposal is approved, Energy Suppliers will help with this engagement as they will need the TPIs they work with to become accredited to continue working with them.

		The Code Manager will take an action to add Third Party Intermediary to the drop down in Impact Assessment and Consultation response forms.
Drax Group (Energy Supplier)	We don't disagree with the proposed implementation date but, as stated in our response to question 5, the broader implementation timescales don't seem realistic.	Thank you for your comments.
EDF (Energy Supplier)	No. As we have set out in our answer to Question 2, R0137 and R0137A are redundant given the 20 September publication by DESNZ of the Regulating TPIs consultation, and the proposals made therein. We do not support continuing with either proposed change in terms of development or preparations for implementation. We do not support the implementation of either change as an interim measure prior to the commencement of any actions set out by the Government. REC must not set down an implementation date prior to the publication of the Government response to the consultation. We urge pragmatism on the part of REC and Ofgem to prevent wasted effort, cost, and the unnecessary deployment of supplier and TPI resources by proceeding with a redundant implementation process.	Thank you for your comments.
Anonymous (Third Party Intermediary)	It is important TPIs of all sizes and varied sophistication are given time to prepare for the accreditation process – including costs. We believe (as a minimum) a full financial year should be given between starting to implement accreditation and finalising the position that suppliers must only work with accredited TPIs. This is to allow sufficient time for TPIs of all sizes to put themselves in the best position to meet accreditation,	Thank you for your comments. It will be within Ofgem's gift to determine the appropriate time to make a decision on this Change Proposal, and this may be after the

	as well as allowing them the opportunity to budget for the associated costs. Also, given the ongoing consultation with DESNZ, we would recommend RECCo await the outcome of that consultation before proceeding with mandating accreditation for TPIs to ensure there is alignment between the two. The RECCo TPI Code of Practice and DESNZ potential regulation cannot continue in silos and a joined up approach should be taken from the outset. Any regulatory requirements placed upon TPIs by DESNZ can be easily folded into the RECCo TPI Code of Practice and Accreditation (or vice versa) at this stage and whilst they are not yet live.	DESNZ consultation outcomes have been published.
Bryt Energy (Energy Supplier)	DESNZ should be consulted on the date of this change to ensure there is no detrimental impact / duplication or unnecessary additional effort/burden on both suppliers and TPIs to both be able to respond to multiple consultations and regulatory changes at the same time. Additionally, if the proposed general authorisation regime is put in place by DESNZ and monitored by Ofgem does it make sense for the accreditation scheme to sit with REC? Should the accreditation scheme be incorporated into the general or specific authorisation regime for example.	Thank you for your comments. If DESNZ choose to implement regulation, the Code Manager cannot comment on which Code that may sit with (if any) at this time.
SSE Energy Supply (Energy Supplier)	Please refer to our answer to Q5, we have concerns regarding REC's capacity to complete the required accreditation checks for around 2000 TPI's ahead of the proposed implementation and that work will not start until Authority approval has been received, therefore creating a shorter window of accreditation than what we see now.	Thank you for your comments.

	Any changes to systems, will require at least 6 month lead time, this includes amendment to current reporting requirements.	
Centrica (Energy Supplier)	Given that this change proposal is only planned to be sent for Authority approval on the 18th of December, we feel that this does not give both suppliers and TPIs sufficient time to prepare for this change. Consideration needs to be given to allowing TPI's a sufficient period to prepare and understand the accreditation process and procedure, with clarity to be provided on how long this process would take across the non-domestic market. In addition, there is a lack of clarity in understanding how long it will take REC to provide a list of accredited brokers to suppliers, allowing them to be offboarded. Further detail is also needed for any differing process between aggregators and sub-brokers, if any. It is our suggestion that REC follow a similar approach to what was taken in Ofgem's Non-Domestic Market Wide Review, with the expanded requirement for suppliers to only work with TPIs who are a member of a QDSS. In this instance, a period of 9 months was given to prepare for the change.	Thank you for your comments. Sub-brokers are not included separately as part of this Change. If they are the party the Energy Supplier signs the contract with, they will need to be accredited. If they are an agent acting on behalf of an accredited TPI, that TPI will be responsible for ensuring all its agents adhere to the principles of the REC TPI CoP. RECCo will endeavour to publish the list of accredited TPIs as soon after TPIs can start becoming accredited as possible, and regularly maintain this through to when Suppliers can only use accredited TPIs.
Jutton Associates Limited (Third Party Intermediary)	No –the timescales are too short and it's entirely possible that the review being conducted by DESNZ will mean any more resource being devoted to this work is wasted. Without knowing the outcome of DESNZ's review, you should pause any implementation.	Thank you for your comments. It will be within Ofgem's gift to determine the appropriate time to make a decision on this Change Proposal, and this may be after the DESNZ consultation outcomes have been published.

Business Energy Direct UK (Third Party Intermediary)	NO- I don't think it should be recommended for approval for 7th March 2025. It is not clear how the RECCo TPI CoP sits long term with the consultation that has been put forward by DESNZ around regulating TPI's, or how these align. Until this is confirmed, we believe the TPI CoP via RECCo should be put on hold ,if the decision is then made that DESNZ aren't going to implement anything to regulate TPIs, then a version of the TPI CoP that industry agrees with, could then be approved. We believe RECCo need to consider the following- • We have no evidence to suggest that the TPI CoP would deliver improvements for non-domestic consumers (and if it did, it would only specifically impact non domestic TPI's ,however DESNZ is looking at a wider piece covering all types of TPI's in the market) • Fee transparency has already been delivered for micro business consumers and has now been extended to small business customers, this wasn't the case when the TPI CoP was initially being considered • The ADR scheme is being extended to ensure protection not just to micro business customers, but to all small business customers, providing redress where a customer has suffered detriment because of TPI behaviour. Again this wasn't the case when TPI CoP was first considered. • TPI's could be hit with a double cost burden, the cost to register under RECCo TPI CoP and the potential first audits, and DEDNZ may then role something out that would again have a cost associated with it.	Thank you for your comments. It will be within Ofgem's gift to determine the appropriate time to make a decision on this Change Proposal, and this may be after the DESNZ consultation outcomes have been published.

	Finally, whilst anecdotal feedback has been provided about the detriment caused by TPI's, the figures reported don't currently highlight TPI behaviour as a widespread issue. Citizens Advice confirm in their previous response to RECCo that just 4% of the Microbusiness complaints they received in the past year are related to TPIs, and in the first year of the ADR scheme ran by the energy ombudsman, only 741 complaints were raised against TPIs.	
ENGIE (Energy Supplier)	Yes.	Thank you for your comments.
Utilities Intermediaries Association (Trade Association)	No, we do not agree with the proposed implementation date of 07 March 2025. The timeline is too short, and proceeding before the DESNZ consultation is completed risks wasting resources. The outcome of DESNZ's consultation may introduce new regulatory requirements or guidance, and it would be prudent to pause implementation until these outcomes are known.	Thank you for your comments. It will be within Ofgem's gift to determine the appropriate time to make a decision on this Change Proposal, and this may be after the DESNZ consultation outcomes have been published.
Anonymous (Third Party Intermediary)	Strongly disagree, this is far too short notice for the following reasons: **- Time for Operational Adjustments will be required.** **- Staff Training and reallocation of resources, if compliance teams are ample and prominent.** **- Potential system and IT Modifications.** **- Contractual Adjustments and Client Communication.** **- Financial and Resource Constraints.** **- Need for Guidance and Clarification – full guidance and explanations as listed above should be provided.**	Thank you for your comments.

Scottish Power Energy Retail (Energy Supplier)	As stated in our response to Question 1, we do not believe that this proposal should be taken forward, in view of the Government's proposed introduction of direct regulation of TPIs. However, we believe that, should it be taken forward, it should only be implemented after the Government has published its response to its TPI direct regulation consultation. Within the proposal itself, to make the necessary system and process changes, we believe that parties (suppliers and TPIs) should have a minimum of 6 months of implementation time from a positive decision by the Authority on a TPI accreditation scheme to the opening of TPI accreditation applications. For the same reason, we believe that parties should have a minimum of 12 months of implementation time from a positive decision by the Authority on a TPI accreditation scheme to the entry into force of the obligation on suppliers to work only with TPIs which are accredited under the proposed Schedule. These timelines take due account of the time and work required to deliver the requisite system and process changes, as well as the time implications of potentially several thousand TPIs seeking to register (noting that Ofgem quotes an estimate of 2,500 TPIs in its Non-Domestic Market Review Decision of 5 April 2024).	Thank you for your comments.
SEFE (Energy Supplier)	We would prefer to see the **implementation as soon as reasonably practicable**. Noting the recent delays in the MWHH program we would just seek assurance that this has been taken into account when considering the optimum implementation date.	Thank you for your comments.

Question 8:	Do you agree with the Code Manager's recommendation, that R0137A should be recommended for approval by Change Panel and R0137 recommended for rejection? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Citizens Advice (Consumer Body)	Yes, we agree with the Code Manager's recommendation to approve R0137A and reject R0137.	Thank you for your comments.
Petrius Energy and Water Ltd (Third Party Intermediary)	Neither. Direct regulation is the only way to properly address the concerns.	Thank you for your comments.
Drax Group (Energy Supplier)	No. In our view, both R0137 and R0137A should be recommended for rejection by the Change Panel. It is an inefficient use of the Code Manager's resources to proceed with these proposals when the Government is currently consulting on direct regulation of the wider TPI market. The narrow scope of R0137/ R0137A risks leaving part of the market (both domestic consumers and TPIs paid directly by non-domestic consumers) unregulated while the remaining part is subject to proxy-regulation via suppliers. Government's current consultation states that, to avoid a complex landscape with overlapping rules, any new regulatory option they introduce would be expected to replace current rules set out by Codes of Practice. The further the REC arrangements are taken, the greater the task of unwinding them if the Government's proposals go ahead and the more sunk cost will be incurred and wasted.	Thank you for your comments.

EDF (Energy Supplier)	The alternative change proposal R0137A better reflects our feedback to the Impact Assessment. However, as we have set out above, we do not support continuing with either proposed change in terms of development or preparations for implementation. We do not support the implementation of either change as an interim measure prior to the commencement of any actions set out by the Government. We urge pragmatism on the part of REC and Ofgem to prevent wasted effort, cost, and the unnecessary deployment of supplier and TPI resources by proceeding with a redundant implementation process.	Thank you for your comments.
Anonymous (Third Party Intermediary)	We agree with this recommendation, as referenced above in response to question 2.	Thank you for your comments.
Bryt Energy (Energy Supplier)	Agreed as per Q1.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We are happy for R0137 to be rejected and R0137A to be approved. But as mentioned previously this needs to be developed in conjunction with the DESNZ direct regulation.	Thank you for your comments.
Centrica (Energy Supplier)	On balance, between the two solutions, we are supportive of R0137A being recommended for approval over R0137, on account of the streamlined accreditation process removing the risk of varying standards across the non-domestic market. We strongly advocate for direct regulation in this market, as the effective and enduring way to ensure customers are treated fairly	Thank you for your comments.

	across all their interactions with Brokers and would not want the implementation of this code to delay or stop a focus on direct regulation, as any delay would result in inadequate protection of customer interests. In this sense, we also urge RECCo to ensure alignment with any outcome from the ongoing consultation from DESNZ. Finally, we also strongly oppose the performance assurance requirements and maintain our previous position that this is not in line with the level of detail we provide to the RECCo, and we would consider onerous for this change. Data protection considerations are also required when more customer data is being requested than RECCo currently receives.	
Jutton Associates Limited (Third Party Intermediary)	Yes – see question 1.	Thank you for your comments.
Business Energy Direct UK (Third Party Intermediary)	As explained previously, we consider R0137A to be more appropriate than R0137.	Thank you for your comments.
ENGIE (Energy Supplier)	Yes.	Thank you for your comments.
Utilities Intermediaries Association (Trade Association)	No, the UIA is fundamentally opposed to both modifications, R0137A and R0137, as detailed in our responses to Questions 1, 2, 4 and 7. These proposals represent a distraction from what is genuinely required and widely supported across the industry: direct regulation. This approach, currently under consultation by DESNZ, would ensure that any regulatory changes are backed by the necessary legal authority—something RECCo lacks. The proposed modifications introduce unnecessary burdens, impose vague and potentially excessive costs, and fail to address key conflicts	Thank you for your comments.

	of interest and operational challenges for TPIs. Given these factors, we cannot support the recommendation to approve R0137A or reject R0137.	
Anonymous (Third Party Intermediary)	I believe that neither of the proposed schemes should be approved, as we already have established Alternative Dispute Resolution (ADR) schemes that effectively address consumer and market concerns. Additionally, the RECCO Code of Practice is highly regarded across the industry and has been widely implemented by numerous TPIs I have worked with. The RECCO Code provides a comprehensive and trusted framework that ensures fairness, transparency, and compliance, setting a high standard for TPI conduct. Introducing new schemes would create redundancy and could undermine the cohesion already established through these respected mechanisms. The existing ADR frameworks, combined with the robust standards in the RECCO Code, are sufficient to maintain high industry standards without adding unnecessary complexity or confusion for TPIs and their clients.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	While we appreciate the spirit of this proposal, and the work dedicated to it, we do not believe that this proposal should be taken forward – whether as R0137 or R0137A – for the reasons that we have set out in our responses to Question 1 and 4. In our view, the Government's proposal of introducing direct regulation of TPIs renders a REC TPI accreditation regime unnecessary. We hold that view for both a "general authorisation" regime and a "specific authorisation" regime, noting that we support a specific authorisation regime for energy brokers and that, under that approach, every energy broker seeking to operate in the market would need to be registered with the regulator (as proposed, Ofgem). Any merits to this proposal in isolation must be seen in the	Thank you for your comments.

	wider context. The REC TPI accreditation regime under this proposal and the Government's proposal TPI direct regulation regime share nearly identical principles and would substantially overlap each other. Between the two, we support direct regulation of TPIs as the best way to ensure that all TPIs adhere to an established set of standards and are held accountable for their actions by a regulator, where warranted. In that light, we believe that both R0137 and R0137A should be withdrawn and, if not withdrawn, should be rejected.	
SEFE (Energy Supplier)	We **support both proposals** but **we agree with the code managers recommendation that R0137**A should be recommended for approval subject to their being no material competition concerns with this approach.	Thank you for your comments.

Question 9:	Do you have any other comments relating to these Change Proposals?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Citizens Advice (Consumer Body)	No comments.	n/a
Petrius Energy and Water Ltd (Third Party Intermediary)	No.	n/a
Drax Group (Energy Supplier)	The Background section of the change report is unclear and gives a misleading impression of existing protections and licence conditions, along with the risks/ issues this change is seeking to address. It states that Non-domestic Consumers (which we assume refers to larger non-domestic consumers) have more limited protections than Domestic and Microbusiness Consumers. This is true in respect of their interactions with energy suppliers, who have additional targeted obligations to fulfil in their dealings with microbusinesses, but it is a misleading statement in the context of TPI interactions. While microbusinesses have access to redress schemes to resolve complaints with TPIs, they have no additional or greater protections than any other non-domestic consumer interacting with TPIs. Furthermore, the summary states "for Micro-Business Consumers, the standard licence conditions obligate Energy Suppliers to ensure TPIs they work with are adhering to certain principles" – this statement misrepresents the conditions in the supply licence and so gives a misleading impression of suppliers' current obligations and,	Thank you for your comments.

	consequently, the impact the proposed solution might have. The summary goes on to say that the change "seeks to expand the obligation for Energy Suppliers to only work with TPIs who are adhering to the principles set out in the REC CoP to all Non-Domestic Consumers". As Suppliers are not currently under any obligation to only work with TPIs adhering to the principles set out in the CoP, it is unclear what the change is seeking to expand on.	
EDF (Energy Supplier)	No additional comments.	n/a
Anonymous (Third Party Intermediary)	We would request for the RECCo TPI Code of Practice document is subject to version control to ensure it is expressly clear which is the current version and when it was amended. An additional summary table on the document to demonstrate the changes made to the Code of Practice would also be useful. Within the Change Report, it provides estimate costings for the various key accreditation milestones. Whilst we appreciate the Charging Statement is a category 3 document and therefore consultation on this document is not mandatory, we would strongly recommend the charges associated with TPI accreditation are consulted on to ensure they are a fair and proportionate reflection of the work being undertaken. It is accepted that TPI accreditation will result in some TPIs exiting the market; it is important careful consideration is given to costs to ensure smaller and equally valuable TPIs do not exit the market unnecessarily.	Thank you for your comments. All REC documents are subject to version control and the latest version will be on the REC Portal. If R0137 or R0137A is implemented, the TPI CoP becomes a Category 1 document so will also always be subject to the change process with at minimum one consultation before changes are made. The comments on a consultation for the Charging Statement have been fed back to RECCo.
Bryt Energy (Energy Supplier)	Our overriding comment is that before proceeding any further with this change the results of the DESNZ consultation should be considered. Based on the responses that DESNZ receive REC should work in collaboration with DESNZ to ensure the timelines and benefits of this	Thank you for your comments. It will be within Ofgem's gift to determine the appropriate time to make a decision on this

	change are still relevant and/or incorporated into any changes to regulation that they propose. We fully support greater transparency within the TPI market so do not object in principle to this or potential changes from DESNZ but do feel that these should be aligned / worked on in collaboration.	Change Proposal, and this may be after the DESNZ consultation outcomes have been published.
SSE Energy Supply (Energy Supplier)	As mentioned previously our preference is the licensing of TPI's. If this is not the outcome of the DESNZ consultation, we would be happy for the proposal R0137A to be used alongside DESNZ's preferred - General authorisation regime.	Thank you for your comments.
Centrica (Energy Supplier)	We believe further consideration/clarity should be given to the following scenarios: • Where a contract exists between the Energy Broker and end customer, what impact this has on the non-domestic customer should an Energy Broker be off boarded. • Current SLC (20.5) requires suppliers to ensure TPI's are members of a QDSS scheme to work with them, along with requirement for suppliers to comply with the REC (11B.1) consideration should be given how these interact. • RECCo need to ensure that the timing of their proposal is consistent with wider work being undertaken by Government. Noting the cost to industry of implementing a change of this nature. • This code should not place further burden on suppliers to provide onerous reporting, other than confirmation of compliance to work with accredited TPIs.	Thank you for your comments.

	• The level of data requested for items in the performance assurance catalogue, is not in line with the level of detail we provide to the RECCo, and we would consider onerous for this change. Data protection considerations are also required when more customer data is being requested than RECCo currently receives.	
Jutton Associates Limited (Third Party Intermediary)	See question 1.	Thank you for your comments.
Business Energy Direct UK (Third Party Intermediary)	I believe that prior to progressing, we need to understand whether the issues previously identified still exist following the changes imposed by Ofgem, specifically considering ADR for TPI's and fee disclosure We also have concerns that the TPI ADR and TPI CoP, if it is progressed, offers no protection against someone creating a company, following which it causes detriment to consumers, and then simply closing that company prior to any audit being carried out. If we look at the Energy Ombudsman scheme, we can see a large number of "subscribers" that are no longer active, this raises concern about the TPI CoP and its inability to prevent a TPI from registering, taking the upfront commission payments offered by suppliers and then exiting the market. • 2,323 TPI's have registered with Energy Ombudsman scheme. • 462 of those are now inactive. • 62 companies were registered with the scheme for 12 months or less and 1/3 of these organisations applied for membership within 90 days of registering the company. We also don't have any published statistics on complaints so far, so how many complaints have been raised and against how many TPI's?	Thank you for your comments. The introduction of an annual reaccreditation requirement has been introduced into the REC Services Accreditation Scheme. While this will be lighter touch than the original sign up and a full audit, it should provide some assurance that the TPIs who re-register with the Scheme continue to be compliant with the TPI CoP. RECCo may explore in the future asking for complaints information from ADR Schemes or the Energy Ombudsman to feed into the risk based audit methodology, but this won't be published publicly. The Code Manager recommends Parties approach the Energy Ombudsman directly if they believe complaints data should be publicly available to see how this may be progressed.

	How many complaints raised couldn't be progressed as the TPI was no longer part of the Energy Ombudsman TPI scheme etc. From past experience and my knowledge of the industry, I would expect that you have the same repeat offenders that account for the majority of complaints. It is noted that Citizens advice commented only 4% of Microbusiness energy complaints they received in the past year relate to TPIs. We would like to see RECCo obtain detailed complaints data from Energy Ombudsman and for this to be shared with all stakeholders.	
ENGIE (Energy Supplier)	We would stress the importance of a joined-up approach between REC and DESNZ to prevent duplication of effort or unnecessary re-work as the regulatory framework is developed alongside this change proposal.	Thank you for your comments.
Utilities Intermediaries Association (Trade Association)	No.	n/a
Anonymous (Third Party Intermediary)	n/a	n/a
Scottish Power Energy Retail (Energy Supplier)	We have no further comments to make on this proposal at this stage.	n/a
SEFE (Energy Supplier)	We have provided **detailed comments on the schedule separately**	Thank you for your comments.