RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	**Final Recommendation**

CHANGE REPORT

R0155 – CHANGE OF OCCUPIER: EVIDENTIARY STANDARDS AND TIMESCALES

DOCUMENT VERSION	V2.1
PROPOSED IMPLEMENTATION DATE	27/06/2025
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	CHANGE PANEL	**CHANGE PATH**	AUTHORITY DETERMINED
PRIORITY STATUS	MEDIUM	**URGENCY**	STANDARD
IMPACTED STAKEHOLDERS	ENERGY SUPPLIERS, THIRD PARTY INTERMEDIARIES (TPIs)		

LEAD ANALYST (SOLUTION LEAD)	ASSURANCE LEAD	TECHNICAL LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

This Change Proposal seeks to address industry concerns with the Non-Domestic Change of Occupier (CoO) process identified by Non-Domestic Suppliers, Third Party Intermediaries (TPIs) and Consumers to bring improvements to the CoO process.

After the closure of the Party impact assessment on 27 September 2024, this Change Proposal was formally renamed from ‘Change of Tenancy: Evidentiary Standards and Timescales’ to ‘Change of Occupier: Evidentiary Standards and Timescales’ to accurately reflect the appropriate legal terminology.

RESPONSIBLE COMMITTEE DECISION

On 17 December 2024, in line with the Code Manager Recommendation, the REC Change Panel voted to recommend that the Authority:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 27 June 2025.

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BACKGROUND

1 SUMMARY

This Change Proposal seeks to address industry concerns with the Non-Domestic Change of Occupier (CoO) process identified by Non-Domestic Suppliers, Third Party Intermediaries (TPIs) and Consumers to bring improvements to the CoO process. Such issues have been strongly acknowledged previously but are still being witnessed in the industry.

Previous research, and work, has taken place to explore the issues that all Parties involved in the CoO process have experienced. For example, Ofgem's (Non-domestic market review: Findings and Policy consultation | Ofgem) findings paper sets out a number of issues they identified as part of the CoO process, both where the Consumer seeks to stay with the incumbent supplier and where they seek to move to another Energy Supplier. These were further highlighted in "Non-domestic market review: Statutory consultation on licence changes" published 07 December 2023, together with the expectation that these issues would be addressed through the REC.

RECCo also undertook some work to identify potential solutions which were presented at a preliminary workshop in October 2023. The material from which is available on the RECCo Website: Webinar round-up: New Change of Tenancy rules proposed for the non-domestic energy market - Retail Energy Code Company. However, these potential solutions were not taken forward. Instead, this REC Change Proposal was raised, without a solution, to explore the existing issues highlighted by Ofgem and RECCo, amongst other Market Participants. It would allow the REC, with the engagement of REC Parties, to develop a solution on CoO evidentiary standards and timescales. The Code Manager facilitated a R0155 Change of Occupier workgroup to allow members from across the industry to contribute their experiences and suggestions. The outcomes from this workgroup have been developed into a proposed solution introducing a list of evidentiary documents, and Service Level agreements (SLAs) for Energy Suppliers to follow the CoO process.

Further details on the outcomes of the R0155 solution development workgroup, and the proposed solution, are detailed throughout this Change Report.

2 PROBLEM STATEMENT

Non-Domestic Consumers may struggle to quickly and easily update a supplier when they become the new owner/occupier or responsible bill payer for a property. This can include:

- Inconsistent requests from suppliers for proof they are the new owner/occupier or responsible bill payer.
- Inconsistent time taken to have new billing account set up or new contract agreed with the Energy Supplier.
- Inconsistent treatment of request to change Energy Supplier (CoO flagged or not flagged, loss request objected to or not objected to).

- Risk of being held responsible for previous owner/occupier or responsible bill payer's debt and contract.
- Risk of being put on deemed prices (on assumption these are more expensive than contract terms).

Energy Suppliers may struggle to quickly and easily update their billing and contractual records for non-domestic properties. This can include:

- Inconsistent updates from Consumers leaving a property.
- Inconsistent updates from Consumers taking over a property.
- Inconsistent quality of evidence provided.
- Risk of invalid/fraudulent requests to avoid debt or leave contracts before the expiry date.

Third Party Intermediaries (TPIs) may struggle to provide Non-Domestic Consumers and Energy Suppliers with a service. This can include:

- Different processes for each Energy Supplier.
- Different evidence available from each Consumer.
- Being stuck in the middle.

3 IMPACTS

CONSUMERS
Microbusiness
Small and Medium Enterprise
Industrial & Commercial (I&C)

REC SERVICE PROVIDERS
Secure Data Exchange Service (SDEP)
Central Switching Services
Central Data Provider Services Provider

RECCO / REC CODE MANAGER
RECCo
REC Code Manager – Performance Assurance
REC Code Manager – Technical Services

REC PARTIES AND SERVICE USERS
Energy Suppliers
Third Party Intermediaries

REC DOCUMENTS / PRODUCTS	
Schedule 1 – Interpretations and Definitions	Schedule 30 – Consumer Facing Switching and Billing Issues
Schedule 23 – Registration Services	Performance Assurance Report Catalogue (PARC)
Schedule 24 – Switching Data Management	TPI Code of Practice

3.1 MARKET WIDE HALF-HOURLY SETTLEMENT

MHHS DESIGN	MHHS DATA SPECIFICATION	MHHS CODE DRAFTING
No impact on MHHS Design.	No Data Specification.	Indirect impact – amendments to Schedule 1 (Interpretations and Definitions) and Schedule 23 (Registration Services).

4 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**19-Dec-23**	**18 Oct-24**
	Solution Development	**Completed**	**Completed**
	Legal Review	**Completed**	**Completed**
	Impact Assessment	**Completed**	**Completed**
	Solution Refinement	**Completed**	**Completed**
	Update to Responsible Committee	**Completed**	**Completed**
Change Proposal		**18-Oct-24**	**16-Dec-24**
	Business Case Assessment	**Completed**	**Completed**
	Update to Responsible Committee	**Completed**	**Completed**
	Consultation	**Completed**	**Completed**
	Final Determination	**Completed**	**Completed**
	Change Report Published for Comments	**Completed**	**Completed**
Voting		**17-Dec-24**	**17-Dec-24**
	Responsible Committee Vote	**Completed**	**Completed**
	Issued for Authority Determination	18 December	18 December

5 STAKEHOLDER ENGAGEMENT

The Code Manager has provided continuous stakeholder engagement throughout the Change Process, particularly with Energy Suppliers, Third Party Intermediaries, Ofgem, Citizens Advice and the Energy Ombudsman. The Code Manager has worked to ensure all Parties who are impacted by this Change Proposal have had to opportunity to engage, including numerous Parties who have engaged with the REC Change Process for the first time. The Code Manager will continue to offer stakeholder engagement and assistance as part of Parties preparation for the implementation of this Change Proposal.

During solution development, there was the opportunity for stakeholder engagement through a solution development working group including a variety of stakeholders. Further details on this engagement can be found in Section 7 of this Change Report.

On the completion of the solution development, the Code Manager issued an extended Party impact assessment to allow stakeholders to provide feedback on the proposed solution, including the initial drafted legal text. A summary of this engagement and the responses can be found in Section 10 of this Change Report.

The Code Manager reviewed the impact assessment responses and amended the solution. This was published for a standard industry consultation. In addition, the Code Manager published an additional guidance document (as requested during the R0155 working group) to assist stakeholders with the remainder of the Change Process and moving towards a potential implementation of R0155. A summary of this engagement and the consultation responses can be found in Section 13 of this Change Report.

The Code Manager has provided comments to all responses received as part of the Party impact assessment and the industry consultation. A document containing the consolidated non-confidential responses, and Code Manager comments, can be found on the REC Portal for each of the impact assessment and the consultation. The Code Manager, however, notes that a high number of confidential responses were received. Consequently, the Code Manager has not been able to publish the comments for these responses. If your Party submitted a confidential response to either the impact assessment and/or consultation and would like to be sent the Code Manager comments for your individual responses, please contact either your Operational Account Manager (OAM) or the Lead Analyst for this Change Proposal.

6 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	2	25	50
	Retail Markets Impact	Retail Risk(s)	2	15	30
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	5	5
		Legal and Regulatory Compliance	2	13	25
Resource	Complexity / Effort / Duration		1	8	8
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		2	15	15
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity (High Priority activity)	0	20	0
				Overall Priority Score (rounded)	133

Priority Status	MEDIUM
Change Proposal Type	STANDARD

The priority status for this Change Proposal is medium based on a weighted prioritisation score of 133 and has been assessed as a Standard Change.

7 SUMMARY OF ANALYSIS UNDERTAKEN

The Code Manager arranged a solution development workgroup to allow different Market Participants, including Energy Suppliers, TPIs and Consumer representative groups, to contribute their views and experiences on the CoO process, and their suggestions for a defined solution.

Following a nomination process, including I&C Shippers and Suppliers (ICoSS) and Energy UK, and pre-workgroup webinars to explain the Change Proposal, and the Change Proposal process, the first session of the workgroup took place on 29 February 2024. There were seven meetings of the workgroup where the subsequent activities and analysis took place either during, or between, the sessions:

- The problem statement was reviewed and broken down separately for Non-Domestic Consumers, Energy Suppliers and TPIs.
- The Code Manager engaged with legal resources to further understand the solution requirements, viability, and to deem what is in scope of R0155.
- A reassessment of the issues with the CoO process, including from a Consumer perspective, and a review of the list of possible evidentiary documents.
- An assessment of the issues within the Switch process.
- Consideration of whether a list of evidentiary items should be provided as a guidance document or incorporated into legal text.

All outputs and additional documents (including agendas, slides and meeting minutes) from the workgroup can be accessed on the REC Portal, here.

8 PROPOSED SOLUTION

The proposed solution for R0155 has focused on an evidentiary list of documents that Energy Suppliers may wish to refer to determine if a CoO has taken place. It has also focussed on required SLAs for Energy Suppliers to review evidentiary documents and communicate the outcome of their review process to the provider of the evidence (either the Consumer or a TPI).

The legal text changes for this proposed solution have been provided by the Code Manager ahead of the Party impact assessment. The relevant proposed changes for the Performance Assurance Reporting Catalogue (PARC) have also been provided. These can be found in section 9 of this Change Report.

The proposed legal text solution proposes the introduction of a new REC Schedule titled ‘Non-Domestic Change of Occupier.’ The REC Schedule would only apply to Non-Domestic Premises and would set out obligations for Energy Suppliers in relation to a CoO at a Non-Domestic Premise including:

- Obligations relating to a CoO without a Switch
- Obligations relating to a CoO with a Switch

- A non-exhaustive list of example evidence which Energy Suppliers might seek to rely upon in assessing whether there has been a CoO
- The Service Level agreements (SLAs) for Energy Suppliers, upon receiving notification of a CoO, to determine and communicate to the Consumer that there has been a CoO, or not, and whether the Energy Supplier has sufficient information to make such a determination for a CoO without a Switch; and
- The SLAs for a CoO with a Switch whereby the Losing Supplier must determine whether there has been a CoO and notify the Gaining Supplier.

The below table provides a summary of the proposals included in the solution, listing the scenarios (Switch or no Switch) in which they could occur, the Energy Supplier(s) an obligation is placed on, which documents the proposal will be set out in, and any additional supporting documentation that will be provided. Further information on the list of evidentiary documents, and the SLAs for with and without a Switch can be found in sections 8.1 - 8.3 of this Change Report.

Proposal	Scenario	Obligation on	Where will it be set out	Any supporting documentation
List of evidentiary documents	No switch and with switch	Existing and gaining supplier	New REC Schedule – it will be set out that this is not an exhaustive list	Guidance document – including examples of process and additional documents that could be requested
10 WD SLA for reviewing documents	No switch	Existing supplier	New REC Schedule	Guidance document – including examples of process
Within SLA reach an outcome (accept, reject, request additional information)	No Switch	Existing supplier	New REC Schedule	Guidance document – including examples of process
Within SLA communicate with consumer / whoever submitted evidence	No Switch	Existing supplier	New REC Schedule	Guidance document – including examples of process and potential to also communicate with existing consumer (ie name on live billing record)
On receipt of a switch objection with CoO flagged pass evidence to losing supplier	Switch	Gaining supplier	New REC Schedule	Guidance document – including examples of process
10 WD SLA for reviewing documents (decision required to accept or reject)	Switch	Existing supplier	New REC Schedule	Guidance document – including examples of process
Within SLA communicate decision with existing consumer and gaining supplier	Switch	Existing and gaining supplier	New REC Schedule	Guidance document – including examples of process
Performance assurance – SLAs, communication, SDEP process, evidence of process and justification	No switch and with switch	Existing and gaining supplier	Performance Assurance Reporting Catalogue New REC Schedule – including evidence retention obligations	SDES Definition SDEP User Guide

8.1 LIST OF EVIDENTIARY DOCUMENTS

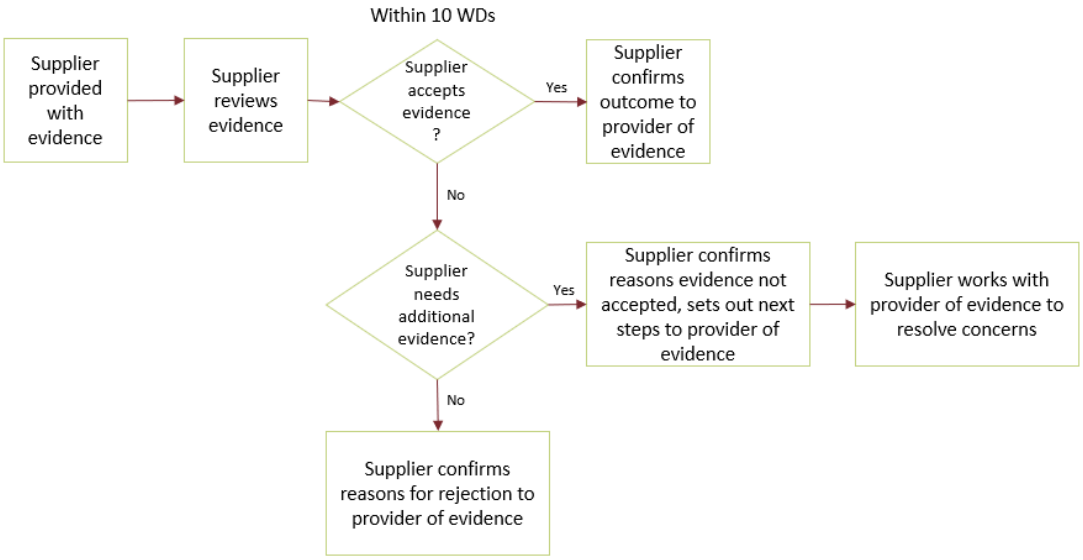
In the draft schedule there is an appendix with a list of evidentiary documents. The types of evidence provided in the list are non-exhaustive examples of the types of evidence which may be used to demonstrate that there has been a CoO. The existence or absence of the types of evidence in the list may not be conclusive either way, and the evidence available needs to be considered collectively.

Further examples of supporting evidence that may be used have been outlined in a supplementary guidance document that has been published alongside this Change Report and was included in the consultation. The guidance document will remain available after implementation of this Change Proposal.

8.2 SLA WITHOUT A SWITCH

An Energy Supplier would have 10 Working Days from receipt of documentation to either accept the CoO request, reject the request (for example if it is a duplicate request), or to confirm why the documentation has been queried and what additional information is required. This would take place by writing to whoever submitted the evidence (either the Consumer or a TPI). This can be completed via email if an email address is available. The Energy Supplier would then have an additional 10 Working Days on receipt of the requested additional evidence to confirm their decision.

The below process map shows the steps taken during a CoO without a Switch.



8.3 SLA WITH A SWITCH

When a CoO has taken place with a Switch, the Gaining Supplier would trigger the Switch with the CoO flag set to true, if they have received evidence to confirm a recent CoO has taken place. The Losing Supplier would decide if they agreed with the CoO or not.

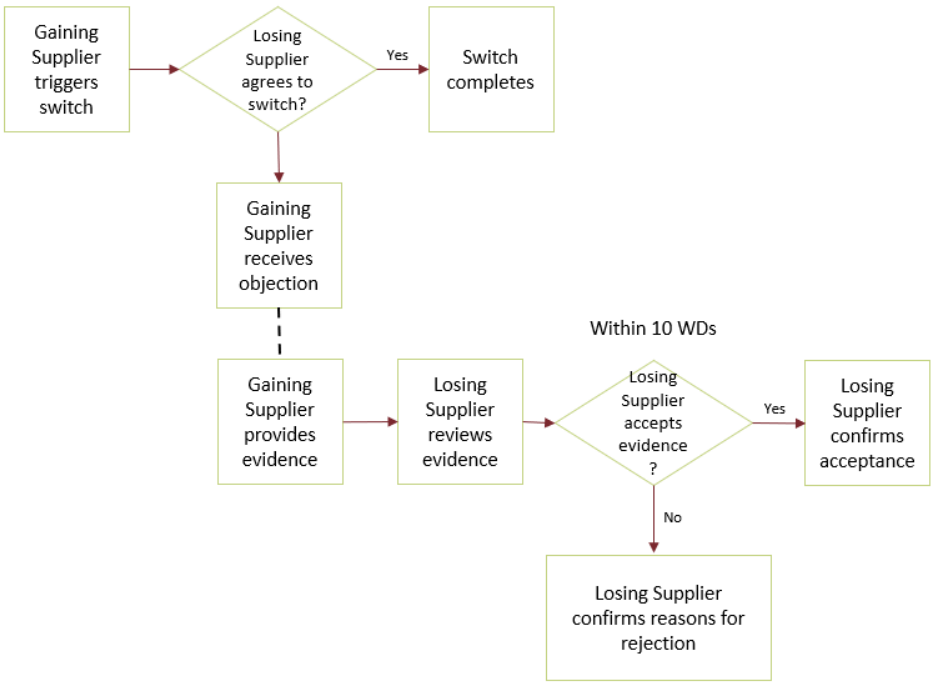
If the Losing Supplier does agree, the Switch completes and the Meter Point X Number (MPxN) transfers to the Gaining Supplier.

If the Losing Supplier does not agree with the CoO, then they have the right to object to the Switch. If they do object to the Switch, they must write to the Consumer confirming the reason(s) for the Objection. On receipt of the notice of Objection, the Gaining Supplier must decide on what to do next. However, this process is outside of the scope of the REC and has subsequently not been set out within the proposed solution for R0155.

If the Gaining Supplier decides the Switch will continue, then they can use SDEP to facilitate the sharing of the CoO evidence with the Losing Supplier. Evidence will be at a Consumer level but may contain multiple MPxNs. The Losing Supplier will have 10 Working Days to review the data and decide if they will accept or reject the evidence. The Losing Supplier will then confirm the

decision via the same SDEP screen and communicate with their Consumer to set out the reasons for the decision.

The below process map shows the steps taken during a Change of Occupier with a Switch.



8.4 AMENDMENTS TO EXISTING REC SCHEDULES

Paragraphs 2.7 and 6.3 of Schedule 23 – Registration Services will also be amended to reference the new Non-Domestic Change of Occupier Schedule, and to ensure consistency on wording of the timeframes to retain evidence. The proposed, red-lined wording can be found below:

2.7. A Gaining Supplier shall only indicate within the Switch Request that there has been a Change of Occupier where it has reasonable grounds to believe, having made reasonable enquiries of the Consumer, that the Consumer is a new owner or occupier. Where a Gaining Supplier submits a Switch Request which includes a notification that there has been a Change of Occupier, the Gaining Supplier shall keep (for at least ~~1 year~~ 12 months from the date of the Switch Request) a record of the evidence relied upon by the Gaining Supplier to support this position. Further details regarding appropriate evidence for a Change of Occupier at a Non-Domestic Premises are set out in the Non-Domestic Change of Occupier Schedule.

6.3. Where a Losing Supplier raises an Objection to a Pending Registration which has been identified by the Gaining Supplier as relating to a Change of Occupier, the Losing Supplier shall keep (for at least ~~1 year~~ 12 months from the date of the Objection) a record of the evidence relied upon by the Losing Supplier to justify that it has raised the Objection in accordance with its Energy Supply Licence and in respect of Non-Domestic Premises, the Non-Domestic Change of Occupier Schedule.

An additional Housekeeping Change will also be made by the Code Manager to make an amendment to Schedule 1 – Interpretations and Definitions to update the definition of Non-Domestic Supplier. Currently, the definition of Non-Domestic Supplier refers to suppliers who are not authorised to supply Domestic Consumers. This will be amended to also include those suppliers who are authorised to supply Domestic Consumers when active in relation to Non-Domestic Consumers. The red-lined wording for the Non-Domestic Supplier definition can be found below:

Non-Domestic Supplier -	means an Energy Supplier which is not authorised by its Energy Supply Licence to supply Domestic Premises, or an Energy Supplier which is authorised to supply Domestic Premises when acting in relation to Non-Domestic Premises.

Please note that since the change to Schedule 1 – Interpretations and Definitions will be introduced via a Housekeeping Change, the proposed change to the definition of Non-Domestic Supplier was not included in the Party impact assessment, and nor was it included in the consultation.

The Code Manager notes that this Housekeeping Change was raised by a respondent in the Party impact assessment, with the respondent asking for it to be included in full in the R0155 Change Proposal. After a review, including with REC legal advisors, the Code Manager will continue the change to Schedule 1 through a Housekeeping Change.

The Code Manager intends to include this Housekeeping Change as part of the wider Housekeeping Change for the February 2025 REC Release.

8.5 USE OF SDEP

SDEP is the REC's secure means of sharing data and for the R0155 solution will act as the secure mechanism for transferring the documents between the Gaining and Losing Energy Suppliers.

The Code Manager had hoped to introduce new, dedicated Non-Domestic Change of Occupier Process Type (PT) screens as part of this Change Proposal. However, due to the impacts of the MHHS Code Freeze, the SDEP Service Provider are unable to create these at this stage, so a dedicated set of PT screens will not be available immediately. In the interim, Energy Suppliers should use the following Duplicate Meter Point options for sending the information and for sending any escalations:

- PT0056 – Duplicate Meter Points General Query (Gas)
- PT0067 – Duplicate Meter Points General Query (Electricity)

The PT0056 and PT0067 SDEP screens were selected after careful consideration as they had the least traffic of all SDEP screens. When using these screens, in the interim, all queries should have a title that starts with “CoO evidence” to allow the recipient to easily identify them. Once new PT screens are available, these will be implemented with new dedicated screens for Non-Domestic CoO’s, with a separate PT screen for gas and electricity.

This aspect of the R0155 solution was discussed at the R0155 Working Group to establish if another tool could be used, for example Huddle, and the Working Group decided SDEP should be used. Similarly, no further alternatives have been provided as part of the Party impact assessment or industry consultation. The working group, the proposer and Ofgem also all agreed that R0155 could not be paused until the full SDEP solution could be implemented due to the ongoing risk of Consumer detriment. As such the Code Manager will include this temporary solution as the only viable, secure option as part of the R0155 solution until a new process step and escalation screens can be developed.

To ensure the interim SDEP solution is resolved as quickly as possible, the Code Manager has been continuously engaging with the SDEP Service Provider around dedicated PT screens throughout the process and this will continue. The Code Manager will progress a new Change Proposal to introduce the dedicated SDEP screens for Non-Domestic Change of Occupier as quickly as possible once the Code Freeze end point is confirmed. This will include a plan for queries raised at cut over and data retention obligations.

Market Participant involvement, in particular from Energy Suppliers, in the creation of these new screens will be of great importance. To assist with the development of these screens and ensure the interim SDEP solution is active for as short a period as possible, the Code Manager intends to discuss the new SDEP screens, and begin the solution development, at the February 2025 Change Issues Group meeting, prior to the Change Proposal being raised. As soon as either the Code Freeze has been lifted, and/or the SDEP Service Provider are able to impact assess the development of the dedicated PT screens, the Code Manager will raise the Change Proposal to amend the SDEP solution for the Non-Domestic Change of Occupier process and REC Schedule.

For further information on the Code Freeze, please see the dedicated Market Half Hourly Settlement (MHHS) – Code Freeze Impact page on the REC Portal.

8.6 PERFORMANCE ASSURANCE APPROACH

The Code Manager initially consulted with the Performance Assurance Board (PAB) on 30 July 2024 setting out options for assuring this change. There was significant focus from the PAB on preventing any issues, and having data led monitoring of performance across the market. The Performance Assurance approached agreed by the PAB was then issued for the Party impact assessment. Following the Party impact assessment, and concerns raised there, and further

engagement with a number of Energy Suppliers, the Code Manager consulted again with the PAB on 26 November 2024. The Code Manager further set out options for this Change Proposal, including reflecting upon, and taking into account, the response received from the Party impact assessment, and early responses from the industry consultation.

There was significant focus from the PAB on preventing any issues, and having data led monitoring of performance across the market. They requested two activities:

1. Assurance before implementation to gain confidence that Parties were ready to operate in line with the changes to the REC; and

2. Ongoing monitoring to identify outliers or anomalous behaviour, which the Code Manager would then follow up in detail. Further details on the methodology for this are included in the Performance Assurance Methodology and Techniques Document.

The Code Manager has proposed that the assurance before implementation will take place via a requalification style review using an information request, to be issued at the point of approval of this change. Further details can be found in section 8.6.1 of this Change Report.

The Code Manager will also use ongoing monitoring once this Change Proposal has been implemented. The data sources for this monitoring will be Switching data received from the CSS, and data received from Energy Suppliers on the time taken for a Non-Domestic Consumer's request to agree to a Change of Occupier. Further details can be found in section 8.6.2 of this Change Report.

Further details and rationale of the Performance Assurance reporting and approach can also be found in the R0155 – Updates on Performance Assurance guidance document V2.0. This document has been updated following the industry consultation, to assist REC Parties in their understanding of the rationale of these reporting requirements and how the information request (pre-qualification style assessment) will be conducted and to reflect the new Performance Assurance approach.

8.6.1 INFORMATION REQUEST

The information request, acting as a re-qualification style review, proposed by REC Performance Assurance, will require Parties to respond to an information request where they outline the step(s) they have, or will take, to implement the required changes for R0155. This is to gain confidence that Parties are ready to operate in line with the change. This request will be issued to licenced Energy Suppliers who have Non-Domestic Premises within central systems.

Below are examples of the questions that may be included in this information request:

1. What internal documentation and training are you providing to your staff and agents to correctly identify a valid Change of Occupier, a possible Change of Occupier that needs more information or an invalid attempt to use Change of Occupier processes?

2. Have you identified and implemented any necessary changes to your systems to be able to track Change of Occupier, prompt staff and agents to take relevant steps and execute the revised processes introduced by R0155?

3. How will you monitor the application of the internal documentation and training you provide so that all staff or agents apply it consistently?

4. How will you monitor your compliance with the timelines?

5. How do you monitor long running or repeated attempts to use Change of Occupier processes that you are not able to complete?

8.6.2 ONGOING MONITORING

After further consultation with the PAB, and through feedback received from REC Parties, the Code Manager has determined that the most appropriate method of assessing compliance is through direct sampling of Energy Supplier compliance based upon pre-existing market data. This will be based on two specific data sources:

1. Switching data received from CSS, which indicates the rate of objections to Non-Domestic Switches with the Change of Occupier flag set to true.

2. Data received from Energy Suppliers on the time taken for a Non-Domestic Consumer's request to agree to a Change of Occupier. This information will be requested by Ofgem as part of an RFI and to simplify the process for Energy Suppliers we intend on requesting the same data. This reduces the need to make two related but different reports in the same topic area.

These data sources do not measure compliance but indicate higher risks relating to non-compliance. Therefore, Parties that appear to have a higher risk will be sampled, which will involve the inspection of records in detail to assess if Consumers that have requested a Change of Occupier have had their case handled in line with the Code requirements.

8.6.3 PERFORMANCE ASSURANCE REPORTING CATALOGUE (PARC)

A provisional version of the Performance Assurance Reporting Catalogue (PARC) was provided with the Party impact assessment and again for the industry consultation, outlining the proposed reporting requirements. After a review of impact assessment responses, and taking into consideration the revised approach to Performance Assurance after the PAB meeting on 26 November 2024, the updates previously proposed to the PARC will no longer be included as part of Change Proposal R0155.

Following further requests around the Performance Assurance approach, and a request for further clarity to reduce the burden on Energy Suppliers, the Code Manager now intends to update the PARC to include direct reference to regular reporting that Ofgem will be consulting on in 2025 (hereby referred to as the Ofgem RFI). This RFI concerns the data received from Energy Suppliers on the time taken for a Non-Domestic Consumer's request by Ofgem as part

of an RFI, and to simplify the process for Energy Suppliers, REC Performance Assurance intend on requesting the same data. This reduces the need to make two related, but different reports in the same topic areas.

This Ofgem RFI is set to be issued in Q1 2025, and the Code Manager does not expect the outcome of the Ofgem RFI to be confirmed and actioned upon until after the approval, and potentially the implementation, of R0155. Consequently, the updates to the PARC, to include direct reference to the Ofgem RFI, cannot be implemented until after the R0155 implementation date. As such, the Code Manager will raise a subsequent, separate Change Proposal, to update the PARC after the conclusion of the Ofgem RFI. This date is to yet be confirmed, but the Code Manager will raise, and provide further information on, the subsequent Change Proposal to update the PARC as soon as possible. The Change Proposal for the PARC will be subject to the usual REC Change Process.

To support REC Parties to prepare for the update to the PARC following the Ofgem RFI and the anticipated separate REC Change Proposal (and to assist with their preparations and system changes for R0155) an example of what the PARC **may** look like, can be seen below. Please note, this is only a potential template of what may be included in the PARC as a result of any subsequent Change Proposal. To ensure that the request is in line with the Ofgem RFI, the PARC will not specify the exact data items, but rather just the information as required by Ofgem in the RFI.

Ref #	Data Category	Data Item	Description	Provided by which REC Party	Frequency	Date First Required	Pre-Existing	Prepayment Meters Only?	Domestic	Micro-Business	Commercial	REC Obligations	Retail Risk
1451	Change of Occupier Request	COO Aggregate Data	Non-Domestic RFI, Change of Tenancy (Electricity) tabs, as specified by Ofgem.	Suppliers	The month of the next reporting cycle following the due date of the Ofgem RFI.	Per Ofgem RFI	N	No	N	Y	Y	Schedule X Non-Domestic Change of Occupier Schedule	II. Retail market processes are not effective or efficient, including the incomplete or inaccurate updating of REC data. III. Consumer interests and data are not protected in the operation of the REC.
1452	Change of Occupier Request	COO Aggregate Data	Non-Domestic RFI, Change of Tenancy (Gas) tabs, as specified by Ofgem.	Suppliers	The month of the next reporting cycle following the due date of the Ofgem RFI.	Per Ofgem RFI	N	No	N	Y	Y	Schedule X Non-Domestic Change of Occupier Schedule	II. Retail market processes are not effective or efficient, including the incomplete or inaccurate updating of REC data. III. Consumer interests and data are not protected in the operation of the REC.

8.7 GUIDANCE DOCUMENTS

The Code Manager has developed an additional resource, in the form of a guidance document, alongside the proposed REC Non-Domestic Change of Occupier Schedule. It is not a mandatory requirement to follow and can be updated by the REC Code Manager as required. This main, non-binding, guidance document is titled ‘R0155 – Non-Domestic Change of Occupier Guidance’.

The non-binding guidance document has been developed at the request of the R0155 working group to support the progression and implementation of this Change Proposal as an additional resource alongside the proposed REC Non-Domestic Change of Occupier Schedule. It provides supplementary lists of evidentiary documents, further examples, scenarios, and clarifications but does not set out a competing list of evidence options. The Code Manager has been happy

to develop and deliver the guidance document alongside this Change Proposal. The guidance document has, to date, been well received. This guidance document is not a categorised REC document and may be updated prior to, and post-implementation, by the Code Manager, but will remain available to all Market Participants.

The R0155 – Non-Domestic Change of Occupier Guidance has been updated to V1.1 to reflect the comments received, and the suggestions made, during the industry consultation. This document can be found, here.

The Code Manager has also published a supplementary Performance Assurance guidance document. This second guidance document explains the rationale behind the requirements and details of amendments made on the Performance Assurance requirements following responses to the Party impact assessment and the consultation. This document is titled 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales' and has been updated to V2.0 after the industry consultation to reflect any amendments in response to the comments received, and to cover the updated Performance Assurance approach. This document can be found, here.

9 DRAFT LEGAL TEXT

The legal text to deliver the proposed solution of the Non-Domestic Change of Occupier Schedule for R0155 can be found here.

The legal text for the amendments to Schedule 23 – Registration Services can be found here.

9.1 DRAFT GUIDANCE DOCUMENTS

The main guidance document including supplementary lists of evidentiary documents, further examples, scenarios, and clarifications titled 'R0155 – Non-Domestic Change of Occupier Guidance Document' can be found here.

A supplementary guidance document explaining the Performance Assurance reporting requirements and their rationale, titled 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales', can be found here.

PRELIMINARY ASSESSMENT

10 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

10.1 SERVICE PROVIDER IMPACT ASSESSMENTS

A Service Provider impact assessment was completed by the REC Performance Assurance function of the Code Manager between 28 June 2024 and 02 August 2024. The purpose of this Service Provider impact assessment was to determine the Performance Assurance requirements for this Change Proposal. A summary of the response is detailed below.

REC PERFORMANCE ASSURANCE	• REC Performance Assurance (RPA) noted that the assurance approach was planned to be a two-tiered solution to include:
	  ○ The application of preventative assurance techniques to review that Parties have designed and tested their systems processes and controls at the point of implementation
	  ○ The application of enduring risk monitoring techniques to deter outliers whether further techniques may be applied to identify and manage issues.
	• RPA proposed a re-qualification style review at the point of implementation that would require Parties to respond to an information request where they outline the steps they have taken to implement the required changes.
	• RPA confirmed that R0155 will require a change to the PARC, which is a Category 2 REC document and should be included within the R0155 solution development to streamline implementation.
	• RPA confirmed they would require data from Switching data with the CoO flag from CSS, total number of Switch Requests by Energy Suppliers, and total number of successful Switches by Energy Supplier. Reporting on volumes and timeliness of CoO with Switch process by Energy Supplier will be taken from SDEP.
	• RPA reported that the following Performance Assurance Framework (PAF) products and processes will require updates: PARC, Retail Risk Register, Performance Assurance Dashboards; and development and implementation of re-qualification style assessment at the time of implementation.
	• There will costs associated with the design, build and testing of the report development, dashboard build, and re-qualification style assessment totalling £81,400.
	• 12 assumptions were made as part of the impact assessment. These were:
	  1) That reports from central sources will be available to operationalise the assurance approach endorsed by REC Performance Assurance Board (PAB). Where this changes, additional impact assessment will be required.
	  2) All required reports will be built as part of the solution and will be available from the point of implementation.
	  3) Reporting will contain sufficient detail to allow Parties to investigate exceptions where they occur, i.e. MPxN level detail will be provided.
	  4) The design and reporting will include a unique reference that allows mapping of Switches across CSS and SDEP.

	5) That there will be no use of alternative APIs for this service. Whilst this would not be an inherent issue, RPA impact assessed with their current knowledge of the design. 6) Test data will be available from Service Providers to support the build and test activity for RPA. 7) The Service Providers will be able to share these reports through the existing agreed methods. 8) Requalification will apply to all suppliers. RPA have assumed this will be required for 60 Parties for the purpose of providing an estimate. Further work is required as part of the re-qualification design activity to develop the full scope for re-qualification activity and determine the number of Parties who will need to re-qualify. 9) That Parties will engage with the re-qualification and annual MoQ processes. Any escalations for disengaged Parties will be managed through existing Operational Account Manager (OAM) and additional PATs route. 10) Cost estimates are based on rough magnitude of effort we anticipate and do not account for any complexities emerging. 11) The rates used to estimate costs are based on current rate card. Actual cost for delivery will be dependent on the timeline of implementation and actual rates will be agreed within the CR based on rate card in use at the time of delivery. 12) That there will be less than five escalations to PAB each year, and that if this turns out to be incorrect that RPA will revisit this impact assessment.

10.2 REC PARTY IMPACT ASSESSMENT

A Party impact assessment was issued on 23 August 2024 and closed on 27 September 2024. A total of 18 responses were received from 12 Energy Suppliers, one TPI, three Trade Associations, and two Consumer Representative groups. Four of these responses were submitted confidentially. The non-confidential responses have been published**,** here.

The Party impact assessment targeted responses on three separate aspects of this Change Proposal. These being the legal text solution containing the non-exhaustive list of evidentiary documents and SLAs, the use of SDEP, and the Performance Assurance requirements. The Party impact assessment was laid out with three sections of questions to reflect this. A summary of responses can be found below for each of these three sections.

10.2.1 SUMMARY OF RESPONSES ON THE LEGAL TEXT SOLUTION

ENERGY SUPPLIERS	• Overall, Energy Suppliers were broadly supportive of the proposed solution, but there were asks for further clarity and amendments to the draft schedule, as well as additional consideration for the levels of evidence included in the non-exhaustive list. • Respondents were broadly supportive of the list of evidentiary documents, stating that they will ensure consistency to allow Energy Suppliers to justify their decisions, and are acceptable forms of evidence. • Two respondents called for the list to become exhaustive to ensure further consistency, and to avoid any open debates or misinterpretations. • One respondent did not agree with the proposed solution as they believe, in the current form, the proposal risks creating an unnecessarily complex Consumer journey, and increases Energy Supplier's costs without improving Consumer outcomes, particularly when a Switch is involved. • Of those supportive of the proposals, there was broad support for the proposal to be introduced through a new REC schedule, titled "Non-Domestic Change of Occupier Schedule". • One respondent suggested that alongside the new schedule, the list of evidentiary documents should be introduced as a standalone Category 2 Code document. • Multiple respondents believed that the current wording of the REC schedule did not make the timescales required to review evidence that had been additionally requested abundantly clear, and that this could lead to confusion, misinterpretation, and poor Consumer outcomes. Respondents raised concerns and confusion around the legal text referring to the 10 Working Day SLA being from "receiving notification of a Change of Occupier", and believed the text should be amended to refer to receipt of requested evidence. • All but one respondent agreed with the 10 Working Day SLAs for CoOs both with, and without, a Switch. • One respondent did note that despite being supportive of the 10 Working Day SLAs, this could be a challenging contraction in timescales for some Energy Suppliers that could require significant investment in human or systems resource to implement. • One respondent highlighted that in some extraordinary circumstances, such as multi-site contracts, the 10 Working Day SLA could be challenging, and that for such scenarios a longer general timeframe should be applied for this scenario.

	• Two alternative solutions were suggested as part of the impact assessment. One suggestion was for the list to become definitive and ensure that only evidence listed in the REC schedule should be acceptable, whilst another suggestion was based on a 'reasonable steps' framework. • Respondents provided mixed feedback on the costs to their business for implementing the proposed solution. Some respondents stated that there would be no costs associated with the proposed solution, whilst some Energy Suppliers highlighted minor costs as result of additional reporting, staff training, and limited system and process changes. • No respondents provided specific costs and/or cost examples. • Most respondents stated that their organisations would need a 6-month lead time for implementation, although this could be shortened if Performance Assurance reporting requirements were reduced. A small number of respondents informed the Code Manager a 1–3 month lead time would be required, whilst a small number stated they believe a 12 month lead time would be appropriate to implement the solution.
THIRD PARTY INTERMEDIARY (TPI)	• The TPI respondent stated that they believe the solution would still lead to poor Consumer experiences. • The respondent stated that a 10 Working Day SLA is better than having no SLA at all but believes that a 5 Working Day SLA for reviewing documents would be more suitable as it would fall in line with the industry's Faster Switching and be more economical. This would also prevent suppliers responding on the 10th day and generating more revenue due to extending out a Consumers time on supply on higher deemed prices. • The respondent noted some risks, including the increased risk of "miss selling occurring" or Energy Suppliers using higher deemed prices and a negotiation and sales tool. • The TPI did not envisage a cost to implement, however it was noted that this could change depending on if/how the CoO process is included into the TPI Code of Practice (R0137/A).
TRADE ASSOCIATIONS	• Overall, Trade Association respondents were generally supportive of the proposed legal text solution, and believe the change should be made, but offered areas of consideration and further clarifications. One respondent specifically noted that whilst agreeing that the proposed solution seeks to address the core problem, the current wording in several key paragraphs appears too vague, and this could lead to misinterpretation and potential inconsistencies in implementation. • One respondent, whilst agreeing with the proposed SLAs, requested that Energy Suppliers be capped on the number of documents that can be requested from the Consumer, and that

	the list of evidentiary documents becomes an exhaustive list; to align with the way other standard proof of identity checks operate. • One respondent noted that the 10 Working Day SLA for reviewing the initial requested evidence seems reasonable but suggested that the timeframe to review submissions following any requests for further information should be subject to a tighter timeframe of 5 Working Days, due to the potential harm that delays may cause to Consumers. • No costs were identified by the Trade Association groups to implement this Change Proposal.
CONSUMER REPRESENTATIVE GROUPS	• The Consumer Representative Group respondents were supportive of the proposed solution and believe it appropriately addresses the problem statement. • One respondent noted that the solution will allow the REC to monitor volumes of contact between Energy Suppliers through SDEP, providing valuable insight into the process usage and how long Energy Suppliers are taking to respond, should performance issues occur. • One respondent noted that from experience, complaints and disputed position by two Parties often occur due to unclear wording and misinterpretations. The respondent said the current legal text looks straightforward and is reasonable. • The respondents supported the introduction of the 10 Working Day SLA. • Respondents noted through this solution they would expect to see a reduction in disputes concerning Non-Domestic Change of Occupiers, and lead to a more positive Consumer experience. • One respondent noted they would need a 3–4-week lead time to inform and train their operational teams on the solution.

10.2.2 SUMMARY OF RESPONSES ON THE USE OF SDEP

ENERGY SUPPLIERS	• Energy Suppliers raised their concerns and difficulties with using SDEP but recognised that as the REC secure means of sharing data, SDEP would be used. • Respondents were offered an opportunity to suggest alternative options to replace SDEP, however no alternative were suggested as part of the impact assessment. • Many respondents expressed concerns around the initial proposal to allow bi-laterally agreed, alternative, forms of sharing data between Energy Suppliers, asking for this option to be removed and for SDEP to become the only mandated method for Energy Suppliers.

	• As part of the interim and full R0155 solution, Energy Suppliers expressed their preference of the creation of new process type screens, to be used for Non-Domestic Change of Occupiers.
THIRD PARTY INTERMEDIARY (TPI)	• The TPI respondent informed the Code Manager that the use of SDEP is not applicable to TPIs as part of this Change Proposal.
TRADE ASSOCIATIONS	• No comments were provided from Trade Associations on the use of SDEP.
CONSUMER REPRESENTATIVES	• No comments were provided by Consumer Representative Groups on the use of SDEP.

10.2.3 SUMMARY OF RESPONSES FOR THE PERFORMANCE ASSURANCE REQUIREMENTS

ENERGY SUPPLIERS	• Overall, Energy Suppliers were not supportive of the Performance Assurance requirements, with respondents raising concerns around the MPxN level data, the proportionality of reporting when factoring in the scale of the Change Proposal and raised concerns around the need for a re-qualification style review, asking for further clarity to be provided by REC Performance Assurance on the proposals. • Many respondents provided recommendations for the use of aggregated data, rather than MPxN line level data. • Respondents raised concerns about the inclusion of metrics for Domestic Consumers, despite the change not specifically targeting such Consumers. Respondents asked for this to be removed from the reporting. • Respondents were against the re-qualification style review, unless the proposal was amended to ensure it is not unduly onerous on Energy Suppliers and does not risk a duplication of effort. Respondents still noted that the requirements were disproportionate, and concerns were raised that this goes above and beyond the remit of the REC. • Respondents noted that with a reduction in the level of Performance Assurance reporting, less time and resource would be required to update their reporting systems, and as such this would mean a shorter lead time would be required for the implementation of this Change Proposal, thus allowing an earlier implementation. • Respondents provided mixed responses on whether the proposed approach could have negative impacts on their organisations financially. Some respondents noted that there would be no, or minimal, additional costs, whilst other respondents noted that due to the additional resource that would be required to provide the requested information, there will be inflated costs for Energy Suppliers.

THIRD PARTY INTERMEDIARY (TPI)	• The TPI respondent informed the Code Manager that the Performance Assurance reporting requirements were not applicable for a TPI as part of this Change Proposal. • The respondent noted however that there are no escalation methods for Consumers and/or third parties. The respondent noted that TPIs would be able to provide trends highlighting issues with certain suppliers, should such a method exist.
TRADE ASSOCIATIONS	• One Trade Association stated that whilst the Performance Assurance requirements were not directly relevant to their members, they were supportive of the proposals that will hold Energy Suppliers to account. • One respondent raised a number of points and concerns to consider to ensure the best outcomes of a process that is intended to work smoothly and efficiently to benefit Consumers. The respondent noted that reports should be proportionate and focussed only on this Change Proposal, and that assurance should be industry wide, with aggregate level data rather than MPAN level. They also noted that the request should avoid duplication with existing reports and/or planned reports. • The Code Manager was asked by a respondent to commit to review the approach and necessity of ongoing assurance; to clearly define the intended outcomes of assurance and the metrics used to evaluate Energy Supplier's performance; and share aggregate industry wide monitoring with Energy Suppliers on an ongoing basis in the same format as shared with Citizens Advice and Ofgem.
CONSUMER REPRESENTATIVE GROUPS	• One Party responded to the Performance Assurance questions, and they stated that they agreed with the Performance Assurance requirements for this change and believed that the centralised reporting requirements will provide sufficient overview of how Energy Suppliers are progressing CoOs when there is a Switch. • The respondent also supported the self-reporting requirements and believed these to be sufficient.

11 BUSINESS CASE ASSESSMENT

11.1 COST BENEFIT ANALYSIS

COSTS	DESIGN/ DEVELOPMENT COSTS	BUILD/IMPLEMENTATION COSTS	ONGOING OPERATIONAL COSTS
REC PERFORMANCE ASSURANCE	£16,900	£69,000	£0

REC BUDGET APPROVAL SECURED FOR CENTRAL SYSTEM COSTS	06/12/2024

The REC Performance Assurance costs were provided as part of the Service Provider impact assessment. Further details on this impact assessment can be found in section 10 of this Change Report. Please note, that these costs are subject to change following the amendment of the Performance Assurance proposals. However, the costs will not exceed those presented in this Change Report.

For REC Performance Assurance, the design/development costs refer to all costs associated with report development, and the design, build and testing phases of the dashboard. The implementation costs refer to the total costs associated with the implementation, and completion of the re-qualification style review. REC Performance Assurance have confirmed that they do not anticipate any additional ongoing operational costs, beyond those outlined in the design/development and implementation costs. However, this is subject to availability of data from central sources for risk monitoring and volume of escalations presented to the PAB.

Energy Suppliers informed the Code Manager during the Party impact assessment that there would likely be costs to their business because of this Change Proposal, however no precise costs were defined. The Code Manager will seek further information on the costs on Energy Suppliers, and other REC Parties, during the upcoming consultation.

11.2 BENEFITS

The Code Manager has identified the subsequent Intangible Benefits that would be achieved through the implementation of this Change Proposal.

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
IMPROVED CONSISTENCY BETWEEN ENERGY SUPPLIERS	At present, there are inconsistent requests from Energy Suppliers for the requested evidence that are requested as part of the CoO process, including type and number of documents. R0155 provides a non-exhaustive list that can act as a clear set of evidentiary standards for Energy Suppliers to follow. This will allow the possibility of increased consistency between Energy Suppliers in the types of evidence that are requested. Similarly, the introduction of the non-exhaustive list will be able to improve the quality of evidence provided, ensuring there is a consistent level of quality. This increased consistency will allow for easier communication between Energy Suppliers, and Consumers, who will gain a greater understanding of the process when a CoO occurs with a Switch.

POSITIVE CONSUMER EXPERIENCES WITH APPROPRIATE TIMESCALES	Consumers are currently faced with lengthy, and inconsistent timings to have new billing accounts set up, or new contracts agreed with their Energy Supplier. Delays particularly occur when evidentiary documents are being reviewed by the Energy Supplier. R0155 introduces a 10 Working Day timescale for Energy Suppliers to review requested evidence. This will create a positive Consumer experience as they will become fully aware of when they will hear about their CoO request, ensure consistent communication from the Energy Supplier, and reduce the length of time that the Consumer may be placed on expensive deemed prices. As highlighted in the Party impact assessment by a Consumer Representative group, the R0155 solution would also reduce the number of disputes, and lead to a more positive Consumer experience and outcome.
FINANCIAL BENEFITS FOR THE CONSUMER	Deemed prices and contracts are often more expensive than contract terms. The proposed R0155 solution seeks to ensure fair timescales are followed to manage a CoO. This will provide positive financial benefits for the Consumer as they will not be left on deemed prices for unreasonable periods of time. The R0155 solution also ensures a reduction in the risk of the Consumer being held responsible for the previous occupier's debt and contract, thus saving the Consumer further financially.
ENSURING DATA IS SHARED SECURELY AND SAFELY	Energy suppliers have noted to the Code Manager that evidentiary documents (Consumer data) may currently be shared via email. Email is not a secure means of sharing data, and thus may put the Consumer's data at risk. R0155 mandates the use of SDEP, as the REC's secure means of sharing data, to share evidentiary documents, and other forms of data. By mandating that REC Parties use SDEP, data will be shared securely and safely as part of the CoO process.
CLEAR COMMUNICATION AND UNDERSTANDING FOR TPIS	Under the current CoO process TPIs may struggle to provide Consumers and Energy Suppliers with a service due to the varying processes for each Energy Supplier and different evidence being available from each Consumer. The R0155 solution will support TPIs in understanding the CoO process that will be followed by all Energy Suppliers, providing a greater understanding of the types of evidence a Consumer may provide and is deemed acceptable. It will also ensure that there is a consistent level of communication, that will avoid them being seen to be stuck in the middle of an ongoing process between Energy Suppliers and the Consumer.

11.3 COST BENEFIT ANALYSIS

The Code Manager believes the cost and effort of the implementation of this Change Proposal is proportionate to the benefits being brought by the proposed solution. Currently, the Non-Domestic CoO process is causing significant concerns and difficulties for Energy Suppliers, TPIs as well as Consumers. The Code Manager believes the change should be made with the intangible benefits of implementing the solution outweighing the associated costs.

Similarly, as noted by Consumer Representative groups, the cost and time savings for Consumers provided by this solution, including reducing the time Consumers may be on expensive and lengthy deemed contracts, are likely to be significantly greater than the costs associated to implement the solution, providing a positive Consumer cost-benefit outcome.

12 CASE FOR CHANGE

The Code Manager believes there is a positive case for change and that R0155 better facilitates the following REC Objectives:

OBJECTIVE	IMPACT TYPE	DESCRIPTION AND JUSTIFICATION
To ensure the REC operates and evolves in a manner that facilitates the achievement of its mission statement[1]	Positive	The REC's mission is to "facilitate the efficient and effective running of the retail energy market, including its systems and processes". The current processes for a Non-Domestic Change of Occupier are causing detriment to Energy Suppliers, Consumers, and Third-Party Intermediaries alike, and does not ensure an efficient and effective CoO process. R0155 provides a more efficient and effective process by introducing agreed evidentiary standards and timescales. As noted in the Party impact assessment and industry consultation responses, Retail Energy Market Participants believe the proposed R0155 solution will resolve the problem statement and make the processes more efficient. The proposed reporting requirements will also ensure that Energy Suppliers adhere to Code obligations, that will provide efficient and effective CoO processes, resulting in positive Consumer outcomes, that are relative to the operational costs and impacts for Energy Suppliers. As highlighted in consultation responses, this change will provide costs saving to both REC Parties and Non-Domestic Consumers.
To ensure customers interests and data is protected in the operation of the REC	Positive	The current CoO process risks Consumers (customers) being held responsible for previous occupiers' debts and contracts and also presents a risk of being placed on long lasting, more expensive deemed contracts. When a CoO occurs, consumers are also facing inconsistent requests from Energy Suppliers around proof of evidence for the CoO, as well as inconsistencies with a timely process of having evidence reviewed and new contracts being agreed. This is detrimental to Consumer's interests and their data protection. R0155 will reduce these risks and Consumer's detriment by ensuring that Consumer's interests are protected through the introduction of a reasonable SLA to review evidentiary document for a CoO and reducing the length of time they are on unfavourable deemed contracts.

[1] REC Mission Statement

		Similarly, the introduction of the non-exhaustive list of evidentiary standards and documents will ensure the requests from Energy Suppliers are fair and consistent, and the Consumer's data from these documents are securely shared amongst Energy Supplier's through a mandated, secured system. As noted by the Consumer Advocate group, Citizens Advice, this change will improve the experience of non-domestic Consumers, protecting their interests by reducing the period they may be on deemed rates, and reducing the risk of the build-up of debt for a Consumer, and provide much needed consistency for Non-Domestic Consumers in the Non-Domestic supply market.
To drive continuous improvements and efficiencies in the operation of the REC and the central systems and communication infrastructures it governs.	Positive	Currently, as part of the CoO process, it is optional if REC Parties use central systems and communication infrastructures (such as SDEP) to communicate between each other. Many Parties have noted their concerns around not only SDEP, but also the use of potential other means of sharing data, such as bilateral agreements and transfers. Bilaterally agreed methods of transferring data poses a risk around the efficiency of the REC, so by removing this option, and mandating SDEP (the REC's secure means of sharing data), R0155 ensures efficient and appropriate use of the central systems and communication infrastructure in place under the REC.

13 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 05 November to obtain views on the Change Report (for consultation) that contained the Preliminary Assessment. In total 20 responses were received from eight Energy Suppliers, two Trade Associations/Bodies, one TPI, Citizens Advice, and eight Confidential responses. A consolidated consultation response document containing all the non-confidential responses and Code Manager comments can be found, here. The key themes from these responses have been summarised and set out below.

13.1 SUMMARY OF RESPONSES

Overall, respondents were in support for the introduction of the new REC Non-Domestic Change of Occupier Schedule and believed that this change should be made. However, concerns were raised around the implementation date, the interim SDEP solution, and the Performance Assurance requirements.

Those in support of the change stated that that solution would bring about Consumer benefits whilst addressing issues identified in Ofgem's Non-domestic market review, improving the CoO process and also Consumer's confidence in the process. The solution would also prevent Consumers from being left on costly deemed contracts. Further, respondents noted that the non-exhaustive list will help cut down on the time Consumers are going "back and forth" with their supplier and provides much needed consistency for Non-Domestic Consumers that will be

easily understood, whilst also, through Performance Assurance, ensuring there is less chance of Consumers being pursued for debt that does not belong to them. One respondent believed that the introduction of the 10 Working Day SLA would mean the change would encourage clearer communication between Energy Suppliers and Consumers, that would help reduce the risk of detriment to Consumers and improve Consumer confidence in the sector.

Those against the change noted reasons including the proposed Schedule being overly-bureaucratic for the solution and problem the Change Proposal is seeking to achieve with a recommendation that guidance documents would suffice; that the list remains non-exhaustive with the ability for Energy Suppliers to request an uncapped number of documents; concerns around the use of SDEP; and due to the level of reporting requirements that would require system changes for Energy Suppliers. One respondent also noted that they were against the change as the proposed solution does not go far enough. The respondent requested a shorter SLA for Energy Suppliers to review evidence submitted. The Code Manager has addressed these concerns within the consolidated consultation responses document and has made amendments to the solution where required. These are documented in Section 14 of this Change Report.

13.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

The majority of respondents noted that should the proposed solution be implemented, then the introduction of a new REC Schedule, titled Non-Domestic Change of Occupier, is the most suitable approach. Some minor typography amendments were suggested to the Code Manager, that will be actioned ahead of the Final Recommendation.

The Code Manager received some comments asking for the legal text to be amended to include an exhaustive list of evidentiary documents, for the SLAs to be reviewed, and for drafting to be included around edge cases, or extraordinary scenarios, where the SLA may not be achievable. In response, the Code Manager notes that the exhaustive list and SLAs were drawn up based on detailed discussions at the R0155 Working Group and redrafted by REC Legal advisors. During the Working Group discussions, it was clear that there is no possible exhaustive list solution for the list of evidentiary documents or Energy Suppliers' validation steps. The R0155 solution sets out a solution for the majority of cases while also allowing suppliers flexibility if required. This includes an Energy Supplier not requesting any evidence.

One respondent considered the proposed REC schedule to be unnecessary, and that the level of detail required for this proposal and the Change of Occupier process was should not be written into a REC Schedule. The respondent stated that they believed the same outcome could be achieved via a well-worded guidance document, arguing that guidance documents have proved sufficient to undertake compliance enforcement, previously. The Code Manager does not agree with this proposed approach and notes that by including the solution in Code, rather than guidance documents, it ensures that REC Parties are obliged to follow the evidentiary standards and timescales to ensure Consumer benefits are provided, allows Performance Assurance to be applied to protect industry standards and Consumer's interests and ensures that the obligations are subject to an industry change process that is open to all Market Participants and Consumers.

The Code Manager can ensure all Market Participants that the new Schedule will be subject to the same rules and change process as the rest of the REC.

No comments were provided on the proposed amendments to Schedule 23.

13.3 BENEFITS RELATIVE TO IMPLEMENTATION AND OPERATIONAL COSTS

Respondents noted the Consumer benefits that would be brought about by this change, with some respondents also noting that their organisations would also see operational benefits from further clarity, and consistency within the Non-Domestic Market. One Trade Body noted that the Consumer facing solution is workable and pragmatic, balancing the benefits of having a streamlined solution and the need to prevent fraud. However, these benefits may not be relative to operational costs with the required reporting requirements. Many Energy Suppliers also acknowledged that there would-be operational costs, including one off implementation costs and ongoing costs, by implementing this change. Respondents noted operations costs for staff training, new Consumer communications, and new monitoring and reporting processes.

The majority of expected costs were centred around the Performance Assurance reporting requirements. Many respondents noted that they supported the Change due to the Consumer benefits that would be provided, such as reducing the negative outcomes around debt, but were concerned if the benefits were relative to the costly reporting requirements. Unfortunately, though, no respondent provided specific details of any costings associated with the implementation of this Change Proposal. In response, the Code Manager has reviewed and reduced the reporting requirements. The Code Manager hopes that this in turn should ensure that the benefits are more relative to the, reduced, operational costs.

From a Consumer perspective, Citizens Advice believed that the benefits of this change will significantly outweigh the costs. Citizens Advice noted that the time and resource reductions for Non-Domestic Consumers from having a clearer process in communicating with Non-Domestic Suppliers will provide cost savings to businesses and Energy Suppliers. They also noted that reducing the period and likelihood for which Consumers are left on deemed contract rates, will also provide crucial benefits.

13.4 CONSUMER BENEFITS

Specific Consumer benefits, or the need to implement this Change Proposal to ensure Consumer benefits and/or that Consumer detriment is reduced, was a key theme throughout the consultation responses. Energy Suppliers, in particular, noted the benefits to Consumers through a more consistent and expedient process, that will enable a better setting of Consumer expectations. This in turn would increase Consumer confidence in the market, whilst also providing cost savings due to the possible reduction in time spend on costly deemed contracts.

Citizens Advice highlighted that between August 2023 and August 2024, 17% of Non-Domestic cases that came through their Consumer Service were coded as “Non-Domestic contract issues”. Within this, one of the most common issues in this code concerned Consumers struggling to process Change of Occupier’s. The implementation of this Change Proposal could greatly assist in reducing the number of these cases through a clearer process, and increased

communication between Energy Suppliers and Consumers. Citizens Advice noted that the proposed solution would help to prevent many of the problems their clients (Consumers) face.

13.5 CASE FOR CHANGE

The majority of respondents agreed with the Code Manager's case for change and reiterated their position that this change should be made for the benefit of the Consumer. Those that did not agree with the case for change did so on the basis of believing the reporting requirements proposed were disproportionate and did not deliver any substantial benefit, positive impact or continuous efficiency. Those that did not agree with the case for change also raised concerns that SDEP is a system that they believed was not fit for purpose and one that would increase the risk of a poorer service for the Consumer. Two respondents provided detailed reviews of the Code Manager's case for change, that highlighted where they believe the Code Manager's assessment was incorrect. The Code Manager has reviewed these responses and have considered the points raised by the respondents.

13.6 IMPLEMENTATION DATE AND APPROACH

Many respondents disagreed with the June 2025 implementation date with respondents noting that they would need more time to make updates to systems due to the levels of Performance Assurance reporting. However, respondents noted that if the reporting requirements were to be reduced, then the lead time required by Parties for implementation would also be shortened. The Code Manager has also reviewed the Performance Assurance requirements, and these have been reduced. The Code Manager expects that the required lead time for Energy Suppliers will also now be reduced. Some respondents also noted wider-industry capacity concerns, including public holidays ahead of the implementation and existing industry programmes, such as MHHS. The Code Manager has factored in standard public holidays, and existing industry programmes, into the timeline for delivery. When weighed up with the Consumer detriment currently experienced as part of the CoO process, the Code Manager believes the proposed delivery timeline is the most suitable. The implementation date was also supported by Citizens Advice, as a Consumer Advocate group, who acknowledge the need to implement the change to reduce Consumer detriment.

Some respondents noted that they did not believe the Change Proposal should be implemented with the interim SDEP solution. Instead, the implementation date should be post-MHHS once new process type screens can be introduced, removing the need for the interim SDEP solution. The Code Manager, however, disagrees with this suggestion and acknowledges that the R0155 working group, the proposer and Ofgem all agreed that R0155 could not be paused until the full SDEP solution could be implemented due to the ongoing risk of Consumer detriment.

13.7 SDEP

The majority of respondents were supporting of having a platform where Energy Suppliers can securely share documents, however concerns were raised around SDEP being the approach taken under this Change Proposal. The key themes raised amongst responses concerned mandating the use of SDEP due to SDEP's limited capabilities, the existing experiences Energy

Suppliers have and the challenges they face, and the interim SDEP solution using PT0056 and PT0067.

Previously, The Code Manager added wording to the Schedule to allow Energy Suppliers the freedom to use SDEP or an alternative they agreed bilaterally. In their impact assessment responses Energy Suppliers provided clear feedback that they did not want the option to use another method. This was removed from the legal drafting and issued in the consultation. No comments were received. Within the consultation responses there were now mixed views on mandating SDEP. Those in favour argued that it would improve efficiency with communication and would create a consistent approach for how Energy Suppliers interact. Those who did not agree with the decision to mandate the use of SDEP noted that Non-Domestic Gas Suppliers do not currently use SDEP, and that SDEP is currently not fit for purpose, and is deemed unreliable by some Energy Suppliers, partly due to the lack of reporting functionality.

Respondents raised concerns around the use of the PT0056 and PT0067 screens as an interim solution until specific process type screens can be created for the Non-Domestic Change of Occupier process. Respondents stated that this approach would lead to confusion and inconsistency and could create legacy issues once the enduring solution is implemented. Respondents also recommended that the Change Proposal should be implemented without the use of SDEP until the new process types can be created. However, as previously noted, the R0155 working group, the proposer, and Ofgem, all agreed that the R0155 could not be implemented without an SDEP solution, and that the Change Proposal could also not be paused until the full SDEP solution could be implemented, due to the ongoing risk of Consumer detriment.

Whilst some respondents noted that the PT0056 and PT0067 screens and/or SDEP should not be used in the R0155 solution, to date, no alternatives have been provided including as part of the impact assessment or consultation. As such, the Code Manager will include this temporary solution, as the only viable, secure option as part of the R0155 solution until new process types and escalation screens can be developed.

13.8 PERFORMANCE ASSURANCE REQUIREMENTS

The majority of respondents were against the Performance Assurance requirements and proposed during the consultation. Those that expressed their opposition to the change throughout the remainder of the consultation, largely did so based upon the reporting requirements. Respondents noted that they disagreed with the requirement for MPxN line level data, and that reporting proposals were onerous, costly and disproportionate to the size of the Change Proposal and the Consumer benefits it is seeking to bring. Energy Suppliers noted that the system costs would be substantial, and the time required to build the systems to be able to complete the reports would not be achievable within the proposed lead time for a June 2025 implementation. Respondents asked the Code Manager to thoroughly reconsider the Performance Assurance requirements, included a request to use aggregated, not MPxN level, data. Respondents also noted the reporting Ofgem are currently developing ahead of their Request for Information and asked the Code Manager to consider aligning the reporting requirements for R0155 with the Ofgem report.

The Code Manager has revised the Performance Assurance reporting requirements for this change following the consultation. The new proposal was presented to the Performance Assurance Board on 26 November 2024. The details for the revised reporting requirements can be found in Section 8 of this Change Report. One respondent noted this revised approach in their response and stated that the new proposal represents a more pragmatic solution.

The Code Manager notes that the Performance Assurance reporting requirements have been scaled back, following feedback provided in the Party impact assessment. The new reports will partly be based on the new Ofgem CoO requirements, once these are consulted on and finalised.

14 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

DOCUMENT	SECTION	AMENDMENT	REASON
Non-Domestic Change of Occupier Schedule	Paragraph 2.2	The Energy Supplier shall, within 10 Working Days of receiving notification ~~receipt of the requested evidence~~ of a Change of Occupier (or, upon receipt of requested information including where additional information has been requested, the receipt of the additional requested information):	Amendment made after a legal review to ensure correct legal terminology and processes are listed. Further clarity provided around the 10 Working Days being from the point of receipt of requested evidence, including when additional requested information is received.
Non-Domestic Change of Occupier Schedule	Paragraph 2.6	It is acknowledged that ~~where there has been~~ a Change of Occupier may cause the Energy Contract between the outgoing Consumer and the Energy Supplier to end, but this will depend upon the terms of the Energy Contract. If the Energy Contract ends, a deemed supply contract with the incoming Consumer will apply under the Electricity Act and/or the Gas Act (as applicable). The consequences in respect of the arrangements between the Energy Supplier and the outgoing Consumer will be governed by ~~the~~ their Energy ~~Supply~~ Contract.	After a legal review, this amendment has been made to provide further context to the Schedule to prevent some noted confusion by REC Parties over an Energy Supplier's rights on a Change of Occupier for Non-Domestic Premises.
Non-Domestic Change of Occupier Schedule	Paragraph 3.4	If a Losing Supplier receives evidence of a Change of Occupier from the Gaining Supplier pursuant to Paragraph 3.3, then the Losing Supplier shall, within 10 Working Days of such receipt: (a) determine that there has been a Change of Occupier, and notify the Gaining Supplier in accordance with Paragraph 3.6 (in which case the Losing Supplier ~~and~~ will not continue to raise an Objection to the ~~a~~ Switch);	Amendments made as part of a legal review by REC Legal Advisors. Paragraph 3.3 had already referred to the Gaining Supplier providing the evidence. A further clarification has been provided in paragraph 3.3, following a consultation response, to ensure further clarity, including noting the actions of the Losing Supplier.

		(b) determine that there has not been a Change of Occupier, and notify the Gaining Supplier in accordance with Paragraph 3.6 (in which case the Losing Supplier ~~and~~ may continue to raise an Objection to the ~~a~~ Switch ~~as set out in Condition 14 of the Energy Supply Licences~~);or (c) (d) only if the Losing Supplier does not have sufficient information to make such a determination, request additional information from the Gaining Supplier in accordance with Paragraph 3.6 ((in which case the Losing Supplier may continue to raise an Objection to the Switch ~~as set out in Condition 14 of the Energy Supply Licences~~).	
Non-Domestic Change of Occupier Schedule	Paragraph 3.9	For clarity, whether or not a Losing Supplier can validly raise an Objection depends upon the terms of the Energy Contract between the Losing Supplier and the Consumer, as set out in Condition 14 of the Energy Supply Licences. The Energy Supply Licences do not require Energy Contracts for Non-Domestic Premises to terminate on a Change of Occupier. If the Energy Contract has not terminated, the Losing Supplier may be able to validly raise an Objection under Condition 14 of the Energy Supply Licences.	After a legal review, this amendment has been made to provide further context to the Schedule to prevent some confusion noted by REC Parties over an Energy Supplier's rights on a Change of Occupier for Non-Domestic Premises.
Non-Domestic Change of Occupier Schedule	Appendix 1 – Example Evidence of a Change of Occupier	Typography amendments to the summary of Lease, Lease/Tenancy Termination, and Title Deeds/Land Registry.	Typography changes to provide correct legal terminology and clarifications as part of a legal review by REC Legal Advisors and industry consultation responses.
Schedule 23 – Registration Services	Paragraph 6.3	"~~Schedule X –~~ the Non-Domestic Change of Occupier Schedule"	Typography change to align with REC standards and style as part of a legal review. REC Schedules are not supposed to have numbers, so the cross-reference to the new schedule in paragraph 6.3 should just refer to "the Non-Domestic Change of Occupier Schedule"

Change Report	Case for Change	Description and Justification to the REC Objectives have been reviewed with further justifications provided and clarity included.	The Code Manager received feedback as part of the R0155 consultation asking for more clarity and received some responses that were against the Case for Change. The Code Manager promised REC Parties that this would be reviewed as part of the Change Report (for Final Recommendation). The Code Manager also received consultation responses provided data and benefits that provided further clarifications. These have now been included in the Case for Change.
Change Report	Proposed Solution (8.5 Use of SDEP)	Further detail provided on the SDEP interim solution for R0155, including detailing the use of PT0056 and PT0067 screens between Energy Suppliers to share documents.	Following consultation, no alternative SDEP proposals have been suggested to the Code Manager or found by the Code Manager. Consequently, the Code Manager has proposed to proceed with the interim SDEP solution using the PT0056 and PT0067screens. The amendment confirms this and provides further details of the solution and the expected next steps.
Change Report	Proposed Solution (8.6 Performance Assurance Approach)	The Code Manager consulted with the Performance Assurance Board (PAB) setting out options for assuring this change. There was significant focus from the PAB on preventing any issues, and having data led monitoring of performance across the market. They requested two activities be included in the solution: 1. Assurance before implementation to gain confidence that Parties were ready to operate in line with the changes to the REC; and 2. Ongoing monitoring to identify outliers or anomalous behaviour, which the Code Manager would then follow up in detail. Further details on the methodology for this are included in the Performance Assurance Methodology and Techniques Document. The amendments to the Performance Assurance Approach have been detailed	The Code Manager consulted with the Performance Assurance Board (PAB) again on 26 November 2024 setting out options for assuring this change, including reflecting on responses from the Party impact assessment and industry consultation. Subsequently, the Code Manager amended the Performance Assurance approach.

		in the Change Report, and, as such, the Proposed Solution section of the Change Report has been updated to match.	
R0155 – Change of Occupier: Evidentiary Standards and Timescales - Guidance Document	N/A	Existing guidance reviewed and amended following receipt of suggested amendments and requests for further guidance points during the R0155 industry consultation.	Document updated after R0155 consultation, ready for R0155 Change Report (Final Recommendation).
Updates on the Performance Assurance of R0155 – Guidance Document	N/A	Existing guidance reviewed and updated following engagement with the Performance Assurance Board to update the Performance Assurance proposals. The guidance is based around the proposals detailed in section 8.6 of this Change Report.	Updated document for Change Report (Final Recommendation) because of the amendments made to the R0155 Performance Assurance approach.

15 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

No risks or issues have been identified at this stage.

15.1 ASSUMPTIONS

NUMBER	ASSUMPTION	NOTES	STATUS
R0155.A001	New Process Type SDEP screens for Non-Domestic Change of Occupiers, to be introduced post-implementation with an interim solution at the point of implementation.	The implementation of R0155 will be with an interim SDEP solution until new Process Types can be created. The assumption is that these new screens will not be created until the implementation of R0122 and post-MHHS, both of which will be after the implementation of R0155. The interim solution will see Energy Suppliers use the PT0056 and PT0067 screens.	Ongoing. The Code Manager is engaging with the SDEP Service Provider. Subsequent Change Proposal to be discussed at February 2025 Change Issues Group meeting.
R0155.A002	A subsequent Change Proposal to update the PARC to use Ofgem reporting for Non-Domestic Change of Occupiers.	As noted in section 8 of this Change Report, REC Performance Assurance intends to carry out further monitoring using data collected as part of, and following, the Ofgem reporting RFI. To include this in the PARC, a separate Change Proposal will have to be	Ongoing. A Separate Change Proposal will be raised after the outcome and conclusion of the

		raised after the conclusion and outcome of the RFI. The Code Manager assumes this Change Proposal will be raised to eventually include the Ofgem data as part of the PARC and monitoring approach for Change of Occupier's. However, as the Code Manager assumes this RFI will not be completed before the implementation of R0155, the need for a subsequent PARC Change Proposal will remain.	Ofgem reporting RFI. The Code Manager will engage with Ofgem to ensure an update can be provided, or the Change Proposal be raised, as soon as possible.
R0155.A003	Information Request Questions	The questions included in Section 8 of the Change Report and the Updates to Performance Assurance V2.0 guidance document, are assumed questions and are subject to change ensuing the issuing of the Ofgem reporting RFI and upon the status of R0155.A002.	Ongoing.

15.2 DEPENDENCIES

NUMBER	DEPENDENCY	NOTES	STATUS
R0155.D001	Parties and/or Service Providers to ensure the required reporting is available.	This is a dependency for Performance Assurance Requirements only.	Ongoing.
R0155.D002	Information Request Questions	The questions included in Section 8 of the Change Report and the Updates to Performance Assurance V2.0 guidance document, are dependent upon the outcome of the Ofgem reporting RFI (as noted in R0155.A003) and whether the separate PARC Change Proposal (as noted in R0155.A002) has been implemented before/with R0155.	Ongoing. In alignment with R0155.A002 and R0155.A003. The Code Manager will provide a further update after the receipt of the Authority Decision and update the R0155 – Updates on Performance Assurance Guidance Document where required.

16 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Non-Domestic Change of Occupier Schedule Schedule 23 – Registration Services Schedule 23 – Registration Services (Red-Lined)
GUIDANCE DOCUMENTS	R0155 – Non-Domestic Change of Occupier: Evidentiary Standards and Timescales Guidance Document V1.1 Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2.0
CONSOLIDATED IMPACT ASSESSMENT RESPONSES (NON-CONFIDENTIAL)	Link
CONSOLIDATED CONSULTATION RESPONSES (NON-CONFIDENTIAL)	Link
ANY OTHER DOCUMENTS / LINKS	Previous R0155 Change Proposal Plan Performance Assurance Methodology and Techniques Document

17 GLOSSARY

TERM	DEFINITION
Change Of Occupier (CoO)	means that the Consumer at a premises has changed (or is due to change).
Consumer	means any person supplied (or seeking a supply) of Energy at an RMP (whether or not that person also exports or is seeking to export electricity at an RMP).
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Gaining Supplier	means, in relation to a proposed Switch (or Switch), the Energy Supplier which is proposing to become the Registered Supplier at an RMP as a result of that proposed Switch (or which has become the Registered Supplier as a result of that Switch).
Losing Supplier	means, in relation to a proposed Switch (or Switch), the Energy Supplier which will cease to be the Registered Supplier at an RMP as a result of that proposed Switch (or which has ceased to be the Registered Supplier as a result of that Switch).
Meter Point X Number (MPxN)	means the collective description of the MPAN and MPRN when used together.
Non-Domestic Consumer	has the meaning given to 'Non-Domestic Customer' in the Energy Supply Licences.
Non-Domestic Premises	means a premises at which a supply of Energy is (or will be) taken wholly or mainly for non-domestic purposes, which is to be interpreted in accordance with the Energy Supply Licences.
Non-Domestic Supplier	means an Energy Supplier which is not authorised by its Energy Supply Licence to supply Domestic Premises
Objection	means a request from the Losing Supplier to block a Switch Request for reasons permitted under the relevant Energy Supply Licence.
Secure Data Exchange Portal (SDEP)	means the portal of that name which forms part of the Secure Data Exchange Service.
Switch	means a change to the Registered Supplier for an RMP.
Third Party Intermediary (TPI)	means a broker or introducer acting between Consumers and Energy Suppliers, including Price Comparison Websites.