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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0155 – CHANGE OF OCCUPIER: EVIDENTIARY STANDARDS AND TIMESCALES

On 05 November 2024 the Code Manager issued a consultation to industry to seek feedback on the Change Report for R0155.

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

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1. Questions on the Proposed Solution

Question 1:	1 Do you agree with the Code Manager's minded to position that this Change Proposal should be approved for implementation on 27 June 2025. If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	We do not believe that the change proposal should be approved based on the following concerns: • The list of documents that suppliers can draw from remains uncapped and from a non-exhaustive list. Further, the guidance document that has now been published alongside the revised Change Proposal includes a further set of documents that may be requested in addition to those listed within the Non-Domestic Change of Occupier Schedule. Examples of acceptable documents might include a lease agreement, business rates, or employer/public liability insurance, all with consistent start dates. However, requesting other types of documents often serves no practical purpose and leads to a process that is not uniform resulting in unnecessary delays and potential profiteering by suppliers. As has been noted throughout our engagement with Ofgem, the lack of control of specificity for the documents requested by suppliers as part of a change of tenancy request was one of the principle factors complicating and extending the process.	Thank you for your response The list and SLA 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 "one size fits all" solution for either the list 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. The new Schedule will be subject to the same rules and change process as the rest of the REC.

	• We are unclear why REC are placing the responsibility on the receiving supplier to vet the documents required as part of a change of tenancy request. This seems like unnecessary duplication as both the incumbent and receiving supplier should be working from the same document set. In addition, the receiving supplier is unlikely to know who the outgoing tenant is and therefore will have less to do to satisfy themselves that the request is authentic. • There is no clarity in either the guidance or the Non-Domestic Change of Occupier Schedule of the consequence for suppliers of non-compliance with the new scheme or their reporting obligations, nor any protections for customers against this. We feel that this requirement is vital in terms of achieving full transparency of the process to assist both suppliers and customers.	
British Gas (Energy Supplier)	We welcome the opportunity to be able to review and respond to a proposed solution for the non-domestic change of tenancy process. We acknowledge that across the industry, the change of occupier journey for non-domestic customers is inconsistent between suppliers, with varying documentation and evidential requests, timescales, and communications. Suppliers are also exposed to high levels of debt risk due to the incidence of fraud in the change of tenancy process. This can manifest through fraudulent or inconsistent evidence being provided, reducing suppliers ability to determine whether a change of tenancy has taken place.	Thank you for your response. Please further see the Code Manager comments in response to the questions on SDEP.

	Therefore, we are supportive of the minded to implementation date to ensure that the potential benefits this change delivers to both the industry and customers are realised in a timely manner. However, our concerns remain that this timeline does not account for the development and improvement needed to the SDEP platform to enable a solution that is fit for purpose. Our position is that whilst implementation should not be delayed for the aspects of the solution relating to using consistent evidential standards and timescales; the use of SDEP should not being included within scope until REC has concluded and delivered against R0122. This ensures that the core benefits of this proposal can be realised in a timely manner, without using a solution that is not fit for purpose. We have made further comments on the use of SDEP within section 3 of our response.	
Brook Green Supply Limited (Energy Supplier)	No. We agree with the implementation of the customer solution by 27 June 2025 however we disagree with regards to the proposed disaggregated reporting requirements as we feel that this is unduly onerous and outside the remit of RECCo. We would be happy to support further discussions as to the reporting requirements, and potentially support the reporting of aggregated data.	Thank you for your response. Please further see the Code Manager comments in response to the questions on the Performance Assurance Requirements.
Business Energy Direct (UK) Ltd (Third Party Intermediary)	No. Overall I don't believe the proposal goes far enough to protect the customers that are being exposed to deemed prices for an	Thank you for your response. The scope of this Change Proposal was to consider the evidentiary standards, and the type of

	extended period of time, the proposal allows suppliers an excessive and unnecessary amount of time to process a COO. No evidence has been provided to justify the 10 working days "time allowance" and whilst the proposal to allow suppliers 10 working days is better than having no timeframe at all, I believe this should be shorter to ensure that end users aren't exposed to the higher deemed prices for an extended period. If we take the current average non half hourly deemed standing charge of 6 selected suppliers, a typical customer would be exposed to a daily standing charge of 235.66p, (a low of 150p a day and high of 399p a day) this equates to £32.99 over the 2 weeks the proposal would permit. If we compare this to having an agreed contract of 35p per day standing charge (£55.86 high / £21.00 low) the cost would be just £4.90 (based on an 03/04 profiled customer). The problem with the proposal is that the end user has no control over what they are charged and there are no specific regulatory parameters for supplier to adhere to, and whilst we understand that price is beyond RECCo's influence, timeframes are within your control. The feedback and the consultation have failed to consider the external market conditions which have impacted the volume of COO suppliers have been dealing with, this may have influenced the 10 day lead time proposed.	evidence that can be provided to evidence a COO, and the timescales for Energy Suppliers to review evidence. The scope of this Change Proposal was not around the time to process a COO. If a Market Participant believes this should be changed, they can suggest this through the REC change process. The 10 working days was agreed upon following discussions and explorations of appropriate timescales of Energy Suppliers as part of the R0155 Working Group. The Party impact assessment showed wide support for this timescale. Post-implementation, the new Schedule and solution will be subject to the same rules and change process as the rest of the REC that both the Code Manager and Market Participants can engage in. As part of the R0155 working group, Energy Suppliers considered the required lead time and factored in internal and

	The number of COOs over the last 12/24 months have been higher than historical levels (and forecasted future levels). There are several reasons for this. • More legitimate COO's taking place (there has been an increased number of insolvencies during this period due to the economic climate) • More genuine COO's taking place as a result of companies looking to restructure their organisations due to the impact of the energy crisis. • More fraudulent activity (and more COO notifications received by suppliers), many customers looking to use the COO mechanism to end highly priced contracts that were agreed during the peak market period.	external conditions during their consideration.
Citizens Advice (Consumer Advocate)	Citizens Advice is supportive of the proposed solution and recommend that this change should be implemented. It is an important change to improve the experience of non-domestic consumers in the non-domestic energy supply market and to address issues identified in Ofgem's Non-domestic market review. Citizens Advice regularly sees cases from non domestic consumers struggling with the change of tenancy process. Over the past year (August 2023 to August 2024), 17% of non-domestic cases that came through our Consumer Service were coded as 'non-domestic contract issues' cases. This code encompasses a broad range of issues, but one of the most	Thank you for your response and your detailed assessment of the change. The Code Manager is pleased to hear that as a Consumer Advocate group, you believe the change will bring positive benefits to consumers in multiple areas of the COO process.

	common issues within this code is consumers struggling to process change of tenancies. The cases we see related to change of tenancies often involve a few key issues. Customers may struggle to process a change of tenancy within an acceptable timeframe with their energy supplier. This can be due to inconsistent requests from suppliers for evidence that a change of occupier has occurred. Consumers may also not know the outcome of a change of occupier attempt for a lengthy period of time. This can lead to consumers remaining on deemed rates for an extended period of time, which can lead to the build up of debt for a consumer. Customers who struggle to process a change of tenancy with their supplier may also find themselves pursued by their supplier for debt which belongs to a previous occupant. In the most serious cases, incoming consumers have found themselves disconnected from their energy supply as a result of failure to repay debt which does not belong to them. The proposed solution would help to prevent many of the problems our small business clients face. A centralised list of evidence for suppliers, brokers, and consumers to refer to will cut down on the issues faced by the provision of inadequate information. It will be clearly outlined which forms of evidence are considered acceptable in order to process change of occupier requests, and will cut down on the time spent for a consumer going back and forth with their supplier. It will also help to	

	increase much needed consistency for non-domestic consumers in the non-domestic supply market. In addition, the 10 working-day SLA for suppliers to process evidence in support of a change of occupancy (with or without a switch) and either communicate with the customer or reach a decision will reduce issues faced by consumers remaining on deemed contract rates, or struggling with waiting for long periods of time for a decision. Finally, the introduction of SLAs and an attached performance assurance process means that there is less chance of consumers being pursued for debt which does not belong to them, as there will be centralised methods for initiating a change of tenancy request and clear guidelines which suppliers have to follow in order to process this within the 10-working day timeframe. It will also encourage clearer communication between supplier and consumer, which would help reduce the risk of detriment to business consumers and improve consumer confidence in the sector. The centralised and self-reporting requirements are an important step in ensuring that non-domestic suppliers will be compliant with the change and will provide important opportunities to identify whether the intent of this change is delivering the intended benefits to non-domestic customers, and whether any further issues need to be addressed. This should help to drive up standards and ensure better practice becomes commonplace within the industry.	

Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	We do not agree that this Change Proposal should be approved for implementation at this stage. There are two aspects of the proposed approach which we believe require further development for us to support the implementation of R0155: • **When a CoO takes place at the same as a change of supplier, we do not agree that it is necessary to mandate suppliers to use SDEP to facilitate the sharing of evidence.** SDEP has not proven itself to be a reliable platform for suppliers and many non-domestic suppliers are poor at monitoring and responding to existing SDEP cases, contributing to a marked increase in Contract Manager escalations. An easier approach would be for the gaining supplier to instruct its customer to provide the same evidence directly to the losing supplier to ensure the CoO can be processed within 10 working days. • **We do not agree that it is necessary for suppliers to provide MPxN level data to monitor ongoing compliance as proposed through PARC changes.** It would be more reasonable to request average time(s) taken to process requests for all CoOs, meaning suppliers can provide non-MPxN level data. We raised these concerns in our earlier Party Impact Assessment Response, and we are not satisfied that they have been suitably addressed. Specifically, the latest Change Report (v.1.1) indicates that the Code Manager consulted with the Performance Assurance Board (PAB) on 30 July 2024 on options for assuring this change, suggesting that feedback received subsequently (i.e.	Thank you for your response. SDEP is the REC's secure means of sharing data. Alternative methods were discussed as part of the R0155 working group, but no suitable alternative has been found. Further, the Code Manager added wording to the Schedule to allow Energy Suppliers the freedom to use SDEP or an alternative they agreed bilaterally (that could have potentially included the Gaining Supplier providing an instruction to the Consumer). In the 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. REC Performance Assurance have provided further details, including the justification of the approach(es), in the document titled 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'. This

	from the consultation in August-September) has not been presented to PAB.	updated approach was presented to the Performance Assurance Board at their meeting on 26 November 2024.
Ecotricity (Energy Supplier)	Ecotricity believes that this is a reasonable time frame to ensure any adaptations that maybe required are completed by all parties.	Thank you for your response.
EDF (Energy Supplier)	Yes. EDF agrees this is a reasonable timeframe to implement the changes as set out in this consultation	Thank you for your response.
ENGIE (Energy Supplier)	No. We are, as we stated in our impact assessment response, generally supportive of the principle of moving to an agreed SLA for consideration of evidence of Change of Occupier (CoO) but do not believe that 6 months is an adequate timescale for industry to make this transition. We also feel that the proposals do not sufficiently take into account complex cases where there may be significant commercial or contractual implications for parties and is it simply not possible to resolve COTs within the stipulated timescale. Moving to a code-mandated timescale from current operational practice will require a review of resources, processes and systems, together with staff training and potentially discussions with TPI partners, and also time for these revised processes to bed in in order to ensure that the mandated SLAs can be met. We do not believe this is achievable in 6 months. In addition, the current proposal does not include a robust communications proposal for suppliers to communicate on CoOs,	Thank you for your response. The Code Manager has weighed up the delivery timelines with the continued Consumer detriment should the lead time for implementation be any longer than what has been proposed. The proposed legal text does allow for complex cases as long as you are communicating the process to the Consumer. The Code Manager has also reviewed the Performance Assurance requirements, and these have been reduced. Energy Suppliers noted in their impact assessment responses, if the reporting requirements were reduced, the required lead time for Energy Suppliers would also be reduced. The new reports will also

	with no SDEP development to support this being in place at go live. We also do not support the proposed performance assurance reporting regime based on suppliers' own reporting, as this increases the regulatory and cost burden on suppliers and potentially undermines the consistency of the reporting. We do not believe that a reporting regime is necessary for the implementation of this change and that the need for this should be considered at a later date once the SLAs and evidentiary standards have been operating for a period.	partly be based on the new Ofgem COO requirements, once these are consulted on and finalised. SDEP is the REC's, robust and secure means of sharing data. The proposed SDEP solution was discussed at the Working Group to establish if another tool could be used, for example Huddle, and the Working Group decided SDEP should be used. The SDEP screens were selected following careful consideration as they had the least traffic of all SDEP screens. The Code Manager had added wording to the Schedule to allow Energy Suppliers the freedom to use SDEP or an alternative they agreed bilaterally. However, 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. For the proposed Performance Assurance performance, REC Performance Assurance have provided further details, including the justification of the approach(es), in the document titled

		'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'.
ICoSS (Trade Body)	No. The substantial reporting requirements cannot be delivered in time. Members have indicated that they do not currently collate this information in the form prescribed by the solution. To do so therefore represents a significant set of system changes to be implemented at relatively short notice.	Thank you for your response. The Code Manager has noted your points on the time needed for system changes as part of the reporting requirements. The reporting requirements will be amended to reduce the required system changes and reduce the required time Parties need to implement. Please further see the Code Manager comments on the Performance Assurance Requirements questions.
ScottishPower Energy Retail Limited (Energy Supplier)	We remain concerned that this proposal marks a departure from Ofgem's original request to RECCo in relation to non-domestic Change of Tenancy (referred to here as Change of Occupier). Across the documents published under its Non-Domestic Market Review, Ofgem set a clear and straightforward mandate: to establish a list of evidence options for non-domestic Change of Tenancy. For instance, in its Non-domestic market review: decision of 5 April 2024, Ofgem underlined its request for "a consistent set of documents to demonstrate a valid Change of Tenancy". By contrast, this proposal introduces a new REC schedule with service-level agreements (SLAs) on energy	This REC Change Proposal, whilst raised by RECCo following the Ofgem review, is separate to Ofgem's original request. However, Ofgem have been engaged, and involved, throughout the process, including being present at the R0155 Working Group. This is also an Authority-Determined Change Proposal, so the final decision will be made by Ofgem in their role as the Authority.

	suppliers in relation to non-domestic Change of Tenancy and non-domestic Change of Supplier and a “non-exhaustive” list of evidence options. In parallel, a “non-binding” guidance document sets out a competing list of evidence options. We believe that, in line with Ofgem’s mandate, any solution should deliver a single, consistent list of evidence options for non-domestic Change of Tenancy. We are not persuaded that the architecture which this proposal would introduce under the REC, including the multiple evidence lists, SLAs and process codification, and Performance Assurance (PA) reporting, is warranted in the circumstances or would bring sufficient benefits to consumers to justify its establishment. Most of the concerns that we raised in our response to the party impact assessment remain. By contrast, we do believe that a single list of evidence options, alone, would be beneficial for consumers. In our view, consideration of more prescriptive measures should only be given after attempting simpler ones (ie a single evidence list). We do not believe that this proposal, in its current form, should be approved.	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. The Code Manager remains willing to assist REC Parties wherever possible with preparing for the implementation of this Change Proposal. The list and SLA 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 “one size fits all”/single evidence solution for either the list or Energy

		Suppliers' validation steps that would be suitable. The Code Manager has addressed the proposal of a single list in detail during the Working Group, following the impact assessment, and amongst the comments provided to consultation responses.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Since our response to the IA and having made additional checks as to whether system changes would be required, we would request that this change be delayed until, at the earliest November 2025. With any changes which have a system impact, we request at least 6 months lead time from the date of decision. In our response to the IA, we had not identified any specific systems changes however, we have now identified that with the proposed PARC updates, we will need to make changes to be able to report on CoO's. We would also request that this change is not implemented until the SDEP PT's can be developed, as for our response to Q3.2, we do not believe a PT should be repurposed. Our view, is that this change can be implemented once the current MHHS code freeze is removed, although we note that the programme has advised that 'changes will be frozen "until after go-live and, in some cases, until after Migration completion".' We do not foresee that this change will need to be held until migration completes as it has no impact on the MHHS design, therefore believe this can	Thank you for your response. The Code Manager has proposed the June 2025 implementation due to urgency to resolve the Consumer detriment currently experienced as part of the COO process. The Code Manager has reviewed the PARC, and performance assurance requirements. These have been reduced and should result in a shorter required lead time for Energy Suppliers. SDEP is the REC's secure means of sharing data. The solution was discussed at the Working Group to establish if another tool could be used, for example Huddle, and the Working Group decided SDEP should be used. The SDEP screens were selected following careful

	be implemented after the M11 milestone, which is proposed to move to 10/09/25 if Ofgem approve the delay.	consideration as they had the least traffic of all SDEP screens. The 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 Please see further Code Manager comments on the use of SDEP for the responses to questions in Section 2 – Questions on SDEP.

Question 2:	2 Do you agree with the Code Manger's Case for Change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	Yes.	Thank you for your response.
British Gas (Energy Supplier)	We are in broad agreement with the code managers assessment of the case for change listed within the change report. We have an existing robust document validation process in place, which is in alignment with the proposed set of evidentiary documents. Therefore, the introduction of a non-exhaustive list will have a limited impact on our process overall. However, aligning a documentary standard across the non-domestic industry is likely to drive consistency and ensure an easily understood process by customers. Regarding mandating fixed SLAs for the review of documentation; this SLA aligns to existing process timescales that exist within British Gas Business today. However, we foresee that this change will provide a benefit across both our business and the industry through creating greater visibility of documentation, aligning SLAs and reducing the risk of fraudulent change of tenancies.	Thank you for your response. Please further see the Code Manager comments in response to the questions on SDEP, in particular the comments for your response to section 2 (questions on SDEP), question 1.

	However, our concern remains over utilising SDEP within this change. As the code manager notes within the change report, ‘‘Many parties have noted their concerns around not only SDEP… R0155 seeks to improve the availability of SDEP screens to ensure this central system is visibly improved for users and acts as an efficient way of sharing data and communicating with other REC Parties.’’ As previously stated, the use of SDEP risks undermining the positive outcomes that this change aims to deliver. Both SDEP screens (PT0056 and PT0057) are currently active with multiple industry escalations within them. Given the short timescales required to ensure this change delivers the benefits needed, using SDEP ultimately risks undermining that outcome. Our position remains that SDEP needs significant development and investment before it is fit for purpose.	
Brook Green Supply Limited (Energy Supplier)	No. We disagree based on the unduly onerous disaggregated reporting requirements proposed by the Code Manager as this is disproportionate and represents unnecessary and additional cost to suppliers without delivering any substantial benefit.	Thank you for your response. The Code Manager will reassess the reporting requirements to ensure substantial benefits can be provided. Please further see the Code Manager comments in response to the Performance Assurance Requirements questions.
Business Energy Direct (UK) Ltd (Third Party Intermediary)	Yes	Thank you for your response.

Citizens Advice (Consumer Advocate)	Yes.	Thank you for your response.
Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	Yes. The development of a defined list of evidence and process SLAs are pragmatic steps that will ensure CoOs are processed more consistently across the industry.	Thank you for your response.
Ecotricity (Energy Supplier)	Ecotricity as a business, are committed to prioritising the customer experience through all interactions and ensuring a smooth transition through the Change of Occupier process. We fully support the introduction of additional guidance to promote consistency across the industry and make the Change of occupier process more efficient.	Thank you for your response.
EDF (Energy Supplier)	EDF notes the original impetus for this change was Ofgem's Non-domestic market review, whereby Ofgem instructed REC to undertake this process. We further note that the underlying detriment that this change seeks to address, i.e. delays and confusion for non-domestic customers interacting with suppliers' Chang of Occupier evidentiary processes, was not quantified by the review, or subsequently by this change. Rather, Ofgem initiated this work based on reports from consumer bodies.	Thank you for your response. The Code Manager will review the Case for Change against the REC Objectives as part of the Final Determination of this REC Change, taking into consideration the points you have raised. Where appropriate, the Case for Change will be updated in the Change Report (Final Recommendation) and/or the Code Manager will provide further clarity. For further comments on the use of SDEP and the Performance Assurance

	That said, we do not dispute that the introduction of the proposed SLAs, or the supporting evidentiary list could improve customer experiences. We have set out our views on the Case for Change provided by REC below: Objective: *To ensure the REC operates and evolves in a manner that facilitates the achievement of its mission statement*. We have no comments or objections regarding the associated justification for this objective. Objective: *To ensure customers interests and data is protected in the operation of the REC.* EDF does not agree with the justification provided for this objective. *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* • This description does not accurately reflect common industry practices, nor the statutory purpose of deemed contracts. The fundamental reason for the reliance on CoO evidence is to prevent fraud. It is in suppliers and consumers' interest to ensure CoO requests are accurately	requirements, please see the Code Manager comments in response to the questions on SDEP section, and the questions on Performance Assurance section.

	processed. The risk identified by Ofgem was that this takes too long in some cases, and consumers could benefit from more consistent treatment. While we agree the change may mitigate this issue, the case for change wording does not reflect this appropriately. • The descriptions of deemed contracts is not accurate. Suppliers are required by the Electricity and Gas Acts to supply the occupier of a premises under a deemed contract, where no formal contract has been agreed. • Deemed contracts are not 'long-lasting' they are 'evergreen', as they do not have a fixed end date. Customers are able to move to a new contract, or switch without a supplier objection. They only apply to a period not covered by an agreed contract. • We note that the pricing of deemed contracts is controlled by the supply licence conditions 7.3 and 7.4 and cannot be unduly onerous. Ofgem's review included specific focus on deemed contracts in reference to these SLCs, and produced guidance to support compliance with the same. *… and the Consumer's data from these documents are fairly treated, as well as securely shared amongst Energy Supplier's through the use of SDEP*. • We do not agree the proposed process achieves this justification. In particular, we note that the 'interim' solution proposes to use the 'Duplicate Meter Points General Query' transactions in SDEP until specific transactions can be created for this process. • By doing so, REC increases the processing of consumer data (which depending upon the evidence provided, may include sensitive information) and exposing this data to	

	supplier employees (i.e. metering advisors) who already use these transactions for their relevant purpose. • Additionally, we note that the performance assurance requirements provided alongside this consultation require suppliers to provide unnecessary meterpoint level data for performance assurance reporting. This further exposes consumer data to additional processing (we have provided additional specific comments on reporting in our subsequent answers). • We note the status quo does not provide for the mandatory exchange of CoO evidence between suppliers, as such, the change inherently elevates this risk by mandating this exchange of consumer data, and new processing. It further exacerbates the risk by utilising a makeshift exchange mechanism via the pre-existing transactions the interim solution proposed. Objective: *To drive continuous improvements and efficiencies in the operation of the REC and the central systems and communication infrastructures it governs*. • As we note above, suppliers do not currently exchange consumer data outside existing industry processes, or legitimate commercial arrangements, and specifically not in the context of CoO evidence (insofar as we are aware). So the justification of preventing bilateral exchanges via non-sanctioned methods is moot. Further, REC is proposing mandating that suppliers exchange this consumer data as part of the change. Ipso facto the risk is created by the change, rather than ameliorated by it (and the proposed	

	SDEP process only mitigates this risk, and insufficiently for the interim solution). *R0155 seeks to improve the availability of SDEP screens to ensure this central system is visibly improved for users and acts as an efficient way of sharing data and communicating with other REC Parties.* • The proposed interim solution stands in opposition to this statement, as the current functionality does not support the transaction, and does not currently support appropriate transparency for REC monitoring. • We note CP R0122 is already underway to address the functional limitations of SDEP. REC's priority should be focusing on the efficient and timely deployment of these proposed improvements, rather than creating makeshift workarounds for processes and reporting which could elevate consumer risk and increase supplier development and administrative burdens. *R0155 ensures efficient and appropriate use of the central systems and communication infrastructure in place under the REC*. • The proposed deployment of the makeshift interim solution via SDEP is inefficient and less secure. Please note, with regard to Assumption R0155.A001, while EDF supports the creation of dedicated transaction process types for this workstream (without prejudice to the MHHS Code Freeze).	

	We do not support the interim solution proposed, for the reasons set out above.	
ENGIE (Energy Supplier)	In principle, yes. We agree that there is a need to standardise CoO evidentiary processes and improve service levels and expectations for consumers but this case for change must be supported by a robust implementation approach.	Thank you for your response.
ICoSS (Trade Body)	No. We disagree with the assessment of that this change has a positive impact on the last objective for continuous efficiencies as the disproportionate and onerous reporting requirements will represent an unnecessary and significant cost to suppliers and have a significant negative impact.	Thank you for your response. The Code Manager has reviewed the reporting requirements to reduce the impacts on suppliers. Please further see the Code Manager comments in response to the Performance Assurance Requirements questions.
ScottishPower Energy Retail Limited (Energy Supplier)	We support the consideration of suitable measures to ensure that non-domestic Changes of Tenancy work effectively for consumers and that legitimate Changes of Tenancy are processed in good time, taking into the challenges that can arise (such as when a supplier is notified of a “backdated” Change of Tenancy, with a retrospective change that can stretch back months). As we noted in our response to the party impact assessment and elsewhere, we are supportive of the principle of bringing more consistency across the industry to the form and options of evidence requested by suppliers from nondomestic consumers for prospective Changes of Tenancy. As set out in our response to Question 1, however, we do not believe that this	Thank you for your response. Please further see the Code Manager comments in Question 1.

	proposal, in its current multifaceted structure, materially improves the core point of consistency of evidence options. Instead, we believe that this core point would be diluted by the unnecessary architecture proposed to be constructed in and around the Code. In that context, we consider it important to recognise that this proposal would not change the fundamentals of a Change of Tenancy or a Change of Supplier. Codification (or, indeed, partial codification) of processes and practice within the industry does not inherently produce particular change or benefits. We believe that any expectations on the impact of this proposal, were it to be adopted, should be realistic, considering that it would not deliver the original intention of sufficiently greater consistency of evidence options and would instead create structures which may not bring benefits to consumers. While we appreciate the intent of the Code Manager's Case for Change, we are concerned that some aspects of it are problematic. On Point 1, the Code Manager states that the proposal would introduce "agreed evidentiary standards and timescales". As we have set out in this response, our view is that this proposal, in its current form, does not set out particularly clear evidentiary standards. We find the suggestion that the proposed PA reporting is intended to "ensure that Energy Suppliers are held to account" is not in keeping with the spirit of the Code. The purpose of performance assurance is to establish that industry parties adhere to their relevant obligations, so that the industry works well. On Point 2, the Code Manager states that current requests from suppliers for CoT evidence affect the "data	Thank you for your response. The Code Manager will review the Case for Change ahead of the publication of the Change Report (Final Recommendation).

	protection" of consumers and that the proposal would ensure that "[consumers'] data from these documents are fairly treated". While we agree that data protection is essential, we do not understand the logic behind these claims. On Point 3, the Code Manager states that the proposal "seeks to improve the availability of SDEP screens to ensure that this central system is visibly improved for users and acts as an efficient way of sharing data and communicating with other REC Parties." We are not aware of this proposal "improving" the availability of SDEP. We note that, under this proposal, suppliers would be asked to make use of an unrelated SDEP process type for an indefinite period as part of the change, as modifications to SDEP cannot be made during the MHHS Code Freeze. We would not consider such an outcome, however accurate the rationale, to be an improvement.	Please further see the Code Manager comments in response to the Questions on SDEP in Section 2.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Yes, however we do not agree with the change in its entirety. There are some elements that we believe go above and beyond the remit of REC and do not believe that these are required, as we have advised in response to other questions.	Thank you for your response.

Question 3:	3 Do you agree with the proposed legal text and the introduction of a new Non-Domestic Change of Occupier REC Schedule? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	We welcome a more robust and uniform approach to the change of tenancy/occupier process and which we believe that the current draft schedule is close to achieving. However, we remain concerned with some elements of the proposed schedule. Whilst we are pleased with the 10-day SLA on suppliers to review and process a request, subject to approval, we are concerned that there is no detail on the consequence for suppliers who do not comply with this timescale. Based on the experiences reported to us by our members, we are greatly concerned for the impact of delays to the change of tenancy process which can leave customers on expensive deemed rates for extended periods. We believe that further measures are required to ensure that customers are not placed in this position because of supplier delays or non-compliance and in instances where the change of tenancy request has not been completed following the 10-day period, suppliers should offer contractual rather than deemed rates. Introducing fair market rates, rather than defaulting to deemed or out-of-contract rates after the 10-day period, would deter suppliers from prolonging the process. Since suppliers cannot invoice the correct customer until the change of tenancy is completed, this approach would incentivise them to act promptly.	Thank you for your response. The Code Manager understands the concerns you raise around consequences for Energy Suppliers who do not comply with the timescales. The change solution includes reporting requirements which will feed into our Performance Assurance process. We will monitor Energy Supplier performance as part of the current process, and where we note Energy Suppliers are not meeting their REC requirements, Performance Assurance Techniques (PATs) will be applied to drive improvement in their performance. We recognise this as a key area which can lead to unfavourable outcomes for the Consumer and therefore it remains a priority for the REC Performance Assurance Board (PAB) to monitor. On non-compliance, the REC disputes process is also available and can be used as a method to flag any non-compliance, including related to R0155.

	In addition to this and with respect of the relationship between the incumbent and receiving suppliers, we believe that it creates unnecessary duplication to place the responsibility on the receiving supplier to vet the documents required to action the request. Based on the different extent of knowledge of the customer by new and existing suppliers and TPIs, we would suggest that that it is the incumbent supplier which solely deals with the customer, or TPI where there is one, in reviewing the Change of tenancy and obtaining required documents. Finally, whilst the proposed approach does make an attempt to introduce further consistency to the document types that can be requested as part of a Change of Tenancy request, we remain concerned that this list remains non-exhaustive and is uncapped. The new guidance published alongside the revised Schedule supports suppliers to select from a further range of documents. Examples might include a lease agreement, business rates, or employer/public liability insurance, all with consistent start dates. However, requesting other types of documents often serves no practical purpose and leads to a process that is not uniform, resulting in unnecessary delays and potential profiteering by suppliers. As has been noted throughout our engagement with Ofgem, the lack of any control of specificity for the documents requested by suppliers as part of a change of tenancy request was one of the principal factors involved in complicating and extending the process.	The COO process with a switch will only be triggered if the incumbent supplier objects. If they have been informed in advance the process is not required. It was clear throughout discussions at the Working Group that the incumbent supplier should be informed directly by the Consumer or their TPI. Please see the Code Manager comments in response to Question 1 on the list being non-exhaustive. Following the impact assessment, the Code Manager engaged with REC Legal Advisors around the possibility of placing a cap on the number of documents an Energy Supplier could request. Following this engagement, it was deemed that this would be unsuitable as part of this Change Proposal.
British Gas (Energy Supplier)	We have no comments relating to the proposed legal text.	Thank you for your response.

Brook Green Supply Limited (Energy Supplier)	Yes	Thank you for your response.
Business Energy Direct (UK) Ltd (Third Party Intermediary)	I agree with some of the principals of the proposed legal text, but as I have explained previously, I don't think it goes far enough to protect consumers.	Thank you for your response.
Citizens Advice (Consumer Advocate)	No response.	Thank you for your response.
Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	We agree that it is logical to introduce a new REC schedule, and we have no comments on the proposed legal text.	Thank you for your response.
Ecotricity (Energy Supplier)	As the legal test and a new REC schedule provides a concise list of acceptable documents, we fully support the development of a Schedule to support the industry to adopting a smooth process for all change of occupier accounts. NOTE: There are a number of challenges for suppliers which can arise through the processing of change of occupier accounts, particularly where information regarding the change of occupier is provided at a much later date. In these circumstances multiple change of occupiers could have occurred which we are unaware of - this raises several concerns, especially where a customer is a micro business, adding to further complications from a billing and potentially a back billing perspective.	Thank you for your response.
EDF (Energy Supplier)	Yes. EDF agrees with introduction of the new schedule as drafted in version 0.2.	Thank you for your response.

	We do not support the position of the performance assurance review and reporting requirements, as set out alongside this consultation. However, we note REC has subsequently brought a revised approach to performance assurance to the PAB (25/11) - RECPAB_24_1126_01. This new proposal represents a more pragmatic solution. However, more detail is required to support an informed decision.	Further comments on the new proposal for the Performance Assurance requirements can be found in the Code Manager comments for the Questions on Performance Assurance Requirements. The Code Manager will also provide more detail in the subsequent Change Report (Final Recommendation).
ENGIE (Energy Supplier)	We agree that a new schedule to the REC is the best way to capture the changes in Code and that the legal text reflects the approaches to evidentiary standard and service levels outlined in the proposal. As noted above, however, there are significant areas of the proposal which we do not support.	Thank you for your response.
ICoSS (Trade Body)	We have not reviewed the legal text.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	We welcome the select changes made to the draft legal text following the party impact assessment. At the same time, we have set out a series of proposed amendments to the draft legal text in the table below to ensure that it is as consistent, clear and effective as possible, should this proposal ultimately be progressed, for the reasons set out in our response to the party impact assessment. **The Code Manager is unable to paste the entire table provided by ScottishPower without corrupting the document, but it has been received and reviewed. Some key notes and comments have been pasted below although the formatting may have changed as a result.**	Thank you for your response. The Code Manager will review these suggested amendments with the assistance of REC Legal Advisors prior to the final legal text being published and make the changes should they be required.

		Schedule	**ScottishPower Proposal**	This is stylistic – either works legally. No change needed. As per the Interpretation Schedule, references to Paragraphs are to the paragraphs of the schedule in which the reference occurs, unless otherwise stated. The guidance document must be referred to in the legal text to clarify its status. This is stylistic. Therefore, the Code Manager has not made the change as it would not change anything legally. The proposed text would not reflect the intent of the clauses in the REC Schedule. Therefore, the change has not been made.
		Schedule X (Non-Domestic Change of Occupier)	1.3 In the case of a Change of Occupier with a Switch, this REC Schedule **needs to shall** be read in conjunction with the processes applying in relation to a Switch under the Registration Services Schedule, as further described in Paragraph 3 **of this REC Schedule**.	
		Schedule X (Non-Domestic Change of Occupier)	**1.5 RECCo shall make prepare, available via the REC Portal and review and update a periodically non binding document to guidance supplement this REC Schedule.**	
		Schedule X (Non-Domestic Change of Occupier)	2.3 In making a determination under Paragraph 2.3, the Energy Supplier **must shall** have regard to the non-exhaustive examples of evidence listed in Appendix 1.	

		Schedule X (Non-Domestic Change of Occupier)	2.4 All communications by the Energy Supplier under Paragraph 2.2(b) or 2.2(c) shall be in writing, and shall be addressed to **whoever submitted notification of the purported Change of Occupier (which may be the Consumer or a TPI acting on behalf of the Consumer) the Consumer and/or the Consumer's representative**. All such communications must be in plain and intelligible language. If the Energy Supplier rejects a purported Change of Occupier, then the Energy Supplier shall clearly explain the reason(s) for the rejection. If the Energy Supplier requests further information, then the Energy Supplier shall clearly explain what is required and why.	This is stylistic. Therefore, the Code Manager has not made the change as it would not change anything legally. Paragraph 3.3 already refers to the Gaining Supplier providing the evidence, but there is no harm in this addition, which the Code Manager has now included. The Code Manager has deleted the reference to condition 14. All of (a), (b) and (c) should be consistent – either including reference to SLC 14 or not. The word 'only' should remain for consistency with 2.2(c).
		Schedule X (Non-Domestic Change of Occupier)	3.2 This Paragraph 3 **is to shall** be read in conjunction with the processes applying in relation to a Switch under the Registration Services Schedule, including:	
		Schedule X (Non-Domestic Change of Occupier)	3.4 If a Losing Supplier receives evidence of a Change of Occupier **from a Gaining Supplier** pursuant to Paragraph 3.3, then the Losing Supplier shall, within 10 Working Days of such receipt:	
		Schedule X (Non-Domestic	3.4 (b) determine that there has not been a Change of Occupier, and notify the Gaining Supplier in	

		Change of Occupier)	accordance with Paragraph 3.6 and will continue to raise an Objection to a Switch as set out in **Condition 14 of** the Energy Supply Licence**s**; or	This is stylistic. Therefore, the Code Manager has not made the change as it would not change anything legally. The Code Manager believes the reference here to SLC14 is helpful in pointing the reader to the correct licence condition and will therefore keep this reference in the legal text.
		Schedule X (Non-Domestic Change of Occupier)	3.4 (c) **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 and will continue to raise an Objection to a Switch as set out in **Condition 14 of** the Energy Supply Licence**s**.	
		Schedule X (Non-Domestic Change of Occupier)	3.5 In making a determination under Paragraph 3.4, the Losing Supplier **must shall** have regard to the non-exhaustive examples of evidence listed in Appendix 1.	
		Schedule X (Non-Domestic Change of Occupier)	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 Licence**s**.	
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	The proposed updated definition of a Non-Domestic Supplier, we believe should be updated again. A Non-Domestic Supplier will not be supplying a Domestic Premises when acting in relation to a Non-Domestic Premises, this in our view, is not accurate. A Non-			Thank you for your response and alternative wording suggestion. The supply licences distinguish between Domestic Premises and Non-Domestic

	Domestic Supplier will be supplying a Domestic Premises via a Non-Domestic Contract. Therefore, as suggested within our IA, the definition should be – *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 via a Non-Domestic contract.* We note that the suggested amendments to the CoO schedule have not been addressed within this consultation. Non-Domestic Change of Occupier Schedule – Clause 1.1 – Premise should be amended to 'Premises' Clause 2.4 – Should be amended to - *All communications by the Energy Supplier under Paragraph 2.2(b) or 2.2(c) shall be in writing, and shall be addressed to whoever submitted the notification of the purported Change of Occupier* We note amendments have been made to Clause 3.6, however as we noted within our response to the IA, not all non-domestic Gas Suppliers have access to the SDEP as it is voluntary for these. This needs to be considered, which we do not believe has happened within the updated documentation. As also noted within our IA response - *We feel that the summary for sub-lease needs to be extended, to clarify that we may request the 'head lease', which demonstrates that a party is able to sub-lease.*	Premises. These concepts are then used to define Domestic Customers and Non-Domestic Customers. The supply licences do include a concept of Domestic Supply Contract (but not of Non-Domestic Supply Contract, or Non-Domestic contract as you have suggested here). The concept of Domestic Supply Contract is also based on supply to a Domestic Premises. We therefore think it is best to refer to the primary distinguishing concept of Non-Domestic Premises (rather than other concepts which depend on the definition of Non-Domestic Premises). A Change of Occupier will occur when a property is subleased to a new occupier. This will occur whether or not the head lease permits subleases. Similarly, a change of occupier will also occur even if the sublease is poorly drafted. The energy supplier does not need to concern itself with whether or not the head lease has been breached, or whether or not the lease is well drafted.

	For the contractual right or license to use a property, we believe there should be more detail in the summary to specify the quality of document expected. It appears that this has also not been updated. We still strongly believe that there should be a standard 'First Tier' list that all suppliers should receive upon a request, with a 'Second Tier' of documentation that Suppliers can then request, if they wish to receive additional confirmation of the changes. We do not believe that the current approach will reduce the concerns of industry parties and that there may still be different results dependant on supplier's practices. Unless this approach is taken, we do not believe the problem statement will be addressed as there will still be *'Inconsistent requests from suppliers for proof they are the new owner/occupier or responsible bill payer'.*	Thank you for your response. The Code Manager will review these suggested amendments prior to the final legal text being published, and make the changes where required. The single list was drawn up based on detailed discussions at the R0155 Working Group with input from REC Legal advisors. During the Working Group discussions, it was decided that a first and second tier list would not suit the solution. The R0155 approach sets out a solution for the majority of cases while also allowing suppliers flexibility if required.

		The summaries were drafted by REC Legal Advisors prior to the impact assessment. The Legal Advisors reviewed the suggestions from the impact assessment responses and deemed that the summaries were not required to be extended/updated. The single list was drawn up based on detailed discussions at the R0155 Working Group and redrafted by REC Legal advisors. During the Working Group discussions it was deemed a First and Second tier list would not suit the solution. The R0155 solution approach also sets out a solution for the majority of cases while also allowing suppliers flexibility if required.

Question 4:	4 Do you identify any benefits to your business or to the industry through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	Delays to the process of implementing a Change of Tenancy can result in significant cost implications for venues because of bill payers being forced to pay for their energy through lengthy periods on deemed rates. Such delays and the significant financial pressures this places on customers can quickly push individuals into debt, even in situations where a venue is considered profitable under normal conditions and when exposed to reasonable operating costs. This also has potential longer-term consequences with individuals unable to sustain their business or difficulties in securing future contracts and which threatens the viability of pubs, which are a focal point of their communities, providing jobs, supporting other local businesses and helping to tackle public health impacts such as loneliness and social isolation as well as providing a safe, inclusive and welcome environment for all. We welcome the introduction of a 10-day SLA to review the documents required to support a change of tenancy request and which is likely to bring a significant benefit in terms of reducing the time taken to action this request. However, without further consistency in the control of documentation to support a change of tenancy request this threatens to undo some of this benefit and	Thank you for your response.

	ultimately to undermine the intention of creating a fairer, more robust process.	
British Gas (Energy Supplier)	As stated within our response to question 2.2, we see limited benefits specifically to our business due to the current robust processes we have in place which meet the proposed timescales and evidence requirements. However, there are significant benefits of this change from a wider industry perspective. We are supportive that this change will bring about increased visibility of evidentiary documentation, reducing the risk of fraudulent activity. From a customer perspective, having consistency between suppliers in documentation requests is in alignment with Ofgem's vision to prevent poor customer outcomes across the change of tenancy journey. This builds consumer confidence, which will deliver an indirect benefit to our business.	Thank you for your response.
Brook Green Supply Limited (Energy Supplier)	We support the customer facing solution and have identified benefits to consumers through a more consistent and expedient process. We believe that the solution balances the needs of consumers, suppliers and third party intermediaries and reduces ambiguity pertaining to acceptable evidentiary documentation. We also believe that mandating a single system to communicate CoT with a Switch between suppliers is a positive step for consistency. We do not see a benefit to the current reporting requirements and believe that this is a detriment, unnecessary, outside of the RECCo's remit, and unduly onerous on suppliers.	Thank you for your response. Please further see the Code Manager comments in response to the questions on the Performance Assurance Requirements.

Business Energy Direct (UK) Ltd (Third Party Intermediary)	The biggest benefit appears to be standardising documents a supplier can be provided with / request, however as the list isn't exhaustive it still allows suppliers to request further documents should they wish to, this enables suppliers to delay the transfer for no other reason than because they "require" further documents. Suppliers need to recognise the difference between something needed to be provided (for example as part of regulation or law) and something they would like to be provided with (a request that isn't compliant with anything). The 10 working day window sets a time frame to review the COT, but our concern is that some suppliers could see this as "we are given 10 days, so we will take 10 days". If all responses are issued on the 10th working day, this would leave end users exposed to at least 10 days of deemed prices. Whilst a supplier may take longer than the industry average, I don't believe RECCo could do anything about it if it's within the set SLA. We would like to see a performance assurance review 3 months after any approved scheme is mandated, to identify if some suppliers are using the full 10 days and whether any suppliers are managing the COOs more efficiently and the average time is less.	Thank you for your response. In response to the last point you raise, the priority for Performance Assurance is to ensure REC Parties are operating in line with the Code requirement, and the solution includes reports we will use for risk monitoring. We can see Energy Suppliers may be interested in seeing how efficient their process is compared to their peers; however, this would increase the reporting requirements on the Parties as well as the total cost of assurance. Therefore, REC Performance Assurance do not propose to amend the reporting requirements as they do not believe Performance Assurance interventions are required where Parties are compliant. Please note, though, that the Code Manager still has the ability to carry out a post-implementation review of all change, including looking at performance assurance.
Citizens Advice (Consumer Advocate)	No response.	
Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	We believe that the introduction of evidentiary and process standards is a positive step which will be beneficial to suppliers, consumers and TPIs, although we have not quantified these benefits.	Thank you for your response.

Ecotricity (Energy Supplier)	The proposal offers a consistent approach, enhancing the relationship with customers in managing the process more effectively. It improves the accuracy of notifications and supplier responses to switching requests. With a unified set of requirements, all suppliers will be aligned, and the requirement for customers informed about the required documentation. Additionally, the potential for digitalisation and automation of the Change of Occupier process could save time, optimise resources, and improve the accuracy of data flow.	Thank you for your response.
EDF (Energy Supplier)	No comments.	Thank you for your response.
ENGIE (Energy Supplier)	Yes, there are benefits to be gained by implementing the solution, but not in the proposed timescale for the reasons outlined in our response to Question 1. These benefits include improved consistency of approach across suppliers regarding the type of evidence of CoO that is acceptable, and an agreed service level which will enable better setting of consumer expectations.	Thank you for your response.
ICoSS (Trade Body)	We have been supportive of the development of the customer-facing solution proposed as it will balance the competing requirements of customers, energy suppliers and brokers to ensure that valid change of tenancy requests are processed in a timelier manner, whilst reducing the risk of fraudulent activities. We have not identified any benefits from the reporting requirements proposed. They will not bring positive any customer benefits who will be required to ultimately pay for suppliers providing this information.	Thank you for your response. Please further see the Code Manager comments in response to the questions on the Performance Assurance Requirements.

ScottishPower Energy Retail Limited (Energy Supplier)	We have not identified notable benefits associated with this proposal in its current form. In line with our response to the party impact assessment and this consultation, we believe that a single and more definitive list of evidence options for non-domestic Change of Tenancy would bring benefits to consumers and the industry, but that this proposal, in its current form, would not deliver that outcome.	Thank you for your response. The workgroup discussed this list at length. We believe after legal advice that the list put forward makes a sensible list of evidence to help the COO process.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Partially, with a consistent approach to the CoO, customers will start to see improvements in this process but unless the evidentiary documentation is tiered as suggested, we foresee that additional changes will need to be made in future.	Thank you for your response.

Question 5:	5 Please provide details and examples of any costs incurred by your business as a result of implementing the processes included in the legal text solution.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	Benefits in relation to costs are measured against the time taken to complete a change of tenancy and during which time customers will typically be placed on expensive, deemed rates. Introducing fair market rates, rather than defaulting to deemed or out-of-contract rates after the 10-day period, would deter suppliers from prolonging the process. Since suppliers cannot invoice the correct customer until the change of tenancy is completed, this approach would incentivise them to act promptly. Our members have repeatedly reported to us that the change of tenancy process takes place over a period of months, and which is in stark contrast to the 10-day SLA proposed here and which we welcome.	Thank you for your response. Please see the Code Manager's earlier comments.
British Gas (Energy Supplier)	We cannot accurately predict the monetary value this change will drive, due to existing alignment with the proposed solution across evidence and SLAs. However this change will drive additional resources required to monitor SDEP, which therefore has an overall financial impact.	Thank you for your response.
Brook Green Supply Limited (Energy Supplier)	We envisage costs relating to training staff and continuous professional development. We also envisage a more significant cost relating to the development of reporting to meet the current requirements, of which we are not in support of.	Thank you for your response. 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.
Business Energy Direct (UK) Ltd (Third Party Intermediary)	As a TPI I don't see any direct costs however there are costs to the end user if they are left exposed to deemed, as highlighted previously. We would expect as a result of implementing this change, that supplier behaviour would change, but it needs to be closely monitored from the very beginning.	Thank you for your response.
Citizens Advice (Consumer Advocate)	No response.	Thank you for your response.
Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	We expect to incur costs to make limited system and process changes to ensure we have robust controls in place to manage the new SLAs and to train our staff on the new requirements. This includes ensuring that we'd be able to record and report on requested data fields included in the proposed PARC requirements. If proposals requiring suppliers to monitor SDEP for receipt of evidence from gaining suppliers are implemented, we would incur costs to provide access and train additional individuals on SDEP.	Thank you for your response.
Ecotricity (Energy Supplier)	We're not in a position at this stage to assess the full impact, as this is likely to affect multiple areas of the operation.	Thank you for your response.
ENGIE (Energy Supplier)	Costs will be incurred in systems development, reporting development, process mapping changes, internal communications and training. The proposed reporting scheme will increase the cost burden further and we do not agree that it should be part of the solution.	Thank you for your response.
EDF (Energy Supplier)	No comments.	Thank you for your response.

ICoSS (Trade Body)	The customer-facing solution will represent for some members a small cost saving in terms of reduce operational costs from managing change of tenancy issues. Our members will provide detailed information on their costs where appropriate, but the view of ICoSS is that the costs from the reporting requirements will be substantial in both development costs and ongoing operational costs, with no appreciable customer benefits	Thank you for your response. To support the cost-benefit analysist of the Change Proposal, Parties or their trade bodies are asked to provide detail of costs, where appropriate. Any costs that can be provided are much appreciated by the Code Manager and are of great assistance. If no costs are provided, the Code Manager will rely upon the intangible benefits identified.
ScottishPower Energy Retail Limited (Energy Supplier)	As an energy supplier, we would incur costs in adapting our systems and processes to accommodate the new non-domestic CoO regime, should this proposal ultimately be progressed in its current form. These adaptations would primarily concern our functionality to map our retention of relevant evidence in line with the proposed Schedule. However, we believe that the suitability of this proposal should be assessed against not only the financial costs, but the main alternative (ie a single evidence list).	Noted. Thank you for your response. An alternative of a single evidence list has been extensively explored as part of the R0155 working group. During the Working Group discussions it was clear that there is no single evidence list solution for either the list or Energy Suppliers' validation steps.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	We are currently unable to quantify the costs to our business however, changes will be required to current processes including within our sales and contract retention department. The CoO team will also need training on the new processes along with the use of the SDEP. We will also require additional resource to record the data in which REC are requesting, whilst maintaining the current processing rate of CoO's. Any additional reporting requirements	Noted. Thank you for your response. The Code Manager notes that the performance assurance reporting requirements have been scaled back,

	will put extra burden on suppliers as a whole. Although within the Domestic Market emphasis is put on costs passed down to the consumer, it is likely that this will become true within the Non-Domestic market, where suppliers will be needed to quantify the costs in which they pass onto the consumer. Any additional resource intensive reporting will ultimately increase the cost to serve our customers and this needs to be considered. Whilst we agree that changes are required, we need to ensure that any such changes do not have a detrimental impact on our cost to serve, in addition to achieving the CoO SLA.	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.

Question 6:	6 Taking into consideration both the costs and any benefits seen, do you consider this change should be made?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	We do not support the approval of the current version of the Schedule. We do however strongly support the process of making the change of tenancy process more robust and timebound, including holding suppliers to account who do not follow this process correctly.	Thank you for your response.
British Gas (Energy Supplier)	Whilst we are very supportive of the approach taken to set out a non- exhaustive list of evidentiary documentation and standardising SLAs; the use of SDEP as a method of communication between suppliers to review CoO with a switch documentation will be challenging with FMRS timescales. With customers able to switch supply within 5 days, the timeframe for a supplier to review any supporting evidence before objecting to a switch is approximately 2-3 days. Given the uncertainty of volumes likely to be generated through the SDEP process, the resource requirements to manage the process are unclear. We are also very concerned over the level of performance assurance associated with this change, which we set out further down in our response. As such, we have raised an alternative proposal to REC. The deferral was not to stop the change, it was merely to allow the change going through without the performance assurance aspect, therefore allowing the industry and RECCo to agree suitable performance assurance measures. Again, we agree with the change in principle, but not the performance assurance aspect. It is our position that this will	Noted. We do not expect there to be a significant change in the numbers CoO that you currently require documentation for. The resource requirements could therefore be estimated accordingly. Noted. Unfortunately, the alternate Change Proposal was submitted too late to be considered alongside this change. However, the Code Manager has engaged with the respondent to explain this but also to discuss their proposal and recommendation further.

	deliver all the benefits set out by the code manager, whilst removing an onerous burden on suppliers and removes the risk of using a system which is not fit for this process.	
Brook Green Supply Limited (Energy Supplier)	We support the change from a customer-facing solution as it provides a better customer experience and can help to reduce negative outcomes such as bad debt, however, do not believe that the change should be made without further discussion and engagement surrounding the reporting requirements, which we feel are currently unduly onerous, unnecessary, costly, and outside of the remit of RECCo. Taking everything into consideration we do not believe that the change should be implemented without revisiting reporting requirements, as the change needs to be viewed holistically across the customer solution / supplier communication (e.g SDEP or similar) / and reporting requirements. We do not believe we should proceed until more consideration is given to the reporting requirements.	Thank you for your response. Please further see the Code Manager comments in response to the questions on the Performance Assurance Requirements and SDEP.
Business Energy Direct (UK) Ltd (Third Party Intermediary)	I believe it is a step in the right direction and sets out some basic standards, but I strongly believe that more should be done to protect end users from being left exposed to high deemed charges. We still have concerns regarding unlawful objections activity and would like to see further steps or guidance provided by RECCo prior to the change being implemented.	Noted. Thank you for your response. The Code Manager will consider if and what guidance, as part of the supplementary R0155 guidance document, should be provided prior to implementation. The Code Manager is also continuing to explore unlawful objection activity as part of REC Issue I0213.
Citizens Advice (Consumer Advocate)	Yes. We anticipate the benefits of this change will significantly outweigh any costs. Time and resource reductions for non-domestic customers from having a clearer process in communicating with non-domestic suppliers will provide cost	Thank you for your response.

	savings to businesses and suppliers. Reducing the period and likelihood for which non-domestic consumers are on deemed contract rates will also provide crucial benefits.	
Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	As detailed in our answer to question 1 above and question 1 in both sections 3 and 4 below, we continue to oppose mandating suppliers sharing CoO evidence via SDEP and the proposed Performance Assurance reporting requirements. We believe RECCo should reconsider its position on these aspects of the Change Proposal before this change is taken forward.	Noted. Thank you for your response.
Ecotricity (Energy Supplier)	As a responsible supplier, we recognise the value of a more standardised approach and a clear set of SLAs, which will support suppliers and improve customer outcomes.	Thank you for your response.
EDF (Energy Supplier)	Yes. EDF agrees the change should be made. We do not support the position of the performance assurance review and reporting requirements, as set out alongside this consultation. However, we note REC has subsequently brought a revised approach to performance assurance to the PAB (25/11) - RECPAB_24_1126_01. This new proposal represents a more pragmatic solution.	Thank you for your response. 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. Please further details, including the justification of the approach(es), in the document titled 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'.
ENGIE (Energy Supplier)	No, we do not agree that this change should be made as we do not believe the proposed implementation date is achievable without an unacceptable degree of risk to the success of the	Thank you for your response. Please further see the Code Manager comments in response to the questions on SDEP.

	change, the proposed use of SDEP for communication is not a robust solution and the reporting requirements are unnecessary, onerous and costly.	
ICoSS (Trade Body)	No. On balance we cannot support this change and so do not support its implementation. We believe that the customer-facing solution is workable and pragmatic, balancing the benefits of streamlining the solution, and the need to prevent fraudulent use of the solution. It is extremely disappointing that more consideration has not been given to the development of a proportionate reporting regime with the industry.	Thank you for your response. Please further see the Code Manager comments in response to the questions on the Performance Assurance Requirements.
ScottishPower Energy Retail Limited (Energy Supplier)	In line with our responses to Questions 1 and 2, we are not persuaded that the architecture which this proposal would introduce under the REC is warranted in the circumstances or that it would bring sufficient benefits to consumers. We believe that the alternative of a single list of evidence options for non-domestic Change of Tenancy would deliver the same or greater benefits as the current proposal with less cost and effort. We believe that it would be more proportionate to introduce the full list of evidence options initially and that, after its implementation, subsequent evaluation of its impact could inform whether consideration should be given to more prescriptive measures such as those set out in this proposal. In that light, we do not believe this change, in its current form, should be made.	Thank you for your response. Please see the Code Manager comments to your responses in Questions 1.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	We agree there is a need for changes to be made to the Non-Domestic CoO area but we believe that there needs to be some amendments made to the current solution as we have alluded to within other responses.	Thank you for your response.

Question 7:	7 Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	No	Thank you for your response.
British Gas (Energy Supplier)	We have no further comments relating to this change proposal.	Thank you for your response.
Brook Green Supply Limited (Energy Supplier)	We believe that more consideration should be given to the reporting requirements, removing the necessity for disaggregated MPxN line level data before any final determination is made on this modification. It should be clear that this modification surrounds the review of documentation supporting the CoO within 10 working days and not the processing time for the entire CoO process. Some of the language and reporting requirements conflate this and we only support the customer-facing solution of 10 working days to review documentation, not 10 working days to process the entire CoO.	Thank you for your response. The Code Manager is in the progress of reviewing and considering the reporting requirements. Noted. The 10 working days is to review documentation, not process the entire COO, and the Code Manager will ensure further clarity is provided in the Final Change Report.
Business Energy Direct (UK) Ltd (Third Party Intermediary)	More and more suppliers and TPIs are or have introduced termination fees in customer contracts, and these are often enforced because a supply transfer has failed due to unlawful objection activity. We would like RECCo to introduce a method of recourse for customers to ensure that they are not left out of pocket by a supplier that objects (one or more times) but eventually actions the COO, thereby recognising the new customer.	Thank you for your response. This is out of scope of this change.

	Presently these issues can go on for months on end and the unintended consequences are a customer being exposed to different market conditions if they find it necessary to agree a supply contract for a second or third time. An objecting supplier should be liable for that detriment under the rules and if they are aware of this, then they are likely to be more diligent and carefully consider each objection, rather than using the objections process as a means to an end. If the customers are given this level of protection, this change will be the one that provides greater benefit than any other in the industry for the past decade.	
Citizens Advice (Consumer Advocate)	No response.	Thank you for your response.
Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	We have no further comments.	Thank you for your response.
Ecotricity (Energy Supplier)	We would recommend that a copy of the lease surrender document along with the required notice period from the Tenant become mandatory documents. We welcome robust guidelines on what the responsibility of all participants including where the customer has responsibilities and the time frames required to provide the relevant correct information on vacating a property. It's important that all participants activities are observed and to also support suppliers in ensuring that they are not subject to additional costs caused by a delay in obtaining information to complete the Change of Occupier.	Thank you for your response. The Code Manger explored the documentary evidence at some length during the workgroups but will consider your recommendation again in our final submission. The Working Group agreed it for individual to decide what processes they

	Could support/templating be provided to ensure authenticity of documentation, guidance relating to the authenticity of documentation for non-legal execs would be appreciated. It would also be advantageous to be provided with example documents to avoid ambiguity and ensure we comply with the new rules. Further guidance where the customer does not supply the appropriate evidence within the window would be appreciated.	wish to follow. The Code Manager notes that there are already industry forums that shares examples of fraudulent documents that can offer advice or support, including an Energy UK led group. In this situation it would be up to each individual Supplier to determine the next steps in line with their T&Cs and provide communication to the Consumer, providing them with the flexibility to determine the most appropriate next steps with their Consumer. This includes setting out clearly what evidence is required and what will happen if it is not provided.
EDF (Energy Supplier)	No comments.	Thank you for your response.
ENGIE (Energy Supplier)	To be able to support this proposal we would need changes to extend the lead time to 12 months, to provide a mechanism for managing complex CoOs outside of the SLA and to remove the performance assurance reporting requirements. We would also support a pre-implementation review to confirm Parties' readiness to move to the new SLAs with revisions to either the implementation timescale or the SLAs as a potential outcome of that review.	Thank you for your response.
ICoSS (Trade Body)	We believe that an alternative that removes the onerous and disproportionate reporting requirements should be formally considered before any final determination is made on this modification.	Thank you for your response. 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

	We would also note that Ofgem is currently developing a regular RFI aimed at non-domestic customers, and it is likely that it will cut across a significant amount of the work proposed here for suppliers. Consideration should be given to aligning the REC reporting requirements with that of Ofgem's to reduce costs.	the new Ofgem COO requirements, once these are consulted on and finalised. Please see further details in the document titled 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'.
ScottishPower Energy Retail Limited (Energy Supplier)	We note that the Code Manager states in the Change Report that a "Housekeeping Change" will be made to the defined term "Non-Domestic Supplier" in Schedule 1 (Interpretations and Definitions) of the Code. In that case, we would like clarity from the Code Manager on whether it intends to raise a Housekeeping Change Proposal to advance that proposed change to Schedule 1.	Thank you for your response. Yes, as stated in the Change Report it will be raised within a future REC Housekeeping Change. The Code Manager currently intends to include this as part of a February 2025 wider Housekeeping Change.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	It was observed within the most recent workshop for I0189 - Voice of the Consumer, that a proposal was noted that a Consumer Satisfaction type survey could be conducted when a CoO has been completed. In our view, this would be the only true indication of whether a consumer is happy with the process and whether the supplier is achieving their SLA. With this in mind, we believe it would be beneficial to delay any reporting requirements until REC have considered this option. As REC are aware, consumer satisfaction surveys already provide an indication of the level of service they have received within the SMICoP installation surveys, whilst this survey would also come at a cost, whether a supplier outsources the requirements or whether they hold these internally, we believe that these costs will be less than the resource intensive reports REC are proposing thus, reducing the overall cost to serve our customers.	Thank you for your response. Change of Occupiers are not guaranteed to be within the scope of I0189, but the Code Manager will consider if it would be a way to measure the outcomes of R0155 after it has been implemented. The Code Manager invites the Supplier to take part in the I0189 Working Group discussions to engage with the REC further on this suggestion.

2. Questions on the Use of SDEP

Question 1:	1 Do you agree with the decision to mandate the use of SDEP as part of the Change of Occupier process? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	Yes	Thank you for your response.
British Gas (Energy Supplier)	The whole use of SDEP without its own designated work queue would add complexity and delays to the process. We believe this process would need its own work queue or a manual work around/interim solution, until sufficient development has been made within SDEP, to cater for this process. As this will not be until REC delivers against R0122, our position is that SDEP should not be mandated at this time. As stated within our response within section 2.2, both SDEP screens (PT0056 and PT0057) are currently active with multiple industry escalations within them. Mandating the use of SDEP will only add to the existing backlog that exists for escalations. Given the timeframes being set out for a CoO with a switch, using SDEP risks ensuring that these timeframes are upheld and makes operational management of these queues extremely complex.	SDEP is the REC's secure means of sharing data. The solution was discussed at the Working Group to establish if another tool could be used, for example Huddle, and the Working Group decided SDEP should be used. The SDEP screens were selected following careful consideration as they had the least traffic of all SDEP screens. The 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. The Code Manager added wording to the Schedule to allow Suppliers the freedom

		to use SDEP or an alternative they agreed bilaterally. In their impact assessment responses 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. The Code Managers notes that SDEP users have the ability to mark a message as unread or assign it to a specific user. If the user leaves or is unavailable anyone can work or reassign the query. This limits the risk of missed or miscategorised messages. The Code Manager will progress the Change Proposal for the new SDEP screens 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.
Brook Green Supply Limited (Energy Supplier)	We agree with the decision to mandate the use of a single system / communication method, as this improves efficiency with communication and creates a consistent way for suppliers to interact, however we remain unconvinced as to the use of SDEP itself without new Process Types. We believe that this should only be viewed as an enduring solution should the system be developed with new Process Types specific to the CoS with a CoT flag process (CoT with switch).	Thank you for your response. Please see the Code Manager response above to British Gas's comments.

	We believe that SDEP is the best currently available solution but are keen that adopting this as a solution does not hinder future development, supporting a move away from Process Types that have been re-purposed.	
Business Energy Direct (UK) Ltd (Third Party Intermediary)	n/a	Thank you for your response.
Citizens Advice (Consumer Advocate)	No response.	Thank you for your response.
Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	No. We disagree with mandating the use of SDEP where suppliers exchange information about CoOs. SDEP has not proven itself to be a reliable platform for suppliers and many non-domestic suppliers are poor at monitoring and responding to existing SDEP cases which has contributed to a marked increase in Contract Manager escalations. Without consistent use of SDEP across the market, we expect its introduction for CoOs to merely slow down the process, particularly where the gaining supplier is reliant on a response from the losing supplier to resend registration flows. Instead, we believe an easier alternative approach would be detailing in guidance that a gaining supplier should instruct its customer to provide the same evidence directly to the losing supplier to ensure the CoO can be processed within 10 working days – an action that will be confirmed in writing – therefore allowing the gaining suppliers to reissue registration flows at the appropriate time.	Thank you for your response. Please see the Code Manager response above to British Gas's comments. The R0155 solutions sets out that the ideal outcome is for the consumer to inform both suppliers. If they do this then the risk of the objection and the R0155 solution for a Switch is greatly reduced.
Ecotricity (Energy Supplier)	We support the use of SDEP; however, we would appreciate further clarification on how documentation will be managed by TPIs especially where multiple MPANs are involved.	Thank you for your response.

EDF (Energy Supplier)	EDF supports the creation of specific transactions to serve the exchange of data set down in this change (without prejudice to the MHHS Code Freeze). However, we do have concerns regarding the interim solution using Duplicate Meter Point transactions (please see our Section 2.Q2 response, and Section 3.Q2 response below).	Thank you for your response.
ENGIE (Energy Supplier)	No, as SDEP will not be able to be changed to provide a robust solution.	Thank you for your response.
ICoSS (Trade Body)	We have not yet formed a view on this aspect of the proposal. Considering that no changes to the SDEP can be made for some time, we believe that no commitment should be made to an enduring solution based on the SDEP.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	We are not convinced that SDEP should be mandated for supplier-to-supplier communications for Changes of Occupier with a Switch while the platform cannot currently be configured to create a clear and dedicated channel for that process (due to the MHHS Code Freeze). In our view, a single avenue for communication should only be mandated in the Code where it is duly capable of facilitating that communication. In this case, we do not believe that an unamended SDEP would fulfil that capability. On balance, we consider that one or more alternative methods of communication should be accepted until or unless SDEP is suitably configured for non-domestic CoO with a Switch (CoS) specifically.	Thank you for your response. Please see the Code Manager response above to British Gas's comments.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Yes.	Thank you for your response.

Question 2:	2 Do you agree with the proposal for the interim solution to use Duplicate Meter Point screens (PT0056 & PT0067) for sending the information and also for sending any escalations? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	We do not have sufficient data to answer this question	Thank you for your response.
British Gas (Energy Supplier)	As per our response to section 3.1. However, to reiterate again, we strongly advise that these queues are not used for this purpose due to the complexity that already exists within SDEP.	Thank you for your response.
Brook Green Supply Limited (Energy Supplier)	It is an imperfect solution as we are using Process Types that are for duplicate meter points, and not for CoT with a Switch. We believe that more work needs to be done to determine an enduring solution, such as further development of SDEP and a move to a distinct Process Type.	Thank you for your response.
Business Energy Direct (UK) Ltd (Third Party Intermediary)	n/a	Thank you for your response.
Citizens Advice (Consumer Advocate)	No response.	Thank you for your response.
Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	Notwithstanding our opposition to using SDEP for this process, we do not agree that Duplicate Meter Point screens are the appropriate Process Type (PT) screens, as they are strictly reserved for metering queries. Expecting CoO queries to be manually recorded for an interim period is unreliable and a request that is destined to fail,	Thank you for your response. Please see the Code Manager response above in Section 2 Q1 to British Gas's comments.

	contributing to ownership issues and process delays. If SDEP is to be used for this process, we would strongly encourage that this does not proceed until new PT screens are available that can be used for CoO evidence only.	
Ecotricity (Energy Supplier)	We agree with the use of PT0056 and PT0067; however, we would like to request a proposed timeline for the release of the new screens, along with the wireframes.	Thank you for your response. Please see the Code Manager response above in Section 2 Q1 to British Gas's comments.
EDF (Energy Supplier)	EDF supports the creation of specific transactions to serve the exchange of data set down in this change (without prejudice to the MHHS Code Freeze). However, we do have concerns regarding the interim solution using Duplicate Meter Point transactions (please see our Section 2.Q2 response, and Section 3.Q2 response below).	Thank you for your response.
ENGIE (Energy Supplier)	No. We believe this is an unacceptable compromise which will lead to confusion, lack of understanding and take-up and inconsistency of approach. It will also create legacy issues when an enduring solution is implemented. We do not agree that use of SDEP should be mandated for this change.	Thank you for your response. Please see the Code Manager response above in Section 2 Q1 to British Gas's comments.
ICoSS (Trade Body)	We believe it should be seen as the enduring solution as the SDEP solution cannot be implemented for some time. A further change can be raised in the future to mandate the SDEP solution if required.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	In line with our response to Question 1, we do not consider it optimal to repurpose an existing SDEP process type for non-domestic Change of Occupier with a Switch. We are not convinced that such an approach would be effective in facilitating good communication between suppliers on this subject. Indeed, it	Thank you for your response. Please see the Code Manager response above in Section 2 Q1 to British Gas's comments.

	might hinder such communication (for instance, if messages are miscategorised within suppliers under “Duplicate Meter Point” or if such messages are directed within suppliers to teams which handle duplicate meter points, but not Changes of Supplier/Tenancy), which would presumably undermine the purported benefits of this change. We do not believe that an unamended SDEP alone should be mandated for supplier-to-supplier communications on this subject, or that an existing SDEP process type should be co-opted for the purposes of non-domestic CoO with a Switch. If SDEP cannot be configured for this change, we believe that one or more alternatives should be accepted.	
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No, there is a significant risk that should an SDEP PT be repurposed, even in the interim period, that cases could be missed. Energy suppliers have different models within their businesses which mean that PT cases are assigned to specific business areas, by adding a CoO use into an area of the business which does not deal with CoO will increase the resource burden for those teams. Even with the best intentions of titling a case of CoO, and with the current SDEP issues (archiving, deleting, reporting etc.) we do not believe this is the most appropriate solution. Whilst we appreciate there is currently a code freeze for MHHS, we believe it would be more prudent to delay the use of the SDEP until the new PT cases can be delivered as per our response to Q1.	Thank you for your response. Please see the Code Manager response above in Section 2 Q1 to British Gas’s comments.

Question 3:	3 Do you have any other comments on the use of SDEP for the proposed R0155 solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	No.	Thank you for your response.
British Gas (Energy Supplier)	We have no further comments on the use of SDEP for this solution.	Thank you for your response.
Brook Green Supply Limited (Energy Supplier)	No	Thank you for your response.
Business Energy Direct (UK) Ltd (Third Party Intermediary)	n/a	Thank you for your response.
Citizens Advice (Consumer Advocate)	No response.	Thank you for your response.
Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	We have no further comments.	Thank you for your response.
Ecotricity (Energy Supplier)	When using SDEP suppliers need to undertake a review of the SDEP processes to ensure they have the correct escalation points and appropriate areas assigned to this new process. We would be keen to understand the proposed view of the REC and Ofgem should suppliers fail to observe or miss the SLA's initiated within the proposed process change, which could be detrimental to other suppliers.	Thank you for your response The REC disputes process is available and can be used by Parties as a method to flag any non-compliance, including related to R0155.

EDF (Energy Supplier)	We note CP R0122 is already underway to address the functional limitations of SDEP. REC's priority should be focusing on the efficient and timely deployment of these proposed improvements, rather than creating makeshift workarounds for processes and reporting which elevate consumer risk and disproportionately increase supplier development and administrative burdens.	Thank you for your response. The 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.
ENGIE (Energy Supplier)	We believe that an alternative, robust and enduring communications solution needs to be considered and the implementation timeframe should be expanded to accommodate this.	Thank you for your response.
ICoSS (Trade Body)	As stated above we do not believe that the use of the SDEP should be mandated as the solution at this time.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	We have no further comments to make on the use of SDEP under this proposal at this stage.	Thank you for your response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	As we have answered in Q5, implementing the use of the SDEP, although we agree with this approach, will require additional teams to be trained.	Thank you for your response.

3. Questions on the Performance Assurance Requirements

Question 1:	1 Do you agree with the revised Performance Assurance reporting requirements (including the inclusion of TPI data items)? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	We fully support the process of ensuring that suppliers are held accountable for following the process laid out in the Schedule. However, we do not believe that the existing version, or the guidance that has been drafted alongside carries sufficient information to ensure that suppliers are aware of the consequences of non-compliance or of failure in their reporting obligations.	Thanks for your comments. This change does not change the consequences that non-compliance with the REC could cause for Suppliers, so change documentation does not cover this. Please refer to the Performance Assurance Methodology and Techniques document that includes the techniques that could apply. These include very serious actions such as referral to Ofgem, placing restrictions on the acquisition of new customers, and defaulting from the REC, which would represent a breach of their Supply Licence. There are also less serious consequences available, with the severity of the consequence related to the seriousness of the non-compliance.
British Gas (Energy Supplier)	The revised performance assurance requirements are not in line with the level of detail we provide to the RECCo, and we would consider onerous for this change. Data protection considerations are also required when more customer data is being requested	Thank you for your response. The Code Manager notes that the performance assurance reporting requirements have been scaled back,

	than RECCo currently receives. Providing this MPXN level data to the RECCo was a concern that we raised during the Impact Assessment and through direct engagement with RECCo, due to lack of clarity around the authority the Retail Energy Code has to request data. As the reporting catalogue required submission of data at an MPXN level, our concerns remain over the controls that are in place to ensure customer data is held compliantly and securely. Our understanding is that this matter has been raised with the ICO and await further guidance on solutions to our concerns. As a data controller, we are accountable for the data that we hold for our customers and as such do not deem this a suitable use of such data. The inclusion of data items related to TPIs is also not in line with what this proposal is intended to achieve. TPIs are not REC parties, so the inclusion of data related to them for a change of occupier process is unrelated and onerous. Ultimately, introducing direct regulation of energy brokers is the only effective and enduring way to ensure that customers are treated fairly across all their interactions and would align with broker regulation in other sectors.	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. A further summary is provided in the document 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'. Reporting on TPIs has also been removed.
Brook Green Supply Limited (Energy Supplier)	We agree with the reduction of reporting requirements to a single report. We disagree with the requirement for MPXN line level data and strongly believe that aggregated data is sufficient to demonstrate adherence to the code and that line level data goes beyond the remit of RECCo.	Thank you for your response. 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

	Aggregated data would meet the requirements as detailed in Section 5 (Monitoring) of the Updates on Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales. Ofgem are also developing reporting in parallel which may create conflicted and misaligned requirements. Therefore, the Performance Assurance Requirements should not be progressed in tandem. We do not see the relevance or necessity of providing TPI data items associated with the CoO. Incomplete evidence / fraudulent documentation / poor TPI performance is managed by the Supplier through TPI agreements and codes of conduct. This is a commercial activity and not the remit of the REC. Disaggregated data, including TPI data, presents a greater data/GDPR risk (as referenced within the Updates on Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales document. We do not support that the change should go ahead with the current reporting requirements.	on and finalised. A further summary is provided in the document 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'. Reporting on TPIs has also been removed.
Business Energy Direct (UK) Ltd (Third Party Intermediary)	I have some concerns around the measurements requested and the fact that a consumer / TPI has no mechanism to challenge / feedback any trends/issues identified with supplier behaviour. There is no form of direct recourse for when a supplier fails to comply (not all end users have access to ADR schemes). The current proposal would allow for a supplier to continuously request further information and refuse to action the COO even when evidence of the COO has been provided, yet the end consumer may have no recourse to take and no mechanism to highlight the suppliers behaviours to RECCo.	Thank you for your response. This is outside the scope of the REC. Noted.

	Whilst we would like to think suppliers act appropriately we have countless examples of suppliers failing to act legally, we have seen directors of registered energy suppliers receiving criminal convictions for fraud and suppliers behaviour towards enforced installations of prepayment meters being questioned by the Select Committee https://committees.parliament.uk/event/17732/formal-meeting-oral-evidence-session these are just 2 examples.	
Citizens Advice (Consumer Advocate)	No response.	
Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	No. Whilst it is reasonable to expect RECCo to collect information that allows it to evaluate suppliers' performance against any new requirements introduced via R0155, the data should be at an aggregate level. It is unnecessary for suppliers to provide MPxN level data as proposed. It would be more reasonable to request average time(s) taken to process requests for all CoOs, meaning suppliers can provide non-MPxN level data. We disagree with the inclusion of TPI identifying data items which are not required to evaluate a suppliers' performance. It also incorrectly assumes that R0137/R0137A will be approved for implementation, thus opening the door for RECCo to collect information about TPIs.	Thank you for your response. 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. A further summary is provided in the document 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'. Reporting on TPIs has also been removed.
Ecotricity (Energy Supplier)	Whilst we would need to further adapt our reporting, we support the revised reporting requirements along with the use of the Change of Occupier process flag. We believe the use of this flag should be mandatory for all participants.	Thank you for your response. The use of the COO flag is a commercial decision for Suppliers to make so was outside the scope of this solution.

	We believe that the inclusion of TPI Data items within performance assurance reporting would be beneficial and would recommend a common data environment (SDEP) with TPIs to ensure transparency of Matrix.	However, the R0155 clearly sets out the consumer benefits in populating it.
EDF (Energy Supplier)	No. EDF does not agree with the reporting requirements set out alongside this consultation. As we commented in response to the Impact Assessment, the reporting requirements are overly granular and disproportionate to RECs needs to monitor compliance. We note that the inclusion of a TPI identifier is wholly unnecessary. Suppliers are bound by the proposed schedule, not TPIs, and the conduct of TPIs is a separate issue which is not captured within the enforcement scope of this process, or within the core objectives of the PAB. Additionally, we note the dependence on CP R0137/A. We expect this change will be delayed, and subsequently abandoned as a result of the outcomes from DESNZ' regulating TPIs consultation. We have provided comments on R0137/A separately. However, we note REC has subsequently brought a revised approach to performance assurance to the PAB (25/11) - RECPAB_24_1126_01. This new proposal represents a more pragmatic solution. However, more detail is required to support an informed decision. We broadly support the new approach of monitoring of process initiation and sampling of performance, provided the opportunity is	Thank you for your response. 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. A further summary is provided in the document 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'. Reporting on TPIs has also been removed.

	made available for relevant suppliers to contribute to a terms of reference document to govern how these measures are conducted. This will be crucial to ensuring the checks are proportionate and effective.	
ENGIE (Energy Supplier)	No. The proposed arrangements rely on self-reporting by suppliers which could lead to inconsistency and a lack of confidence in the figures. This is neither a robust basis for a performance assurance reporting framework which will determine supplier performance outcomes, nor do we think such a framework is necessary for the implementation of this change.	Thank you for your response. 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. A further summary is provided in the document 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'.
ICoSS (Trade Body)	No. This reporting solution represents a significant cost to suppliers, and no case has been made for this level of reporting. There is no need for such a level of reporting to identify potential issues with suppliers' operation of the process, when existing information such as objection rates is available. We also note that Ofgem is currently developing a set of reporting in these areas in parallel. This is likely to create conflicting and misaligned reporting requirements and so, as a minimum, the Performance Assurance reporting requirements should not be progressed whilst work is being undertaken.	Thank you for your response. 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. A further summary is provided in the document 'Updates on the Performance Assurance of R0155 –

	We would be interested in further details as to the assessment the Performance Assurance Committee undertook in this area.	Change of Occupier: Evidentiary Standards and Timescales V2'.
ScottishPower Energy Retail Limited (Energy Supplier)	We welcome the provision of additional information by the Code Manager with this consultation on its proposals for Performance Assurance (PA) reporting under this proposal. In our view, it would be useful for the Code Manager to provide such information for future proposed PA reporting for future proposals at the earliest possible opportunity. We also welcome the streamlining of the indicative PA reporting requirements for this proposal since the party impact assessment. At the same time, we believe that any PA requirements should be both appropriate for and proportionate to the subject matter for assurance. We consider it disproportionate to introduce MPxN-level reporting for the nondomestic Change of Occupier regime. We believe that aggregated reporting would be proportionate and sufficient for the assurance of this proposed regime. By the same token, we are not convinced that the level of detail requested in the fields from the draft PARC extract (including various dates for each switch) are appropriate or proportionate. We also do not agree with the fields relating to Third Party Intermediaries (TPIs), not least as we have seen no compelling rationale for their inclusion.	Thank you for your response. 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. A further summary is provided in the document 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'. Reporting on TPIs has also been removed.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No, we do not see what the benefit of this report will achieve as there will not be clear view of all CoO's, which we believe REC are trying to identify. There are instances within this process that REC have not considered, such as whether the supplier is aware that a switch or CoO is taking place concurrently to the other process. A customer could request a switch with a new supplier	Thank you for your response. 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

	(within 2 working days) but provide the new supplier with their details. The switch could progress before the CoO, if the customer is out of contract, there will be no reason for this to be objected to so this would not be reported. The level of information being requested in the new proposed report will require changes to our systems and we therefore need to request at least 6 months lead time as we have advised in another response. There are some data items that we do not currently record however we would like to note that this will be an extremely resource intensive report to produce as the required information will need to be completed by the very team that will need to ensure they meet the 10-day SLA. Although we appreciate that REC has reduced the number of reports since the IA, this is still a significant impact on the business	partly be based on the new Ofgem COO requirements, once these are consulted on and finalised. A further summary is provided in the document 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'.

Question 2:	2 Would the proposed Performance Assurance reporting requirements provide any positive or negative impacts to your organisation and/or any additional costs? Please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	N/A	
British Gas (Energy Supplier)	The revised performance assurance requirements are not in line with the level of detail we provide to the RECCo, and we would consider onerous for this change. Data protection considerations are also required when more customer data is being requested than RECCo currently receives. Providing data at an MPXN level monthly, in addition to TPI related data linked to a CoO with a switch would require MI development and cost which is disproportionate to the level of assurance that REC would require to ensure compliance with this change.	Thank you for your response. Please see Code Manager comments on Q1.
Brook Green Supply Limited (Energy Supplier)	Disaggregated MPXN line level data is beyond the remit of the REC. Additional costs would be incurred by the supplier to develop dashboards and reporting to meet the disaggregated requirements proposed. We do not believe that this level of detail is required by RECCo to determine if the requirements are being met.	Thank you for your response. Please see Code Manager comments on Q1.

Business Energy Direct (UK) Ltd (Third Party Intermediary)	We would forecast it to have a negative impact and increased staff costs due to the additional time it would take to manage COO's. Even at this initial stage we are seeing more suppliers requesting additional documents and indicating they are "allowed" to do so under RECCo (for example suppliers are now requesting a copy of the "head lease" where the legally responsible party occupy a property under an underlease). This is despite them NOT requesting evidence of this when they made the sale and took on the supply for the current occupier. The occupier has no legal right to request documents that it isn't party to, especially where they are likely legally binding agreements between two different and likely unrelated legal entities.	Thank you for your response. Noted. As the R0155 solution has not been approved or implemented this is currently outside the scope of the REC.
Citizens Advice (Consumer Advocate)	No response.	
Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	We would incur resource costs to develop new reports in response to the proposed requirements, including to update our systems to ensure we are recording and able to report on all data fields requested as part of the PARC. We disagree with the Change Report's assumed position that there with be no ongoing operational costs of the performance assurance framework. Whilst it is challenging to quantify these costs, each regulatory report is subject to review, analysis and approval before being submitted; suppliers would incur costs for each part of that process.	Thank you for your response. Please see Code Manager comments on Q1. The ongoing costs provided for consultation were Code Manager costs only.
Ecotricity (Energy Supplier)	An assessment would be required to ensure that the current capability, processes, and policies in place are robust inline with the new requirements. From this assessment, it would determine whether there was a need for further resource or digital capability.	Thank you for your response.

	Following this assessment a cost benefit/expenditure requirement would be obtained. At this point in time this assessment hasn't commenced.	
EDF (Energy Supplier)	Yes. The performance assurance reporting requirements provided alongside this consultation would have a negative impact. However, we note REC has subsequently brought a revised approach to performance assurance to the PAB (25/11) - RECPAB_24_1126_01. This new proposal represents a more pragmatic solution. However, more detail is required to support an informed decision. We broadly support the new approach of monitoring of process initiation and sampling of performance, provided the opportunity is made available for relevant suppliers to contribute to a terms of reference document to govern how these measures are conducted. This will be crucial to ensuring the checks are proportionate and effective.	Thank you for your response. Please see Code Manager comments on Q1.
ENGIE (Energy Supplier)	The proposed reporting requirements will have a negative impact and will incur additional costs as the required data will be very difficult to extract from systems and will rely heavily upon manual interventions.	Thank you for your response. Please see Code Manager comments on Q1.
ICoSS (Trade Body)	The proposal has a significant negative impact on suppliers, in particular the cost of creating processes to collate this information for forward transmission. We see no customer benefit in doing so, as we not convinced of the need to monitor supplier activity in this area from day one.	Thank you for your response. Please see Code Manager comments on Q1.

ScottishPower Energy Retail Limited (Energy Supplier)	In line with our response to Question 1, we are concerned that the proposed PA reporting under this proposal, although streamlined, is not appropriate for or proportionate to the change. We believe that aggregated data, instead of MPxN-level data, would be sufficient. Although we have studied the additional information provided by the Code Manager, we remain unconvinced that the level of detail requested in the draft PARC extract would be necessary for the subject matter for assurance.	Thank you for your response. Please see Code Manager comments on Q1.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	We believe this will have a negative impact on our business as we have responded to in the previous question. To ensure we fulfil our SLA, we would need to employ additional resource to manage the increased reporting. We also believe the proposed report is too granular in detail and we cannot see the benefit of receiving this level of information. We would also like to note that should anyone be completing CoO's in an unscrupulous manner, the reports will not provide the correct information, to 'hide' that fact. How to REC foresee monitoring this? We would also like REC to consider the validation elements within the report, we already experience significant issues with this for the upload of current reporting, by adding an additional report with additional validation, will cause an increased workload for our reporting team.	Thank you for your response. Please see Code Manager comments on Q1 and the document 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'. Noted -Thank you for highlighting this. The Code Manager is aware of the issue and will continue to investigate further to rectify.

Question 3:	3 Do you agree with the proposed re-qualification style review at the point of implementation? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	N/A	N/A
British Gas (Energy Supplier)	We are generally supportive of the general principal of a re-qualification style review. As previously described, the approach being proposed is in line with our current processes and controls that would be easily demonstrated at point of implementation. We see a direct benefit of ensuring this change is implemented to a consistent standard across suppliers, ensuring the purpose of the change is met.	Thank you for your comments. REC Performance Assurance will use this initial request to help us validate the extent of further work required based on levels of performance.
Brook Green Supply Limited (Energy Supplier)	Yes, though this should be proportionate and not unduly onerous on suppliers.	Thank you for your response.
Business Energy Direct (UK) Ltd (Third Party Intermediary)	n/a	N/A
Citizens Advice (Consumer Advocate)	No response.	N/A
Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	We do not oppose this providing the readiness assessment questions remain proportionate (as set out in Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales) and suppliers are	Thank you for your response. The Code Manager recognise these requests do require time and effort for Energy Suppliers and have included the

	afforded adequate time to evidence our compliance with the new requirements.	proposed questions in a clarification document.
Ecotricity (Energy Supplier)	The proposed requalification would need to ensure it wasn't unnecessarily onerous for suppliers to fulfil. At this point it is felt that the steps proposed would be unnecessarily onerous and at this point we do not support the implementation of the re-qualification review.	Further details, and the justification, for the proposed requalification can be found in the document 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'.
EDF (Energy Supplier)	No. EDF does not agree with the proposed review set out alongside this consultation. However, we note REC has subsequently brought a revised approach to performance assurance to the PAB (25/11) - RECPAB_24_1126_01. This new proposal represents a more pragmatic solution. However, more detail is required to support an informed decision. We broadly support the new approach of monitoring of process initiation and sampling of performance, provided the opportunity is made available for relevant suppliers to contribute to a terms of reference document to govern how these measures are conducted. This will be crucial to ensuring the checks are proportionate and effective.	Thank you for your response. Further details on the revised approach to Performance Assurance can be found in the document 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'.
ENGIE (Energy Supplier)	We agree that a review at point of implementation relating only to the CoO customer facing obligations could be valuable provided it is not overly onerous. We do not feel it is necessary to term this a "re-qualification" review, instead it could be a "pre-implementation" review. This review could include an assessment of parties' readiness to meet the proposed SLAs and	Thank you for your comments. REC Performance Assurance agree that the framing of the request is important and will refer to this as an information request going forwards. We note that you consider it will not be possible to meet the

	determine whether any amendments need to be made to these in the light of operational experience in the pre-implementation period, or whether that period needs to be extended. This should include a focus on instances where due to complexity or for commercial/contractual reasons it is not possible to complete CoOs within SLA so that these exceptions can still be managed within the framework.	proposed REC requirements. If this remains true once the change has been approved, we will engage directly with you to understand this in detail.
ICoSS (Trade Body)	No. A re-qualification style review of this proposal is disproportionate to the needs of this process and will be representing a proportionately higher cost to smaller suppliers as the cost of such a review are relatively fixed.	Thank you for your response. REC Performance Assurance has engaged with the PAB to consider the proportionality of the re-qualification style review. Further information can be found in the document 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'.
ScottishPower Energy Retail Limited (Energy Supplier)	We do not agree with the proposal to introduce a "qualification" review of suppliers under the nondomestic CoO regime. We are particularly concerned by the suggestion that suppliers would be asked to evidence their application of the change at or before the point at which it comes into effect. We do not believe that a mechanism of this scope and intensity is warranted or proportionate for a proposal of this nature. We note that the Code Manager, in its additional guidance document, states that it, in fact, proposes to issue its related Request for Information once this Change Proposal is approved (should it be approved), which would be even earlier than the date of its implementation. Such an approach would mark a significant departure from how the application of changes by suppliers is reviewed under this Code or, indeed, under the Energy Supply Licences. We believe that	Thank you for your response. The Code Manager acknowledged your comments, however the REC PAB have taken a different view as to the level of risk to Consumer outcomes. To make this as easy as possible, REC Performance Assurance have provided the clarification questions in advance. These are listed in the document 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'. REC Performance Assurance regard giving organisations advance notice of the requests made as useful so that they can plan accordingly.

	this element of the PA requirements should be withdrawn, should this Change Proposal ultimately be approved.	
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No we don't agree, this is above REC's remit. How will REC assess the different business models within industry, although the end result is a CoO with the required documentation, REC cannot advise a business on how they have implemented a change and the documentation that would be required to deliver the change. REC should concentrate on ensuring that after implementation, parties are resolving CoO's within the allotted SLA only.	Thank you for your response. Please see the supplementary guidance document, titled 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2' for further details on the information request. REC Performance Assurance consider that based on the information request included in the guidance document, Energy Suppliers provide information to enable REC Performance Assurance to assess systems and processes specific to an organisation's business model.

Question 4:	4 Would the proposed requalification style review, provide any positive or negative impacts to your organisation and/or any additional costs? Please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	N/A	N/A
British Gas (Energy Supplier)	As per our response to section 4.3, as our process and controls are in line with what is being proposed, through this change, there would be limited impact or cost associated to a re-qualification style review. However, as all REC party members are obligated to complete an annual maintenance and qualification submission, there is a risk that a re-qualification style review introduces a duplication of effort.	Thank you for your response. The Code Manager has updated the proposal, to ensure better communication, and this will now be completed via an information.
Brook Green Supply Limited (Energy Supplier)	Additional financial and time cost in conducting the re-qualification review (e.g. management oversight, reporting, audit)	Thank you for your response.
Business Energy Direct (UK) Ltd (Third Party Intermediary)	n/a	N/A
Citizens Advice (Consumer Advocate)	No response.	N/A
Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	We would incur some resource costs to collate evidence of the steps taken to be compliant.	Thank you for your response.

Ecotricity (Energy Supplier)	At this point we believe there is a duplication of the requirement, as suppliers would be required to complete a full review of the information with no perceived benefit.	Thank you for your response. We note and appreciate the effort required within this Change Proposal. However, REC Performance Assurance have noted that they have seen with other important changes early life monitoring addressing. performance issues and confusions in how to interpret the Code. The Code Manager believes there is benefit of addressing issues early, as this prevents further Consumer issues, reducing Consumer detriment.
EDF (Energy Supplier)	Yes. The proposed review would have a negative impact. However, we note REC has subsequently brought a revised approach to performance assurance to the PAB (25/11) - RECPAB_24_1126_01. This new proposal represents a more pragmatic solution. However, more detail is required to support an informed decision. We broadly support the new approach of monitoring of process initiation and sampling of performance, provided the opportunity is made available for relevant suppliers to contribute to a terms of reference document to govern how these measures are conducted. This will be crucial to ensuring the checks are proportionate and effective.	Thank you for your response. REC Performance Assurance have provided further details, including the justification of the approach(es), in the document titled 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'.
ENGIE (Energy Supplier)	There will inevitably be some costs associated with a review if submissions have to be made to REC but overall we believe the impact would be positive as it would provide the opportunity to	Thank you for your response.

	review whether the SLAs were achievable at the point of implementation.	
ICoSS (Trade Body)	It will result in a potentially significant cost to customers via suppliers for no benefit to the industry and so have a negative impact.	Thank you for your response. REC Performance Assurance have seen with other market changes that early intervention can rapidly address issues, which in this case would benefit both the Consumer, as well as the Gaining Supplier in the case where a Switch is requested. Further justifications for the proposed approach can be found in the document 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'.
ScottishPower Energy Retail Limited (Energy Supplier)	In line with our response to Question 3, we are particularly concerned that the proposed qualification review under this proposal is not appropriate for or proportionate to the change. We note that such an approach has not been applied, with respect to this Code or to the Energy Supply Licences, to changes of greater magnitude to consumers and to industry. Although we have studied the additional information provided by the Code Manager, on which we have set out comments at Question 2 of the following section, we remain of the view that such a mechanism is not appropriate for this change.	Thank you for your response. We note and appreciate the effort required within this Change Proposal. However, REC Performance Assurance have noted that they have seen with other important changes early life monitoring addressing. performance issues and confusions in how to interpret the Code. The Code Manager believes there is benefit of addressing issues early, as this prevents further Consumer issues, reducing Consumer detriment. Further justifications for the proposed approach can be found in the document 'Updates on the Performance Assurance of R0155

		– Change of Occupier: Evidentiary Standards and Timescales V2'.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	This would be negative to the business due to the additional work which would be required to ensure that REC have all the required documentation at the point of implementation. We do not believe this is within REC's gift to request this.	Thank you for your response. REC Performance Assurance have reviewed the performance assurance proposals and have provided a further, updated guidance document, explaining the new proposals and the justification behind the requests. This is titled 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'. The Code Manager will also engage with REC Legal Advisors to ensure that all aspects of the solution, including Performance Assurance, are within the scope of the REC.

Question 5:	5 Do you have any further comments on the Performance Assurance approach for this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	N/A	N/A
British Gas (Energy Supplier)	We have no further comments on the proposed performance assurance requirements, in addition to what has been described within our responses throughout section 4.	Thank you for your response.
Brook Green Supply Limited (Energy Supplier)	Echoing previous answers in this document we believe that disaggregated MPXN line level data goes beyond the remit of the REC and that aggregated data is both more appropriate and adequate for the REC to understand supplier performance against the new requirements. We do not support the implementation of the change without further review of the reporting requirements. An aggregated view of CoO with and without switches by reporting period with the below metrics is sufficient: • Total CoO (with switch / without switch) • Volume / % of CoO where documents reviewed and decision made within 10 working days • Volume / % of CoO where additional documents were rejected and additional documents requested • Average time to review documents • Longest time to review documents	Following engagement with the REC PAB, the Code Manager has updated the assurance approach, which we have summarised in the document 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'.

	• For with switch, volume / % of objections, then split out by statuses suggested on PARC example (in progress / no evidence provided / additional info requested / accepted.	
Business Energy Direct (UK) Ltd (Third Party Intermediary)	Yes. After reviewing the questions RECCo have asked within the Evidentiary Standards and Timescales information request, we would like to understand the responses to Q5. “How do you monitor long running or repeated attempts to use Change of Occupier processes that you are not able to complete?” As a TPI dealing with new store openings for a many different brands, we frequently see delays in COO’s being actioned and often the supplier’s response is that they have historically been notified of numerous different COOs taking place, but they have not actioned them, or they aren’t happy that they had been a genuine COO, so did not process them. The supplier’s pre-conceived assumptions then result in a delay when a legitimate or evidenced COO has taken place. We would like to understand what protection the COO process proposed by RECCo provides customers impacted by such a scenario or the behaviour of a previous occupier (that then results in supplier discrimination). If there is no obligation on a supplier to action a COO until they are satisfied it is legitimate, and there have been previous fraudulent attempts to action a COO, how do we (the industry)	Thank you for your response. The information request will only take place once the outcome of the Change Proposal has been made by the Authority. Therefore, the Code Manager has yet to issue the information request and does not have the responses to Q5.

	ensure that the end consumer isn't impacted by any potential delays because of a supplier?	
Citizens Advice (Consumer Advocate)	No response.	Thank you for your response.
Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	We have no further comments.	Thank you for your response.
Ecotricity (Energy Supplier)	Providing all data related to the Change of Occupier process is accurately captured and transferred, with clear accountability on what is required from both the occupant, TPI and supplier, along with SLA's and definitions, then we agree with the approach.	Thank you for your response.
EDF (Energy Supplier)	We note REC has subsequently brought a revised approach to performance assurance to the PAB (25/11) - RECPAB_24_1126_01. This new proposal represents a more pragmatic solution. However, more detail is required to support an informed decision. We broadly support the new approach of monitoring of process initiation and sampling of performance, provided the opportunity is made available for relevant suppliers to contribute to a terms of reference document to govern how these measures are conducted. This will be crucial to ensuring the checks are proportionate and effective.	Thank you for your response. The Code Manager has revised the Performance Assurance approach. This is further detailed in the updated guidance document titled 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'.
ENGIE (Energy Supplier)	No further comments.	Thank you for your response.
ICoSS (Trade Body)	We are disappointed with the lack of formal discussion with suppliers on this aspect of the solution. We would be interested	Thank you for your response. Following engagement with the REC PAB, the Code Manager has updated the assurance

	in being provided more detail being provided on the view from the Performance Assurance Committee that this level of reporting is essential at the commencement of this new process.	approach, which we have summarised in the document 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'. At their meeting in November, the Performance Assurance Board, Committee Members supported the adjustments made (set out in the updated guidance document) in response to Party feedback. They noted that they are proportionate considering the reporting burden on REC Parties, whilst having the ability to diver deeper where the reporting indicates any issues. Further details of items presented at the PAB, can be found in PAB meeting minutes, where publicly available.
ScottishPower Energy Retail Limited (Energy Supplier)	In line with our response to the party impact assessment and this consultation, we do not agree with Dependency R0155.D003, set out in the Change Report, that PA reporting for R0137 and R0155 are or should be linked. We see no compelling rationale that any eventual PA reporting for one proposal should influence that for the other. Separately, we note that the PARC extract provided as part of the draft legal text refers to the new proposed report as "1451" and "1541" at different points, whereas we presume that only one report number would in fact apply.	Thank you for your response. R0155 and solution for R0137A/R0137 are being treated as separate and no longer have linked reporting. PARC requirements are detailed in the updated guidance document titled 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'.

SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Not at this time.	Thank you for your response.

4. Questions on the Additional Guidance Documents

Question 1:	1 Do you have any comments on the 'R0155 Change of Occupier: Evidentiary Standards and Timescales – Guidance Document'?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	We do not support the inclusion of a further list of additional documents that may be requested by suppliers to support a change of tenancy request within the guidance. Although as stated above, this is not a mandatory document, we believe that this further complicates the approach and is at odds with seeking to create a process that aids consistency and supports simplicity with respect of a change of tenancy request. We fully support the process of ensuring that suppliers are held accountable for following the process laid out in the Schedule. On this basis, we are concerned that within the guidance there is no information included to ensure that suppliers are aware of the consequences of non-compliance with either the process or their reporting requirements.	Thank you for your response. Please see the Code Manager's comments to your response in Section 1 Q1. The REC disputes process is available and can be used by Parties as a method to flag any non-compliance, including related to R0155.
British Gas (Energy Supplier)	We have no comments relating to the 'Evidentiary Standards and Timescales – Guidance Document', other than what we have previously commented on relating to the use of SDEP being a mandatory part of this change and the PARC requirements.	Thank you for your response.

	We feel that this document is a useful aid for suppliers to use to support any operational changes being implemented and welcome that this is non exhaustive.	
Brook Green Supply Limited (Energy Supplier)	We believe it is worth including the list of evidentiary documents included in the schedule (e.g. lease agreement) in this document also. This is to avoid any ambiguity or confusion, and reduce the amount of documentation a party would need to reference to make a decision on what evidentiary documentation to submit alongside the CoO.	Thank you for your response. The Code Manager has updated the Guidance Document with your suggestion.
Business Energy Direct (UK) Ltd (Third Party Intermediary)	RECCo needs to ensure that the guidance is accurate and stands up to legal scrutiny. “Examples of what might not be a COO may include change of registered business premises, change of legal status (for example from private company to PLC, PLC to private company, partnership to limited company), change of director, change of name but not change of owners, use, or address. If a partnership becomes a limited company (or vice versa), then that IS a change of legal entity and as such a legitimate COO which needs to be actioned upon request. We believe that the categories for additional documents need to be reviewed. A Mortgage agreement and a TR1 form are very similar from a legal position (and would refer to property owner, rather than exclusively an occupier) – yet these have been classified differently and we believe that these should be under the same category.	Thank you for your response. The Guidance Document was drawn up with support from the REC legal adviser.

	We cannot understand why Tenancy at Will and early access agreements have been classed under the description of “Other documentation”. “The different types of documentation were discussed in workgroups and it was noted that while useful as additional evidence, that they did not always confirm occupancy and as such were seen as higher risk”. Both documents enable access to occupy the property and are legally designed to allow the occupancy of a property outside of the completion of a lease. As such, they absolutely ARE evidence of the party that occupies the property and both are often used prior to the signing of a lease, so must be treated as lease would (for the purpose of establishing the party responsible for paying energy charges). What doesn’t seem to be explained yet, is what could be deemed a “duplicate request”? For example, a supplier may receive two valid COO notifications, one from the incoming, and one from the outgoing party. A supplier should communicate with both parties, however any documentation provided by the incoming party (or the party that notifies of the COO second) could be rejected, and even though both parties need to be kept informed, a supplier could refuse to complete a COT until the incoming party satisfies the criteria, despite the outgoing party already confirming they have ceased responsibility. We would also like to know what happens in the circumstances where a supplier refuses to process a COO and the customer doesn’t have the option to raise a complaint case with the Energy Ombudsman?	The Guidance Document has been updated to include give examples of a duplicate request. This will be a contractual dispute between the Energy Supplier and the Consumer. Energy Suppliers do not have to draft their supply contracts to end on a Change

		of Occupier. Where the contract does not end, the Consumer remains bound by the contract. Any dispute concerning the supply contract terms would be a normal contractual dispute outside the REC.
Citizens Advice (Consumer Advocate)	No response.	Thank you for your response.
Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	We have no comments on the guidance document.	Thank you for your response.
Ecotricity (Energy Supplier)	To have a standardised process across the industry with a prescribed list of industry guidelines would benefit the industry and the customer experience. In addition to this we believe it would be beneficial to include examples/rules of the documents required to advise on what 'good' looks like.	Thank you for your response. The Working Group agreed it for individual to decide what processes they wish to follow. The Code Manager notes that there are already industry forums established for this. For example via Energy UK.
EDF (Energy Supplier)	No comments.	Thank you for your response.
ENGIE (Energy Supplier)	No comments.	Thank you for your response.
ICoSS (Trade Body)	We have no comments on the guidance documents.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	While we appreciate efforts in general to provide relevant guidance, we believe that several points on the draft guidance document as part of this proposal should be addressed. First, the audience of this guidance document should be clarified. At points, it appears addressed to individual consumers and, at others, it appears addressed to suppliers. Given the Code is inherently addressed towards industry stakeholders and its processes and	Thank you for your response. The REC, including the Guidance Document, is not limited to use by REC Parties. It is a Plain English document that is available to all, including Consumers. As such, it also includes

	functions are of a technical nature, we do not consider it likely that a document of this kind would be applicable to consumers directly or that it would find a wide audience with them. Second, the guidance covers a range of matters which are not within the remit of the Code, RECCo or the Code Manager, but which are instead within the remit of Ofgem and the Energy Supply Licences. Yet, the guidance document currently makes no mention of Ofgem and makes only one brief reference to the supply licences. We believe it is optimal for guidance on matters within Ofgem's remit to come from Ofgem – particularly if such guidance is addressed to individual consumers. Should this guidance document ultimately be published, we believe that it should make clear and sufficient references to Ofgem, the supply licences and any guidance issued by Ofgem.	reference to areas out with the scope of the REC, as it is not only intended for Suppliers so has provided information on all regulations impacting the CoO process, but that may also be of interest to Consumers in line with the REC objective of ensuring Consumer's interests are protected.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Page 9 – First bullet point should be amended to – *Energy Suppliers have 10 Working Days from receipt of the documentation to accept the CoO request, reject the request (for example if it is a duplicate request) or confirm why documentation has been queried and what additional documentation is required* Clause 7 – Should a switch take place with a CoO, the CoO flag should be mandated, therefore we do not agree with this statement. Page 10 - *If the Gaining Supplier decides the Switch should continue, then they must use the Secure Data Exchange Portal (SDEP) to facilitate the sharing of the CoO evidence with the Losing Supplier* Page 11 - *The Losing Supplier must confirm the decision via the same SDEP screen*	Thank you for your response. The Code Manager has updated the Guidance Document with your suggestions. The document list has been copied to the guidance document, it has not been moved as the main list is part of the Schedule and the REC Change Process

	Page 11 - *The Losing Supplier must also communicate with the Consumer that they have a live billing account ~~with to~~ and set out the reasons for their rejection and what, if any, additional steps are required.* Appendix should be moved to the guidance document	

Question 2:	2 Do you have any comments on the 'Updates of the Performance Assurance for R0155 – Change of Occupier: Evidentiary Standards and Timescales' supplementary guidance document?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Beer & Pub Association (Trade Association)	We fully support a process that ensures suppliers are held accountable for following the process laid out in the Schedule. On this basis, we are concerned that there is no information included to ensure that suppliers are aware of the consequences of non-compliance with either the process or their reporting requirements.	Thank you for your response. Energy Suppliers will have Performance Assurance Techniques (PATs) applied to drive improvement in performance, where required. Reporting will be monitored, and the PAB will engage with Energy Suppliers, and apply the PATs, if non-compliance occurs.
British Gas (Energy Supplier)	As stated in our previous responses related to performance assurance, we feel that both the PARC and the supplementary guidance document are onerous for this change and extend beyond the remit that REC has to request this level of data. Providing this MPXN level data to the RECCo was a concern that we raised during the Impact Assessment and through direct engagement with RECCo, due to lack of clarity around the authority the Retail Energy Code has to request data. As the reporting catalogue required submission of data at an MPXN level, our concerns remain over the controls that are in place to ensure customer data is held compliantly and securely. We note that ''The Code Manager considered only tracking aggregate data that would then enable regular sample checking of an Energy Supplier's compliance in detail, however the PAB preferred the ongoing monitoring approach.'' This preference from	Thank you for your response. Following engagement with the REC PAB, the Code Manager has updated the assurance approach, which we have summarised in the document 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'. This updated guidance document providers details on the justification behind the approach proposed.

	the PAB was provided on the 30th of July 2024, prior to the impact assessment being issued and parties views being sought. We also note, as per this guidance document that the PAB requested a 'data led' and ongoing monitoring' approach. The detail set out in the PARC and the guidance document goes beyond this, with compliance monitoring being possible to be achieved with data provided at an aggregated level. Also to note, our contract manager had reached out to RECCo to raise concerns arounds this. The response provided was they, '' wanted to be transparent and assure you that we have not deviated from the intent of reaching a pragmatic and proportion solution, and to apologies for any confusion that be caused by the outcome of the Panel discussion in the meantime.''	
Brook Green Supply Limited (Energy Supplier)	Point 6 of section 4 relating to reporting requirements – please see comments in previous section regarding aggregated data.	Thank you for your response.
Business Energy Direct (UK) Ltd (Third Party Intermediary)	We believe that RECCo should have made more of an effort to review data it possesses and also engage with the Energy Ombudsman to understand how many complaints individual suppliers had raised against them regarding COO issues and where the suppliers have been found not to follow a suitable or logical COO process (i.e. Energy Ombudsman determine that the COO should have been actioned by the supplier) which has caused detriment to the end user. We are not aware of whether Energy Ombudsman currently provide data to RECCo, but it would be good practice to ensure that such relevant information is obtained from both suppliers directly and Energy Ombudsman (to ensure suppliers are providing information correctly to RECCo).	Thank you for your response. We currently do not receive information from the Energy Ombudsman as part of the REC Performance Assurance. The Code Manager how best to take this forward separately to this change.

Citizens Advice (Consumer Advocate)	No response.	Thank you for your response.
Drax Group plc (Drax Energy Solutions and Opus Energy) (Energy Supplier)	We have no further comments beyond those outlined in our responses to the questions in section 4 on the Performance Assurance requirements.	Thank you for your response.
Ecotricity (Energy Supplier)	• The supplier will be exposed if there is no provision or acknowledgements in relation to debt given these customers will be on deemed rates and can switch away. • The level of Change of Occupier that are submitted which are potentially fraudulent, raises concerns that could put a supplier at risk of the requirements for bad debt write off in their determination of a potential fraudulent Change of Occupier. • Back dating of Change of Occupier and time limits requires further guidance to also protect suppliers. Providing guidance relating to time limits / constraints would support suppliers to create consistency across the industry. • Improved guidance on Change of Management Agency as these see similar issues to the above point.	Thank you for your comments. The concerns will be reviewed and considered by REC Performance Assurance as part of the Final Recommendation. Since the consultation was issued, the Code Manager has updated the Performance Assurance approach, and the supplementary guidance document on Performance Assurance. Please see the document titled 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2', for details and guidance on this updated approach.
EDF (Energy Supplier)	Yes. We do not support the performance assurance requirements set down alongside this consultation. As we commented in response to the Impact Assessment, the reporting requirements are overly granular and disproportionate to RECs needs to monitor compliance. We note that the inclusion of a TPI identifier is wholly unnecessary. Suppliers are bound by the proposed schedule, not TPIs, and the conduct of TPIs is a separate issue which is not	Thank you for your response.

	captured within the enforcement scope of this process, or within the core objectives of the PAB. Additionally, we note the dependence on CP R0137/A. We expect this change will be delayed, and subsequently abandoned as a result of the outcomes from DESNZ' regulating TPIs consultation. We have provided comments on R0137/A separately. However, we note REC has subsequently brought a revised approach to performance assurance to the PAB (25/11) - RECPAB_24_1126_01. This new proposal represents a more pragmatic solution. However, more detail is required to support an informed decision. We broadly support the new approach of monitoring of process initiation and sampling of performance, provided the opportunity is made available for relevant suppliers to contribute to a terms of reference document to govern how these measures are conducted. This will be crucial to ensuring the checks are proportionate and effective.	The TPI identifier has now been removed. The Code Manager has revised the Performance Assurance approach. This is further detailed in the updated guidance document titled 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'.
ENGIE (Energy Supplier)	We do not believe this document is necessary as we do not support the implementation of the proposed reporting regime for the reasons outlined in Section 4.	Thank you for your response.
ICoSS (Trade Body)	We have no comments on the guidance documents.	Thank you for your response.
ScottishPower Energy Retail Limited (Energy Supplier)	We believe it is important that the Code Manager provide greater clarity on the current position of the Performance Assurance Board (PAB) in relation to the proposed PA requirements under this proposal – or, indeed, for the PAB to do so directly – given the reliance which the Code Manager has placed on a particular meeting of the PAB for both MPxN-level reporting and the	The Code Manager has revised the Performance Assurance approach. This is further detailed in the updated guidance document titled 'Updates on the Performance Assurance of R0155 –

	"qualification" review. In that respect, the Code Manager references, in the Change Report and its additional document on Performance Assurance, a meeting of the PAB on 30 July 2024, at which this Change Proposal was discussed. In its additional document, the Code Manager states that, in that meeting: *"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."* However, the minutes from that meeting state that "a PAB member" (ie a single member of the Board) expressed "value in conducting assurance at the time of implementation". The minuted decision is that the PAB "NOTED the contents of the update and provided views to the Code Manager on the preferred options". Notably, the minutes do not record that the PAB approved a particular proposal. In addition, this meeting took place in July; the party impact assessment was published in August and the consultation and the additional PA document were published in November. The scope of the Code Manager's proposed requirements were only published at the impact assessment stage and detailed at the consultation stage. Given the significant departure from existing practice which the Code Manager has proposed for the PA requirements for this Change Proposal, particularly on the "qualification" review at/before	Change of Occupier: Evidentiary Standards and Timescales V2'. The Code Manager presented the revised approach to the REC Performance Assurance Board on 26 November 2024. The Change Report has also been updated to provide the details of the updated approach.

	implementation, clarity on the PAB's current view would be beneficial. Elsewhere, we note that the Code Manager, in its additional document, lists Retail Risk II (Retail market processes are not effective or efficient, including the incomplete or inaccurate updating of REC data.) and Retail Risk III (Consumer interests and data are not protected in the operation of the REC.) as relevant to this proposal. However, in line with our response to this consultation, we are not convinced that Retail Risk III is, in fact, applicable to this proposal or its subject matter. Having reviewed the risks identified by the Code Manager in its additional document, we have set out proposed amendments to them in the table below, to ensure that the risks are as relevant as possible. We propose that the monitoring approach set out in the Code Manager's additional document be revised in line with the proposed amendments to the risks set out in the table above, where applicable. **The Code Manager is unable to paste the table provided by ScottishPower without corrupting the document, but it has been received and reviewed.**	The Code Manager has provided further details on the Retail Risks applied, and the reasoning behind these, in the document titled 'Updates on the Performance Assurance of R0155 – Change of Occupier: Evidentiary Standards and Timescales V2'.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	None that haven't already been covered in other responses.	Thank you for your response.