RETAIL ENERGY CODE

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01	Initial Assessment Report
02	Preliminary Change Report
03	Final Change Report

CHANGE REPORT

R0157 – REMOVAL OF FACSIMILE AS A METHOD OF CODE COMMUNICATION

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DEADLINE FOR ALTERNATIVE CHANGE PROPOSALS	09/02/2024

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CHANGE OVERVIEW

The Public Switched Telephone Networks (PSTN) will be switched off in December 2025 by all telecom companies and will be replaced with an Internet Protocol (IP) digital network, resulting in fax machines becoming obsolete. Retail Energy Code (REC) communication methods referencing fax or facsimile will need to be removed and replaced with electronic mail (email) (where this is not an existing option), unless an alternative form of communication is needed, and this will also provide the REC an opportunity to standardise references to electronic mail.

	High Impact: N/A
	Medium Impact: N/A
	Low Impact: Energy Suppliers Metering Equipment Managers Data Collectors Green Deal Providers Green Deal Finance Parties

RESPONSIBLE COMMITTEE DECISION

On 19 March 2024, the Change Panel voted to **APPROVE** R0157 for implementation in the REC's **November 2025** Release.

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RETAIL ENERGY CODE

BACKGROUND

1 SUMMARY

The REC provides multiple communication methods for different functionalities, including in some cases the use of facsimile (more commonly, and hereby, referred to as fax). Fax, as a method of Code Communication, relies on PSTN to provide residual power and data transmission capabilities for fax machines devices.

However, following an Office for Communication (Ofcom) consultation, and the decision to introduce a new IP Digital Network, Ofcom have confirmed that telecoms providers will no longer be required to provide fax services to their customers. Telecom providers are currently in the process of switching off their PSTN that fax relies on, and this means that fax users will need to look for alternative methods of communication, such as electronic mail (email).

By December 2025, Telecom providers will complete the migration to the new IP Digital Network. This will mean fax will become obsolete as a method of communication, including within REC operations and will have to be removed.

Currently, there are no instances within the REC where fax is the only communication option. In all cases where fax is provided as a method of communication, either one, or both of, email and post are listed as alternative options. Both email and postal options will remain as methods of Code Communication for all parties. This forms the basis of the fully formed solution that is provided with this change.

Additionally, in REC documents and products, there is not a standardised approach to referencing electronic mail, with both “email” and “e-mail” being used interchangeably. This means that is difficult to complete accurate searches relating to electronic mail within the REC. To make such searches easier for Market Participants, this change provides an appropriate opportunity to standardise any outstanding references, at the time of implementation, by replacing “e-mail” with “email.”

Since email is already provided as an alternative method of Code Communication, the solution does not need to insert a new method of Communication into any part of the Code. The proposed solution simply removes all outstanding references to “fax,” “facsimile” and “facsimile transmission” and replaces any uses of the word “e-mail” with “email.”

The Code Manager has completed a Code review and has compiled a list of all current references to fax or ‘e-mail’ found in the Code that will be removed or amended as the proposed solution. The list also contains the Document, Clause and/or Product in which the reference is found. This list, which is the basis for the fully formed solution, can be found here.

2 PROBLEM STATEMENT

The Public Switched Telephone Networks (PSTN) will be switched off in December 2025 by all telecom companies and will be replaced with an Internet Protocol (IP) digital network. Existing fax machines that are incompatible with new all IP digital networks will become obsolete and no longer capable of meeting Code Communications as prescribed in the REC.

REC participants will need to switch to digital technology, in this case email, which is compatible with the new IP digital networks, to ensure the continual transmission of information that may currently be transmitted by fax.

In addition, the Code Communications prescribed in the REC currently does not have a standardise reference to email within REC documents, with both formats of electronic mail ("email" and "e-mail") being used interchangeably. This is preventing accurate results being presented in document searches.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As a Consumer, I want to have confidence that my energy supplier can operate efficiently in the energy market.
MARKET PARTICIPANT USER STORIES	
M1	As a Market Participant, I want to be able to share and communicate information with other Market Participants.
M2	As a Market Participant, I want to be able to use new, and futureproofed, technology to support my business and customers.
M3	As a REC Party, I want to ensure I maintain compliance with contractual Code Communication obligations.
M4	As a REC Party, I want to be able to be confident that all accurate results are returned in REC document searches.

PROPOSAL

4 PROPOSED SOLUTION

The proposed solution is to remove any outstanding references to Facsimile/Fax, including any additional phraseology such as "transmission" in "facsimile transmission," in REC Documents and standardise references to electronic mail by replacing any outstanding uses of "e-mail" with "email", at the time of implementation.

In all circumstances where Fax is listed as a Code Communication option, email (and in some circumstances, post, or telephone) is already provided as an alternative method of Code Communication. Therefore, the proposed solution does not include inserting a new, alternative method of Communication into any part of the Code to replace Fax.

Further details on where there are references to Facsimile, Fax, or "e-mail", that will be amended or removed as part of this proposed solution, can be found here.

4.1 DATA ITEMS AND MARKET MESSAGES

As part of the industry consultation that followed the Preliminary Change Report, market participants were asked if they believe these data items, particularly DI50237 (J0491) as part of Market Message MM00236 (D0302) Notification of Customer Details, should be removed as part of the solution, and if so how.

After consideration of these responses (with a full summary of responses provided in section 9 of this Final Change Report), the Code Manager recommendation does not seek to remove the data items referencing fax/facsimile as part of the proposed solution for R0157, as the associated DI50237 (J0491) data item is an optional data item in the D0302 and therefore not essential to the change. The D0302 is being updated under the Market Wide Half Hourly Settlement (MHHS) programme and therefore implementation of R0157 including data item removal is not appropriate in similar timescales. The costs of doing so, and the financial and operational impact on impacted REC participants to test and deploy systems at this stage, are also not justified.

Instead, the Code Manager proposes that the data item DI50237 (J0491) is removed via a future next change to the MM00236 (D0302), after the implementation of R0157. Thus, keeping the solution to this change as a legal text change only.

The Code Manager believes this to be the most suitable solution, which is the most cost-efficient option and prevents any unneeded disruption to the MHHS programme and implementation. As the impacted data item is optional, and with the PTSN being switched off making the use of fax machines obsoletes, we do not consider there to be a risk of personal data needlessly being shared in the industry as such personal data will no longer be used and/or accessible when fax machines become obsolete.

Removal of the items via a future change, post implementation, will also ensure that the REC remains as concise as possible once fax is legally no longer a method of code communication, whilst keeping risks, costs and impacts to a minimum.

4.2 MARKET WIDE HALF HOURLY SETTLEMENT

DESIGN	DATA SPECIFICATION	DRAFTING
No impact – there is no reliance on facsimile in the MHHS Design.	The proposed solution does not seek to make any changes to the data items referencing fax at the point of implementation. These will be addressed in a future change. Therefore, there will be no data specification impact, which would affect MHHS, as part of this proposed solution.	The legal drafting has been reviewed against the REC MHHS code drafting. Although the REC products impacted by R0157 are also impacted by MHHS code drafting, impacts are indirect and therefore impact the baseline text only.

5 DRAFT LEGAL TEXT

The legal text makes the required deletions, and standardisations, to the relevant REC Products and Documents, including all references to fax, facsimile, and any relevant and subsequent phraseology.

The draft legal text changes to deliver the proposed solution to R0157 can be found here.

Please note that the clause number as part of the proposed changes to Schedule 14 – Metering Operations, may be altered because of the MHHS programme. However, the MHHS design will not alter the legal text that will be changed.

6 DELIVERY AGAINST CHANGE PROPOSAL PLAN

To date, all activity has been completed within the planned timescales.

The Change Proposal Plan can be found here.

7 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

7.1 RISKS AND ISSUES

No.	RISK	NOTES	MITIGATION
R0157.FCR.R001	Removal of Data Items DI50237 (J0491).	The D0302 is being updated under the Market Half Hourly Settlement (MHHS) programme and therefore implementation of R0157 including data item removal is not appropriate in similar timescales and could cause unnecessary risk to the implementation of the MHHS programme.	To mitigate against any risk to the MHHS programme, the Code Manager recommends that the data items are not removed as part of the proposed solution, but instead to remove the data items via a future change post implementation in November 2025. This has been formally recorded as a REC Issue under reference RI-055.

No.	ISSUE	NOTES	HOW TO PROGRESS
R0157.PCR.I001	Data Item DI50237.	This is a data items for Fax Contact Numbers. As part of the change, they could be removed, however there is no firm requirement to do so, but this should be considered as doing so may affect the overall solution, create impacts for parties, and would affect the required lead time required for implementation.	The Code Manager included a question in the Consultation to ask REC parties if they believe the data items should be removed as part of this change, and if so how. Following consideration of the Consultation responses, the Code Manager has proposed the data item DI502357 to be removed post-implementation through a future change, as outlined in this Final Change Report. This has been formally recorded as a REC Issue with the ID RI-0055.
R0157.FCR.I001	Data Item DI92293 (XoS0281).	The REC also refers to the data item DI92293 (XoS0281) that also references fax. This data item is a data item owned by the Uniform Network Code, and therefore will be covered under the UNC's own modification 0864S, and not as part of the RECs R0157 change proposal.	This data item, and the possible removal or endurance will be addressed as appropriate following the outcome and conclusion of UNC Modification 0864S – Update of UNC Code Communication Method.

8 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	November 2025

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

The Code Manager proposes this change to be included in the REC's Standard November 2025 release. The precise date of this release is yet to be determined.

Subject to approval by the Responsible Committee, an update will be made to the Change Proposal Page on the REC Portal and REC Parties will be informed as soon as the exact date has been confirmed.

The proposed implementation date of November 2025 allows REC participants to continue to use fax as a method of code communication for as long as possible whilst telecommunications company continue to operate facsimile transmission and provides the maximum amount of time for REC participants to plan and prepare for the PTSN switch off.

A November 2025 implementation date will also ensure that any unforeseen impacts that this change may have against MHHS programme are avoided and provides a timeframe that will provide the greatest possible opportunity for the REC to align change timetables and co-ordinate with all other codes who are affected by the PTSN switch off.

9 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 09 February 2024 to obtain views on the Preliminary Change report. In total two responses were received from an Energy Supplier and a Metering Equipment Manager (MEM). The responses have been consolidated and comments provided by the Code Manager. This can be found here.

The key themes from these responses have been summarised and set out below.

9.1 SUMMARY OF RESPONSES

9.1.1 COMMENTS ON THE SOLUTION AND LEGAL TEXT

The consultation respondents agreed that the proposed solution resolves the problem statement. No further comments, or suggestions, were made concerning the draft legal text that forms the solution.

9.1.2 COMMENTS ON POSSIBLE REMOVAL OF DATA ITEMS

We received mixed feedback on whether the optional data items containing reference to fax/facsimile should be removed as part of the solution to this change. One respondent stated that the data items referencing Contact Fax Number should be removed, noting that this should be the normal course of action to ensure that the REC documentation remains as concise as possible, and were happy to take the REC's [Code Manager] guidance on how this should be conducted.

However, another responded commented that as it is an optional field, removing the data items would cause more work and the cost to implement the solution this was due to the need to develop, test and deploy on their systems. The respondent also noted concerns that the change would then be considered as affecting the MHHS Programme and may cause a delay in the full implementation date to prevent increased development during the MHHS Qualification period on both the new and legacy systems.

9.1.3 IMPACTS RELATIVE TO IMPLEMENTATION AND OPERATIONAL COSTS

Neither respondent believed that the proposed legal text solution would have an impact on their operational processes. Neither respondent said they expected any financial impact as a result of the proposed solution, however the Metering Equipment Manager noted that if changes to the data items (and MM00236 (D0302)) are approved, then they would incur a cost to develop, test and deploy on all their MM00236 (D0302) receiving systems.

9.1.4 IMPLEMENTATION APPROACH AND DATE

One respondent agreed with the proposed implementation date of November 2025. Another respondent, whilst having no objection to the proposed implementation date, stated that they do not see any reason this change could not be implemented earlier than the proposed date.

10 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

The Code Manager has not made any amendments to the proposed solution, nor the legal text, following consultation. However, the Code Manager has clarified the positioning around any data items that reference fax and proposes a separate housekeeping change be raised after the November 2025 implementation, and the PTSN switch off, to remove these data items, as explained in section 4.1 of this Final Change Report.

11 BUSINESS CASE ASSESSMENT

11.1 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
All Portal Users	R0157 will ensure that all searches of terms and processes in EMAR Digital REC and Data Specification will return all appropriate, and accurate results.
All REC Parties	R0157 ensures that the methods of Code Communications in the REC are futureproofed, using the latest technology to support businesses efficiently share and communicate information with other market participants.

11.2 COST BENEFIT ANALYIS SUMMARY

This is a legal text change that market participants are already aware of and there are no costs associated with the implementation of this Change.

12 CASE FOR CHANGE

12.1 SELF-GOVERNANCE

The Code Manager considers that there is a case for change to implement this Change Proposal, on the basis that:

- the proposed solution is fully formed and appropriately resolves the problem statement;
- this Change will appropriately align and engage with, and respond to, the outcomes of other Code Changes within the energy industry;
- without implementation of this change, the REC risks using outdated communication methods that may prevent the required and accurate sharing of information between parties; and,
- a positive business case can be made, as set out in section 11 of this Final Change Report.

13 CODE MANAGER'S RECOMMENDATION

The Code Manager recommends that the Change Panel:

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

14 RESPONSIBLE COMMITTEE DECISION

This report was discussed at the REC Change Panel meeting on 19 March 2024.

The REC Change Panel voted to:

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

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED CONSULTATION COMMENTS AND CODE MANAGER'S RESPONSES	Link
ANY OTHER DOCUMENTS / LINKS	Updating the UK to Digital Phone Lines - Open Reach (Energy) Industry Factsheet

16 GLOSSARY

TERM	DEFINITION
Facsimile (Fax)	means the machine that receives, and processes the sending of, an exact copy of a page of text or images to a recipient using telephonic transmission.
Internet Protocol Digital Network	is the basis of most modern digital communications and means the process in which the internet layer communications define addressing systems to identify network hosts and to locate them on a particular network, allowing the routing of information between two separate locations.
Market Message	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
Market Participant	means a participant in either or both of the gas and electricity markets of Great Britain, each of which is identified by a Market Participant Role.
Public Switched Telephone Network (PSTN)	means the network in which traditional telephone systems used for voice orientation communications operate through and is a combination of telephone networks used worldwide, including telephone lines, Fiber Optic cables, switching centres, cellular networks, satellites, and cable systems.