RETAIL ENERGY CODE

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

INITIAL ASSESSMENT REPORT

R0157 – REMOVAL OF FACSIMILE AS A CODE COMMUNICATION METHOD

DOCUMENT VERSION	V1.0
DATE ISSUED	30/01/2024
DOCUMENT APPROVAL STATUS	APPROVED

RESPONSIBLE COMMITTEE	CHANGE PANEL	CHANGE PATH	SELF GOVERNANCE
PRIORITY STATUS	MEDIUM	URGENCY	STANDARD

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

1 BACKGROUND

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.

Also, 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 references 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 references to fax (and facsimile) 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, that 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.

4 IMPACTS

REC PARTIES AND SERVICE USERS
Energy Suppliers
Metering Equipment Managers
Data Collectors
Green Deal Providers
Green Deal Finance Parties

REC DOCUMENTS / PRODUCTS
Schedule 14 – Metering Operations Schedule
Schedule 18 – Green Deal Arrangements Schedule
Consolidated Metering Code of Practice (CoMCoP)
Data Item Catalogue
Standards Definition

REC SERVICE PROVIDERS
Electricity Enquiry Service

CONSUMERS
Gas
Electricity

The Code Manager has completed a review of the Code to find all references to fax, with at least one reference that will have to be removed in each of the Documents or Products listed above.

The code manager has listed the rec parties, service users, service providers, who engage with the documents and products and who may be impacted by this change. In all circumstances email is already provided as an alternative method of code communication, so the impact of this change will vary on a party-to-party basis dependent on their degree of fax use.

5 CROSS CODE IMPACTS

This is not a cross-code change, however all other codes (BSC, DCUSA, SEC, UNC, and IGT UNC) are affected and are raising the relevant changes needed. The Cross Code Steering Group (CCSG) will need to co-ordinate change planning timetables for industry engagement. However, whilst there is a preferred approach from the CCSG to co-ordinate change planning timetables, this is only a preferred approach and is not essential to the success of the implementation of this change.

6 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	Self-Governance	RESPONSIBLE COMMITTEE	Change Panel

This is a Self-Governance change that the Code Manager recommends the Responsible Committee to be Change Panel.

Since this Change Proposal will have an impact to multiple REC Documents and Products that are governed by a range of Responsible Committees as set out in the REC Baseline Statement, in line with common practice, the Code Manager therefore proposes that the Change Panel is the Responsible Committee for this change.

7 PRIORITY STATUS AND URGENCY

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	1	25	25
	Retail Markets Impact	Retail Risk(s)	1	15	15
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	5	10
		Legal and Regulatory Compliance	1	13	13
Resource	Complexity / Effort / Duration		1	8	8
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	15	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity (High Priority activity)	2	20	40
				Overall Priority Score (rounded)	118

This change has been provided an Overall Priority Score of 118, and a Priority Status of Medium. This is driven by the impacts to Operational Effectiveness and Efficiencies, and the urgency of this Change Proposal to allow for regulatory and operational readiness for this change.

On Impacts, Resource, and Alignment with the objectives of the REC, all items except for Operational Effectiveness and Efficiencies scored 1. This is due to the fully formed solution containing an existing method of code communication, that is already widely used, rather than inserting a new method of Code Communication. Since an alternative to fax is already in place, the removal of fax will have minimal impact on parties and resources.

Operational Effectiveness and Efficiencies has been scored 2 to reflect the importance of ensuring effective transmission of information to allow the Retail Energy Market to function appropriately, and for REC parties to effectively communicate with each other.

Urgency has been scored a 2 to reflect that there is a deadline of December 2025 for the PTSN being switched off that will impact Code Communications Methods. Urgency has also been scored a 2 due to the need to proceed and implement this Change Proposal prior to the PTSN switch off date, to allow time for REC parties to ensure regulatory readiness and compliance for any communication changes.

8 SUMMARY OF CHANGE PROPOSAL PLAN

As there is already a fully formed solution for this Change Proposal, this Change will proceed straight to Preliminary Change Report (PCR).

A 10 Working Day Consultation will be issued alongside the PCR on 09 February 2024.

If approved at the Responsible Committee Review on 20 February 2024, the Final Change Report will be issued 12 March 2024 ahead of a Responsible Committee Review at the Change Panel on 19 March 2024.

The Change Proposal Plan can be found in the table below.

	FROM	TO
PRELIMINARY CHANGE REPORT AND CONSULTATION ISSUED	09/02/2024	09/02/2024
CONSULTATION	09/02/2024	23/02/2024
FINAL CHANGE REPORT ISSUED	12/03/2024	12/03/2024
RESPONSIBLE COMMITTEE DECISION	19/03/2024	19/03/2024
APPEAL WINDOW CLOSURE	02/04/2024	02/04/2024

9 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 different locations.
Public Switched Telephone Networks (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.