RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

# NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

## R0168 – CLARIFY & STRENGTHEN CRS PROVIDERS REQUIREMENTS

On 13 December 2024 the Code Manager issued a consultation to industry to seek feedback on the Change Report (for consultation) for R0168.

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

| | |
|---|---|
| **DOCUMENT VERSION** | 1.0 |
| **RESPONSE TYPE** | **NON-CONFIDENTIAL** |
| **DATE ISSUED** | 20/01/2025 |
| **RESPONSIBLE COMMITTEE** | Change Panel |
| **LEAD ANALYST** | James Hardy |

| | |
|---|---|
| **DATE CONSULTATION ISSUED** | 13/12/2024 |
| **RESPONSE DEADLINE** | 17/01/2025 |

| Question 1: | Do you agree with the proposed solution? If not, please provide rationale. | |
|---|---|---|
| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| Smart Data Communications Company (DCC) | Broadly yes, with the caveat that DCC has made several suggestions regarding the REC legal text and Best Practice document. DCC has been involved in R0168 from the outset and has collaborated extensively with the Code Manager to ensure that the proposed solution and Best Practice document are fit for purpose. You will find in our subsequent responses and attachment that we have identified areas where we feel it is beneficial to make further amendments. If required, DCC will be happy to discuss this response with the Code Manager.<br><br>DCC notes that T009, which *seeks to review, and assess, the data captured as part of a Switch, or otherwise, to help prioritise in the event of a Major Switching Incident. This recommendation has been considered in conjunction with IM20 that states that the Switching Operator should consider the potential to identify and prioritise certain customer groups impacted by a Major Switching Incident* appears to be excluded from the Best Practice document. DCC advises that in order to implement prioritisation of subsets of switches, system changes are likely to be required with an associated cost. | Thank you for your response and your engagement throughout the R0168 change process. The Code Manager will reach out to the DCC should we require to discuss your response further.<br><br>Noted. Thank you for your response. The Code Manager will review the inclusion of T009 in the Best Practice document prior to the publication of the R0168 Change Report (Final Recommendation) |
| National Grid Electricity Distribution (Distribution Network Operator) | Yes. | Thank you for your response. |

| | | |
|---|---|---|
| Scottish Power Energy Networks<br>(Distribution Network Operator) | Yes | Thank you for your response. |
| ScottishPower<br>(Energy Supplier) | R0168 proposes to address eight RECCo review report recommendations as part of this Issue, with each of the recommendations providing a set of requirements that the proposed solution should ensure in addition to the problem statement.<br><br>We agree with all recommendations and the requirements, but we have comments on:<br><br>**T009 - Data captured as part of a Switch, or otherwise, to help prioritise in the event of a Major Switching Incident** - We agree with the recommendation that should a Major Switching Incident occur in the future, the Switching Operator engages with the impacted Switch Parties (i.e., Energy Suppliers, SDSPs) to identify, Impacts and priorities – i.e., individual switches that they believe require prioritised processing, and the rationale why. But the Switching Operator could also use the switching data to see if the customer has provided a switch date or not, where no date is provided, those switches will be expected to go through the faster switching timescales and therefore should be prioritised over the customers with the future dated switch to reduce the customer impact. | Thank you for your response. The Code Manager will further consider your comments regarding T009 ahead of the publication of the Change Report (Final Recommendation). |

| Question 2: | Do you agree with the proposed legal text drafting for Schedule 26 – Switching Service Management, the Switching Operator Service Definition and the CSS Service Definition? If not, please provide rationale. | |
|---|---|---|
| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| Smart Data Communications Company (DCC) | DCC agrees in principle with the amendments to the three REC Schedules, however we would like to provide the following feedback:<br>• DCC notes that the intention of this Change Proposal is to introduce a 'best practice' document, however **CSS Service Definition Paragraph 5.3**, **SO Service Definition Paragraph 5.4** and **Schedule 26 Switching Service Management Schedule Paragraph 2.23** state that the DCC 'must adhere to' the Switching Operator Major Switching Incident Best Practice document. This would appear to obligate DCC to fully comply with what is intended to be a 'best practice' document, which is at odds with the proposal. DCC recommends investigating the use of a term such as 'refer to', 'all reasonable steps', and or 'best endeavours' as this may be more appropriate. This will allow DCC to have flexibility in its approach to handling a MSI that is to be resolved outside of SLA, as efficiencies may be identified.<br>• DCC recommends that the Code Manager investigates introducing a template to show how DCC has adhered to the Switching Operator Major Switching Incident Best Practice document. If in agreement, DCC recommends that this is introduced into the MSI timeline – i.e. *the template must be completed within X Working Days following resolution*. If this is | Thank you for your response.<br><br>The Code Manager will review the wording ahead of the Change Report (Final Recommendation). The Code Manager has already engaged with the respondent around these concerns and will continue to do so. The Code Manager is committed to ensuring there is appropriate flexibility to deal with the unique nature of Major Switching Incidents.<br><br>Thank you for your recommendation. The Code Manager will take this into consideration and update the Best Practice document to incorporate the instructions. If this is not included, the Code Manager will engage with the DCC to discuss how their |

| | | |
|---|---|---|
| | not agreeable, DCC seeks clarification on how it will be measured against the document.<br>• **Schedule 26 Paragraph 2.17** – DCC queries whether instead of the PAB, it should be a *named member of the PAB*, a *designated mailbox*, or *Code Manager*. Furthermore, DCC advises that a template for this action would be useful for records. The template could also contain the contact details so that the DCC knows exactly where to send the relevant information and vice versa. | actions will be measured from a Performance Assurance perspective.<br>Please see above comment on template inclusions. The Code Manager will review the noted contact in the proposed legal drafting to consider the most appropriate point of contact, whether this be PAB, the Code Manager, or another address. |
| National Grid Electricity Distribution<br>(Distribution Network Operator) | Yes. | Thank you for your response. |
| Scottish Power Energy Networks<br>(Distribution Network Operator) | Yes | Thank you for your response. |
| ScottishPower<br>(Energy Supplier) | Yes, we agree with the proposed legal text. | Thank you for your response. |

| Question 3: | Do you have any comments on the draft Switching Operator Major Switching Incident Best Practice Document? | |
|---|---|---|
| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| Smart Data Communications Company (DCC) | DCC has provided feedback on the contents of this document throughout its drafting, and as part of our response to this consultation, we have provided a 'marked-up' version of the Switching Operator Major Switching Incident Best Practice document for the Code Manager to consider.<br>The main themes are:<br>• The document proposes several new requirements on DCC, which would not currently be undertaken in the event of a Major Switching Incident (these have been flagged in the document). If these are to be carried forward, DCC would need to carry out an impact assessment of each new requirement.<br>• The legal text refers to the 'Switching Operator Major Switching Incident Best Practice document', however the title of the actual document is 'Major Switching Incident – Switching Operator Best Practice Document'. | Noted. The Code Manager will take these into consideration during the Final Recommendation.<br><br>The Code Manager will amend and correct this ahead of publication of the final draft of the Best Practice document alongside the Change Report (Final Recommendation). |
| National Grid Electricity Distribution (Distribution Network Operator) | No. | Thank you for your response. |
| Scottish Power Energy Networks (Distribution Network Operator) | No comments | Thank you for your response. |
| ScottishPower (Energy Supplier) | **1 What is a Major Switching Incident** –<br><br>*In compliance with REC Schedule 26 – Switching Service Management paragraph 2.12, "Where an issue is classified as a Major Switching Incident by the Major Incident Manager (MIM), the Switching Operator* | |

| | | |
|---|---|---|
| | *shall notify all Market Participants, the Code Manager, the Switching Service* ***Providers and all other interested parties as soon as reasonably practicable, via a Switching Portal bulletin****".* | |
| | During the P1 incident, we had several issues with receiving all communication from DCC. Establishing a dedicated group for Switching Parties which meets frequently during any Major Incidents is good. But we believe that a contact list for any Major incidents must be created and maintained by the Switching Operator. The contact list must be reviewed periodically to ensure it kept up to date. REC contact managers from each organisation should also be part of this contact list to ensure key messages during the Major incidents are not missed and circulated. | The Code Manager will review existing processes and consider the appropriate contacts to be contacted by the Switching Operator in line with good practice during a Major Switching Incident, and the appropriate procedures should a list be required to be updated. |
| | **1.1 – Impacts –** increase in customer complaints | Noted. Thank you for your response. |
| | **2.3 – Switching operator end – consumer communication** - In all cases where a Major Switching Incident impacts end Consumers, the Switching Operator should give consideration to providing industry-wide communications<br><br>1 . The Switching Operator will need to give consideration to (but not limited to) the following if it decides not to provide communications:<br><br>• Number of Metering Points impacted<br>• Number of CSS Users impacted<br>• Length of impact<br><br>Although, suppliers could get this information themselves by carrying out analysis, but we believe that information on number of switches <=5 WDs and Number of switches > 5 WDs would be useful during any major incident, for suppliers to understand the impact on the customers and potential customer complaints and calls to be managed. | Noted. Thank you for your response. |

| Question 4: | Do you agree with the Code Manager's Case for Change? If not, please provide rationale. | |
|---|---|---|
| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| Smart Data Communications Company (DCC) | Yes. As mentioned in our response to question 1, DCC has supported this change since its inception, and has supported its development throughout. The Switching Operator Major Switching Incident Best Practice document will provide additional structure to current processes in the case where an MSI occurs that cannot be resolved within SLA (noting our queries/proposed amendments). | Thank you for your response. |
| National Grid Electricity Distribution (Distribution Network Operator) | Yes. | Thank you for your response. |
| Scottish Power Energy Networks (Distribution Network Operator) | Yes, we are supportive of this change. | Thank you for your response. |
| ScottishPower (Energy Supplier) | The P1 incident had a significant impact on energy suppliers and their customers. We agree with the code manages case for this change as there is a clear need for improvement in the arrangements managing switching services and response to Major Switching Incidents. | Thank you for your response. |

| Question 5: | Do you agree with the proposed implementation date of 28 February 2025. If not, please provide rationale. | |
|---|---|---|
| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| Smart Data Communications Company (DCC) | Yes, provided that the contents of the Switching Operator Major Switching Incident Best Practice document is agreed by this date, DCC is happy for this Change Proposal to be implemented as part of the February 2025 release. Please note in our previous responses that if DCC is to comply with the new requirements as currently written, impact assessments will be required which would likely be completed after the implementation date. As such, depending on whether this is a best practice document or a document DCC must fully adhere to, DCC may have to seek derogations against those requirements. | Noted. Thank you for your response. The Code Manager will engage with the DCC following confirmation of any amendments to the contents of the Best Practice document, and the standing of the required adherence to the document by the DCC. |
| National Grid Electricity Distribution (Distribution Network Operator) | Yes. | Thank you for your response. |
| Scottish Power Energy Networks (Distribution Network Operator) | Yes | Thank you for your response. |
| ScottishPower (Energy Supplier) | Yes, we agree with the proposed implementation date. We believe that the sooner these improvements are implemented, it will give industry parties some assurance with guidance document being available and reducing any risks associated with any future Major Switching Incidents. | Thank you for your response. |

| Question 6: | Do you have any further comments on this Change Proposal? | |
|---|---|---|
| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| Smart Data Communications Company (DCC) | DCC notes that the DCC-owned Category 3 'Switching Operator - Incident Management Policy' will have to be updated if this Change Proposal is approved to ensure that the approaches captured in each document are aligned. | Thank you for bringing this to our attention. Should this Change Proposal be approved for implementation, the Code Manager will assist the DCC in making the required Category 3 change highlighted in your response. |
| National Grid Electricity Distribution (Distribution Network Operator) | No. | Thank you for your response. |
| Scottish Power Energy Networks (Distribution Network Operator) | No further comments | Thank you for your response. |
| ScottishPower (Energy Supplier) | As a result of the P1 switching incident, Suppliers had to pay GS payments. There should be some mechanism for the suppliers to recover the cost from the DCC. | This is out of scope of Change Proposal R0168. However, the Code Manager will share your recommendation with RECCo for further consideration. |