RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0225 CLARIFICATION ON TDIS PORTFOLIO TRANSFERS ON SALE

On 07 March 2025 the Code Manager issued a consultation to industry to seek feedback on the Change Report for R0225.

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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RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	23/04/2025
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Flo Monea

DATE CONSULTATION ISSUED	07 March 2025
RESPONSE DEADLINE	28 March 2025

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
ScottishPower Energy Retail Limited (Energy Supplier)	We welcome the proposal to provide clarity and a consistent approach for transferring TDIS market shares between parties following a portfolio sale. We also agree that the phrase “substantially all” could cause inconsistencies in determining the legal import or meaning in the context of what the schedule aims to achieve. However, we do note that Paragraph 3.8(b) makes reference to "final metering point market share", whereas the Code currently uses “final Metering/Supply Meter Point market share”. We suggest that the latter be adopted here, for consistency. We also note that the title of the annex quoted on the draft legal text document is “Annex 2 Theft Risk Assessment Service”; however, reading the text, the changes are meant to be effected in Annex 3 Theft Detection Incentive Scheme in Schedule 7 of the REC. We suggest this be amended, if required, so the intended benefits of the change are properly effected.	Thank you for your response. Your suggestion will be included in our assessment post-Consultation.

Question 2:	Do you agree with the proposed implementation technique? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
ScottishPower Energy Retail Limited (Energy Supplier)	No comments	Thank you for your response.

Question 3:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
ScottishPower Energy Retail Limited (Energy Supplier)	We have no comments at this time on the costs and benefits of this change.	Thank you for your response.

Question 4:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the Change Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
ScottishPower Energy Retail Limited (Energy Supplier)	We have no objections to this change being subject to self-governance.	Thank you for your response.

Question 5:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 27 June 2025? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
ScottishPower Energy Retail Limited (Energy Supplier)	We note that the Change Report provides the implementation date as 27 June 2025, whereas the consultation question proposes 27 June 2024. We assume this is an error and, in any case, we support the June 2025 implementation date.	Thank you for your response. The Code Manager would like to confirm the correct proposed implementation date is indeed 27 June 2025.

Question 6:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
ScottishPower Energy Retail Limited (Energy Supplier)	No comments.	Thank you for your response.