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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	**Final Recommendation**

CHANGE REPORT

R0232 – NON-DOMESTIC CHANGE OF OCCUPIER SDEP SCREENS (R0155 SOLUTION)

DOCUMENT VERSION	V2.0
PROPOSED IMPLEMENTATION DATE	07 NOVEMBER 2025
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	CHANGE PANEL	**CHANGE PATH**	SELF-GOVERNANCE
PRIORITY STATUS	MEDIUM	**URGENCY**	STANDARD
IMPACTED STAKEHOLDERS	ENERGY SUPPLIERS		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

This Change Proposal develops the dedicated Non-Domestic Change of Occupier Secure Data Exchange Platform (SDEP) screens that were not possible as part of R0155 – Change of Occupier: Evidentiary Standards and Timescales. The proposed solution provides new dedicated Non-Domestic Change of Occupier screens that would replace the temporary workaround provided in the R0155 solution.

RESPONSIBLE COMMITTEE DECISION

On 16 September 2025, the REC Change Panel, in line with the Code Manager's recommendation, voted to:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 07 November 2025.

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BACKGROUND

1 SUMMARY

R0155 – Change of Occupier: Evidentiary Standards and Timescales sets out the requirement to use SDEP in certain circumstances as part of the R0155 solution. SDEP is the REC's secure means of sharing data and for the R0155 solution will act as the secure mechanism for transferring the documents between the Gaining and Losing Energy Suppliers when there is a Change of Occupier with a Switch.

The Code Manager had hoped to introduce new, dedicated Non-Domestic Change of Occupier SDEP Process Type (PT) screens as part of R0155. However, due to the impacts of the MHHS Code Freeze, the SDEP Service Provider was unable to create these for the implementation of R0155 on 27 June 2025. In the interim, Energy Suppliers have been mandated to use existing PT screens (PT0056 and PT0067 Duplicate Meter Point screens) for sending the information and any escalations.

This Issue has been raised to develop the dedicated Non-Domestic Change of Occupier SDEP screens that were not possible as part of R0155. Should this Issue progress with a developed solution, the new dedicated Non-Domestic Change of Occupier screens will replace the temporary workaround provided in the interim solution.

Further information on the use of SDEP in the Non-Domestic Change of Occupier process, including further details on the temporary workaround SDEP where existing screens have additional uses added, and the Code Manager's expectation for the progression of the newly dedicated Non-Domestic Change of Occupier screens, can be found in section 8.5 of the R0155 Change Report (Final Recommendation).

2 PROBLEM STATEMENT

Due to the MHHS Code Freeze, newly dedicated Non-Domestic Change of Occupier SDEP screens could not be implemented as part of the R0155 solution and instead the additional use of existing screens was proposed as a temporary workaround. Energy Suppliers were clear in their responses to the R0155 impact assessment and consultation that using a temporary workaround (with the temporary solution being the additional use of existing screens PT0056 and PT0067) would create additional workload and risk and that newly dedicated SDEP screens for Non-Domestic Change of Occupiers would still be required.

3 IMPACTS

CONSUMERS
Non-Domestic Gas and Electricity
Microbusiness
Small and Medium Enterprise (SME)
Industrial and Commercial (I&C)

REC DOCUMENTS / PRODUCTS
Non-Domestic Change of Occupier Schedule
Non-Domestic Change of Occupier Guidance Document
Schedule 23 – Registration Services

REC PARTIES AND SERVICE USERS
Energy Suppliers

REC SERVICE PROVIDERS
Secure Data Exchange Service

REC CODE MANAGER
REC Performance Assurance

MHHS
There is no impact to MHHS from this Change Proposal.

4 CROSS-CODE IMPACTS

No cross-code impacts have been identified by the Code Manager.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**06 Feb-25**	**24 Jul-25**
	Solution Analysis	February	June
	Party Impact Assessment	March	April
	Solution Refinement	April	April
	Service Provider Impact Assessment	May	July
Change Proposal		**25 Jul-25**	**06 Oct-25**
	Business Case Assessment	July	July
	Consultation	August	August
	Final Determination	September	September
Voting		**07 Oct-25**	**07-Oct 25**
	Appeal Window	08 October	22 October

6 STAKEHOLDER ENGAGEMENT

The Code Manager has engaged with the Change Issues Group to determine the requirements for the newly dedicated Non-Domestic Change of Occupier SDEP screens. Market Participants, in particular Energy Suppliers, have been invited to provide their suggestions and requests for what should be included in the screens. Stakeholders were also provided with the opportunity to engage via a Party impact assessment and will be further engaged with an upcoming industry consultation.

7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	2	27	53
	Retail Markets Impact	Innovation and Market Arrangements	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	1	14	14
Resource	Complexity / Effort / Duration		1	9	9
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		2	17	17
	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	1	10	10
				Overall Priority Score (rounded)	133

Priority Status	MEDIUM
Change Proposal Type	STANDARD

This Issue has been provided with a priority status of medium based on a weighted prioritisation score of 133.

SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

The Code Manager has engaged with the Change Issues Group to complete the solution analysis for R0232. At the February Change Issues Group meeting, attendees were invited to discuss and determine the requirements for the dedicated Non-Domestic Change of Occupier SDEP screens. The Code Manager presented a draft list of requirements which could be included in the SDEP screens. Attendees agreed with the list presented, and this has now been taken forward as the proposed solution. Further details can be found in Section 9 of this Change Report.

The Party impact assessment acted as further solution analysis. It provided an additional opportunity for Parties to input into the design of the screen and confirm whether the list of current requirements was sufficient, or if additional items needed to be included. The Party impact assessment also allowed the Code Manager to provide more details, requirements, and expectations to the SDEP Service Provider as they conducted their impact assessment and subsequently developed the solution.

9 PROPOSED SOLUTION

The proposed solution introduces new dedicated Non-Domestic Change of Occupier SDEP screens, with a separate screen for gas and electricity. The solution will also incorporate reporting for Performance Assurance using the existing SDEP reporting framework, which will be further enhanced subject to the successful approval and implementation of R0122 – SDEP Review Improvements (2) – Usability through the change process.

The Non-Domestic Change of Occupier SDEP Screens will contain the following information:

- Meter Point X Number (MPxN)
- Multi MPxN flag – i.e. are there more than one
- Date of CoO
- Number of attachments
- Accept evidence - Y / N – only available to the receiving supplier
- Additional info – must be populated if N

The Non-Domestic Change of Occupier SDEP screens will also auto populate the following:

- Date of creation, date of response.
- The Service Level Agreement (SLA) is 10 Working Days so it will require the RAG status based on this obligation.

A further two SDEP escalations screens (one for gas and one for electricity) will be created for the Non-Domestic Change of Occupier process. These will be as per the standard REC escalations, and will include the MPxN, date of creation and number of attachments.
As part of any solution, the Code Manager will also update the non-mandatory Non-Domestic Change of Occupier Guidance Document to include further details on the newly dedicated SDEP screens, as well as further training material for Energy Suppliers, and will include a plan for queries raised at cut over and data retention obligations.

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PRELIMINARY ASSESSMENT

10 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

10.1 SERVICE PROVIDER IMPACT ASSESSMENTS

The SDEP Service Provider was issued with an Initial and Preliminary Service Provider impact assessment in June and July 2025. A summary of their response supporting the proposed solution can be found below.

No further Service Provider impact assessment was required.

SDEP SERVICE PROVIDER	• **Minimal Impact Confirmed:** The Service Provider confirmed no system or process changes would be required for the proposed solution, and there would be minimal costs and effort involved. The solution is primarily configuration-based, taking 1-2 days to design, test and build the new process types. • **Supportive of the Proposed Solution:** No additional requirements for the proposed SDEP screens were identified. The Service Provider did, however, highlight that the costs would be dependent on whether implementation occurs pre, or post, MHHS go-live. • **No Impacts or System Changes:** No technical or operational impacts were identified. • **Low-Cost Delivery**: No ROM costs were associated with design, build, or test phases. Delivery costs include £901(post-MHHS go-live), or £1802 (pre-MHHS go-live) for process type creation, and £1179 for associated documentation. No ongoing operational costs were identified. • **Standard Implementation Approach:** The lead time required to design, test and build the new process types is estimated to be 1-2 days. No dependencies or phased delivery requirements were noted and combining the delivery with other SDEP Change Proposals was not seen to offer cost or time savings. • **RAID:** The Service Provider noted one assumption, being that the user assignment to new process types will be handled by each organisation's Master Admin User.

10.2 REC PARTY IMPACT ASSESSMENTS

On 14 March 2025, the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for R0232. The Code Manager received four responses from Energy Suppliers. These responses have been summarised below.

ENERGY SUPPLIERS	• All respondents expressed support for the proposed SDEP screen solution for the Non-Domestic Change of Occupier process, while also offering further suggestions for enhancements and clarifications. • Respondents highlighted the importance of mandating the use of SDEP by Gas Suppliers for the Non-Domestic Change of Occupier process, as implemented under R0155, to ensure the effectiveness of the solution. Additional recommendations included incorporating fields such as Consumer contact details to support Energy Supplier's verification processes. • The proposed solution was seen as a means to streamline the Change of Occupier process, particularly in the sharing of evidentiary documentation between Energy Suppliers, and to strengthen Performance Assurance capabilities. • Consideration of costs were primarily associated with implementation efforts and potential internal system modification changes required to support the new functionality. • Respondents expressed a preference for a simple, user-friendly screen design supported by comprehensive guidance. Clarification was also requested regarding the reset of SLA timelines under R0155 when documentation is resubmitted.

The full consolidated responses with further Code Manager comments can be found on the REC Portal, here.

11 BUSINESS CASE ASSESSMENT

11.1 COSTS

COSTS	DESIGN/ DEVELOPMENT COSTS	IMPLEMENTATION COSTS	ONGOING OPERATIONAL COSTS
SERVICE PROVIDER	£2,080	£0	£0 PER ANNUM

REC BUDGET APPROVAL SECURED FOR CENTRAL SYSTEM COSTS	03 September 2025

The SDEP Service Provider provided cost estimates for both pre- and post-MHHS go-live implementation scenarios. As the Code Manager has proposed an implementation date following MHHS go-live, only the post-MHHS costs have been included in the Business Case Assessment and recommendation.

11.2 BENEFITS

TANGIBLE BENEFITS	BENEFITS DESCRIPTION
FASTER RESOLUTION OF QUERIES	With dedicated process types and escalation paths, queries and disputes regarding Non-Domestic Change of Occupier evidentiary documents can be resolved more quickly, improving the overall efficiency of the process and reducing delays for Consumers.
REDUCED WORKLOAD	Implementing dedicated SDEP screens for the Non-Domestic Change of Occupier process removes the need for temporary workarounds using PT0056 and PT0067. This reduces manual effort, minimises process complexity, and mitigates the risk of errors, addressing Energy Supplier acknowledgement during the R0155 impact assessment and consultation that dedicated process types will reduce workload.

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
ENHANCED DATA SECURITY	R0232 will provide enhanced data security in the following areas: • The introduction of newly dedicated process types will ensure that only authorised Change of Occupier teams within Energy Suppliers have access to Change of Occupier related data and documents. This addresses a key risk raised during the R0155 Change Process, where the temporary use of existing screens (PT0056 and PT0067) allowed broader access to sensitive Change of Occupier information by teams not permitted to access it. • Purpose-built screens reduce the likelihood of documents being lost, misrouted, or incorrectly processed. This enhances the reliability of the Change of Occupier process and reduces the risk of non-compliance. Continued use of SDEP ensures that sensitive Consumer data and evidentiary document are exchanged securely, maintaining compliance with data protection standards and reducing the risk of data breaches. This is further strengthened with dedicated process type screens for the Non-Domestic Change of Occupier process.
ENHANCED PERFORMANCE ASSURANCE	The introduction of dedicated Non-Domestic Change of Occupier SDEP screens significantly enhances the Code Manager's Performance Assurance capabilities. By incorporating structured data capture and automated field population, such as "date of creation" and "date of response", the proposed solution enables precise tracking of SLA compliance, which is set at 10 Working Days in accordance with R0155. The inclusion of RAG status indicators

	provides a clear, visual representation of SLA adherence, allowing both Energy Suppliers to proactively monitor and address performance issues.
IMPROVED CONSISTENCY	The new process types for the Non-Domestic Change of Occupier process will have standardised screen layouts and data fields, ensuring that all Energy Suppliers follow the same process. This will improve consistency across the market and reduces variation in how Consumer data may be submitted and interpreted.
INCREASED USER CONFIDENCE	A clear and purpose-built process types for the Non-Domestic Change of Occupier process improves usability, reduces training needs, and will build confidence among users in the reliability of SDEP for the purpose of sharing evidentiary documents.

11.3 COST BENEFIT ANALYSIS

The Code Manager believes the cost and effort of the implementation of this Change Proposal is proportionate to the benefits being brought by the proposed solution.

The proposed solution delivers a strong cost-benefit case, with minimal development costs and no ongoing operational costs. Tangible benefits directly improve operational efficiency and reduce the burden on Energy Suppliers, while intangible benefits enhance data security, compliance, and market confidence. The balance of cost versus benefit supports the Code Manager's minded-to-position that the Responsible Committee should approve the proposed solution for implementation, with positive impacts for Energy Suppliers, the Code Manager, and Consumers.

12 CASE FOR CHANGE

The Code Manager considers the case for change to be justified on the basis that:

- The proposed solution directly resolves the problem statement;
- The cost-benefit analysis demonstrates a strong business case, with minimal development and implementation costs (£2,080) and no ongoing operational costs, the proposed solution delivers operational, compliance and performance benefits for Energy Suppliers, the Code Manager, and Consumers;
- The effort required to develop and implement this solution is 1-2 days from the SDEP Service provider, and is proportionate to the benefits realised from the proposed solution;
- If implemented, the proposed solution will increase effectiveness of the Non-Domestic Change of Occupier process, reduce risk and improve consistency. If the proposed solution is not implemented, Energy Suppliers will have to continue to rely on a temporary solution that increased operational burden and risk of non-compliance;

- The proposed solution provides positive Consumer and market outcomes, with Consumers benefiting from faster query resolution, improved service reliability, and greater confidence that their data is being shared securely. The retail energy market will benefit from a standardised process, enhanced Performance Assurance, and secure data handling; and
- The change is supported by Market Participants and has a strong business case as detailed in sections 11 and 12 of this Change Report.

13 ASSUMPTIONS AND DEPENDENCIES

	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
I0232.A001	Implementation post MHHS M8	This Issue has been raised with the assumption that it may not be implemented until after MHHS M8. This is due to the requirement of a SDEP Service Provider impact assessment. However, the SDEP Service Provider has reduced capacity to impact assess proposals until after the conclusion of the MHHS Code Freeze.	Closed – the Service Provider has confirmed the screens development can be post MHHS M8, and the Code Manager's proposed implementation date is 07 November 2025.

NO.	DEPENDENCY	NOTES	STATUS
I0232.D001	Authority Approval of R0155.	The progression of the Issue is dependent upon Change Proposal R0155, and the proposal to implement the new Non-Domestic Change of Occupier Schedule and mandate the use of SDEP for the process, receiving Authority Approval.	Closed - the Authority provided approval for R0155 on 04 February 2025. This dependency has now been resolved and ensures R0232 will be progressed.
I0232.D002	Service Provider impact assessment following the conclusion of MHHS Code Freeze.	This Issue has been raised with the assumption that it may not be implemented until after MHHS M8. This is due to the requirement of a SDEP Service Provider Impact Assessment. However, the SDEP Service Provider has reduced capacity to impact assess proposals until after the conclusion of the MHHS Code Freeze.	Closed – Service Provider Impact Assessment returned in July 2025.

15 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 08 August 2025 to obtain views on the Change Report (For Consultation). In total two responses were received from Energy Suppliers. The key themes from these responses have been summarised and set out below. The non-confidential responses have been published here.

15.1 SUMMARY OF RESPONSES

Overall, consultation respondents were supportive of the proposed change and welcomed the dedicated SDEP screens for the Non-Domestic CoO process. Respondents agreed with the implementation date and the Code Manager's case for change, but a comment was provided around ensuring there is consistent interpretation of terminology from all SDEP users.

15.2 COMMENTS ON THE PROPOSED SOLUTION

The proposed solution was broadly supported. However, concerns were raised regarding the clarity of the term "Date of CoO." The Code Manager has acknowledged this and committed to updating the relevant R0155 - Non-Domestic Change of Occupier guidance documents to ensure consistent interpretation across all SDEP users.

15.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

There was agreement with the case for change and the Code Manager's recommendation. The proposed solution was seen as necessary to support effective document sharing within SDEP for Non-Domestic CoOs.

15.4 IMPLEMENTATION DATE AND APPROACH

All respondents agreed with the proposed implementation date of 07 November 2025. No concerns were raised regarding the implementation timeline or approach.

16 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No amendments have been made to any Change documentation, or the proposed solution, following the consultation. Subject to approval of this Change Proposal, the R0155 Guidance Document will be amended to reflect the introduction of the new process types and requirements.

17 APPENDIX

CHANGE PROPOSAL	Link
SDEP TRAINING DECK V2.0	Link
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
CONSOLIDATED CONSULTATION RESPONSES	Link
RELATED CHANGES	R0155 – Change of Occupier: Evidentiary Standards & Timescales R0122 – SDEP Review Improvements (2) - Usability
ANY OTHER DOCUMENTS / LINKS	Non-Domestic Change of Occupier Schedule Non-Domestic Change of Occupier Guidance Document R0155 Change Report (Final Recommendation) Market Half Hourly Settlement (MHHS) Code Freeze Impact

18 GLOSSARY

TERM	DEFINITION
Change of Occupier (CoO)	means that the Consumer at a premises has changed (or is due to change).
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier
Master Admin User (MAU)	means, in respect of a REC Service User, the Authorised Person who has the relevant access rights to manage the accounts of the REC Service User's other Authorised Persons.
Meter Point X Number (MPxN)	means the collective description of the MPAN and MPRN when used together.
Performance Assurance	means the activities undertaken by the Code Manager and the REC PAB in accordance with the Performance Assurance Schedule.

TERM	DEFINITION
Secure Data Exchange Portal (SDEP)	means the portal of that name which forms part of the Secure Data Exchange Service.
Secure Data Exchange Service (SDES)	means the service described in the SDES Service Definition.