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

CHANGE REPORT

R0248 REC CHANGES TO TIE IN WITH DCP451 - SUSPENDING REGISTRATIONS

DOCUMENT VERSION	V1.0
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	DNOS, Energy Suppliers		

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

Distribution Connection and Use of System Agreement (DCUSA) Change DCP451 Suspending Registrations and this cross-code REC Change have been raised to provide clarity on the process for when a Distribution Network Operator (DNO) ends a Regulatory Alliance with an Energy Supplier. The solution must consider a cross-code solution, which does not put Consumer outcomes at risk.

RESPONSIBLE COMMITTEE DECISION

On 05 August 2025, the REC Change Panel voted, in line with the Code Manager recommendation, 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

A change was raised by a DNO to DCUSA, to provide clarity on the process for when a DNO ends a Regulatory Alliance with an Energy Supplier. This DCUSA change is DCP451 Suspending Registrations.

A REC Change was subsequently raised following discussions at the Cross Code Steering Group (CCSG) as many of the processes for breaking a Regulatory Alliance are held in REC Schedule 24 Switching Data Management.

2 PROBLEM STATEMENT

A lack of clarity on the process for when a DNO ends a Regulatory Alliance with an Energy Supplier can cause confusion with the Energy industry, and lead to poor Consumer outcomes if the correct process is not followed.

3 IMPACTS

CONSUMERS
Indirect

RECCO / REC CODE MANAGER
REC Performance Assurance Board (PAB)

RECCO / REC CODE MANAGER
Schedule 24 Switching Data Management

REC PARTIES AND SERVICE USERS
DNOs
Energy Suppliers
Central Switching Service (CSS)

MHHS
Amendments are being made to Schedule 24 Switching Data Management by the MHHS programme. While drafting the legal text for this Change Proposal, the Code Manager cross-referenced with the MHHS baseline of Schedule 24 Switching Data Management to ensure there were no discrepancies in the drafting.

4 CROSS-CODE IMPACTS

This is a cross-code change to DCUSA Change DCP451 Suspending Registrations. DCUSA are the lead code for these changes.

DCP451 was discussed at DCUSA Panel 227 on 21 May 2025, where it was agreed it would be voted on ex-committee for a June implementation. While I0248 is linked to DCP451, there is no requirement for the changes to go live simultaneously.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**06 Mar 25**	**19 Jun 25**
	Code Manager Initial Assessment	March	March
	Solution Development	April	May
	Legal Review	May	June
	Business Case Assessment	June	June
Change Proposal		**20 Jun 25**	**18 Aug 25**
	Consultation	June	July
	Solution Refinement	July	August
	Final Determination	August	August
Voting		**19 Aug 25**	**19 Aug 25**
	Appeal Window	20 Aug 25	04 Sep 25

This change has been previously consulted on under DCUSA and the legal text changes are to provide clarity to process, but to make no changes to obligations. On this basis, the Code Manager proposed this Change Proposal does not have a Party impact assessment and proceeds straight to consultation. This was approved by the Change Panel on 17 June 2025.

6 STAKEHOLDER ENGAGEMENT

There have been two Working Group meetings held by DCUSA for these changes, on 05 March 2025 and 02 May 2025. The REC Code Manager was present at both meetings.

This change was consulted on by DCUSA from 17 March to 07 April 2025, available here. Only the DCUSA legal text was consulted on, and the REC legal text created after the DCUSA legal text was finalised.

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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	1	27	27
	Retail Markets Impact	Innovation and Market Arrangements	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		2	9	18
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Cross Code Activity	2	10	20
				Overall Priority Score (rounded)	140

Priority Status	MEDIUM
Change Proposal Type	STANDARD

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SOLUTION

8 PROPOSED SOLUTION

This Change Proposal makes changes to Schedule 24 Switching Data Management. These changes are:

- An addition to section 4.5 (k), clarifying each DNO can end its Regulatory Alliance with the Energy Supplier, the scenarios in which DNOs can do this are covered by DCUSA and that the alliance must be re-established once the breach is remedied;
- A clarification that the Market Participant Role Alliance required to be sent to the CSS is a Market Message (specifically MM90003);
- Clarity that sections 4.10.5 and 4.10.6 are applicable when creating a Regulatory Alliance when an Electricity Supplier accedes to the DCUSA;
- New section 4.10.7A that specifies the DNO must notify the REC PAB when ending a Regulatory Alliance (this was previously held in the DCUSA, and has been removed from the DCUSA and added to the REC following legal advice to both Codes);
- Addition of 1 Working Day SLA to sections 4.10.8 and 4.11.8, requiring CSS to update Regulatory Alliance data or Registration Permission data within this time frame;
- New sections 4.10.9 to 4.10.11, creating a distinction on how Regulatory Alliances are re-established versus creating a Regulatory Alliance when an Electricity Supplier accedes to the DCUSA; and
- In section 4.11.6, where a Market Sanction is applied or removed from an Electricity Supplier under the Balancing and Settlement Code (BSC) or DCUSA, BSCCo or DCUSA to copy REC PAB into communications with the REC Code Manager. Again, this was previously held in the DCUSA, and has been removed from the DCUSA and added to the REC following legal advice to both Codes.

The Code Manager has confirmed with the CSS Provider that the addition of this 1 Working Day SLA has no to minimal impact to them, as they use event driven architecture and should process the Market Messages faster than this.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0248 can be found here.

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PRELIMINARY ASSESSMENT

10 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

No Service Provider or Party impact assessment was required as part of this Change Proposal, as it is clarifying an existing process rather than amending it and a consultation had already been conducted under the DCUSA.

This DCUSA consultation ran from 17 March to 07 April 2025, and is available here. Only the DCUSA legal text was consulted on, and the REC legal text created after the DCUSA legal text was finalised to ensure all impacts to the REC were captured.

11 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

11.1 RISKS AND ISSUES

There are no risks or issues associated with this Change Proposal.

11.2 ASSUMPTIONS AND DEPENDENCIES

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
R0248.A01	The DCUSA Change Panel approve DCP451 for implementation in June 2025.		Closed – on 18 June 2025, DCUSA Panel voted to approve DCP451 for implementation on 26 June 2025.
R0248.A02	The REC and DCUSA changes do not need to go live at the same time.		Closed – validated in discussions with the DCUSA. It has been determined as the changes are not amending obligations, only adding clarity, there is no requirement for them to go live together. If DCP451 is implemented in June 2025 and R0248 in November 2025, there will be a five month window where the obligation for DNOs to inform the REC PAB when they are ending a Regulatory Alliance will not sit in either Code. It has been decided this is a minor risk and should not delay DCP451 go live to November 2025.

12 BUSINESS CASE ASSESSMENT

12.1 COSTS

There are no costs identified with this Change Proposal.

12.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
IMPROVED CLARITY ON THE PROCESS FOR WHEN A DNO ENDS A REGULATORY ALLIANCE WITH AN ENERGY SUPPLIER	The DCUSA allows DNOs to end Regulatory Alliances with an Energy Supplier under certain conditions. The process for ending a Regulatory Alliance has changed, compared with the process that was in place prior to CSS going live. This process needs to be as clear as possible so all Parties are aware of their responsibilities and can discharge their actions in a timely manner.
KEEP THE DCUSA AND THE REC ALIGNED	The DCUSA and REC legal text have been reviewed in tandem, and some obligations which used to sit in the DCUSA have been moved to the REC (e.g. DNOs notifying the REC PAB when ending a Regulatory Alliance). Implementing only one of these changes would cause misalignment between the Codes and potentially lead to some obligations being lost. This benefit only applies if the DCUSA Change Panel approve DCP451 for implementation in June 2025, which has been captured as an assumption in section 11 of this Change Report.

12.3 COST BENEFIT ANALYSIS

As there are no costs identified with this Change Proposal and two intangible benefits, the Code Manager believes there is a positive case for change.

13 CASE FOR CHANGE

The Code Manager considers there is a positive case for change for implementing this Change Proposal on the basis that the proposed solution:

- Appropriately resolves the problem statement;
- Has no central system costs, no to minimal costs to Parties and has proportionate effort required for implementation;
- Introduces clarity into the REC for the process of DNOs ending Regulatory Alliances; and
- On the assumption the DCUSA Change Panel approve DCP451 for implementation in June 2025, keep the DCUSA and REC codes in alignment.

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14 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 20 June 2025 to obtain views on the Change Report (For Consultation). In total five responses were received from four DNOs and one Energy Supplier. The key themes from these responses have been summarised and set out below. The responses have been published here.

14.1 SUMMARY OF RESPONSES

All five respondents were supportive of this Change Proposal and believed it should be implemented.

14.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

All five respondents were supportive of the proposed solution, and did not identify any consequential changes from DCUSA Change DCP451 that had not been captured in the REC legal text.

One respondent commented they believed there should the introduction of monitoring on the one Working Day SLA for CSS to make the update to Regulatory Alliances, and that the CSS should send confirmation to the Party when the update has been made.

The Code Manager has reviewed these suggestions and confirmed they are out of scope of R0248 as this Change Proposal is only clarifying existing obligations, not adding any new ones. These are new processes which would need to be impact assessed and potentially have costs associated. The Code Manager has reached out the respondent to encourage them to raise a new change with these suggestions.

14.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

All respondents agreed with the assessment of costs and benefits made by the Code Manager for this Change Proposal.

All respondents agreed with the Code Manager's recommendation that this Change Proposal is recommended for approval via the Self-Governance Change Path with the REC Change Panel as the Responsible Committee.

14.4 IMPLEMENTATION DATE AND APPROACH

All respondents agreed with the proposed implementation approach of Big Bang and proposed implementation date of 07 November 2025.

15 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No amendments were made following consultation.

16 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED CONSULTATION RESPONSES	Link
RELATED CHANGE(S)	DCUSA Change DCP451
ANY OTHER DOCUMENTS / LINKS	DCUSA consultation responses

17 GLOSSARY

TERM	DEFINITION
Balancing and Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
Balancing and Settlement Code Company (BSCCo)	means the company defined as such in the Balancing and Settlement Code.
Central Switching Service (CSS)	means the Systems and processes provided or procured by the CSS Provider for the purpose of providing the Address Management Service and the Registration Service.
CSS Provider	means the DCC when performing functions under or in relation to this Code (but always excluding its functions under the Smart Energy Code and its roles as CSS Systems Integrator, SI Provider and Switching Operator), including in respect of the Central Switching Service and including in effecting the design, build and testing of any System that will allow it to perform functions under this Code after the CSS Go-Live Date. This role is the CSS Procurer and Manager function as described in the E2E Data Migration Plan, E2E Integration Plan, E2E Post Implementation Plan, E2E Testing Plan, E2E Transition Plan: Implementation Approach and E2E Transition Plan: In-Flight Switches Approach.
Distribution Connection and Use of System Agreement (DCUSA)	means the agreement of that name maintained pursuant to the Electricity Distribution Licences.
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Electricity Supplier	means a person holding an Electricity Supply Licence.

Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
REC Performance Assurance Board (REC PAB)	means the performance assurance board for this Code, as from time to time established under Clause 15 of the main body of this Code (which is a Sub-Committee).
Regulatory Alliance	means that the necessary regulatory relationships exists between Market Participants, as defined in the Switching Data Management Schedule.