RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0248 REC CHANGES TO TIE IN WITH DCP451 - SUSPENDING REGISTRATIONS

On 20 June 2025 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0248 REC Changes to tie in with DCP451 - Suspending Registrations.

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	23 July 2025
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Caroline Freimuller

DATE CONSULTATION ISSUED	20 June 2025
RESPONSE DEADLINE	11 July 2025

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish and Southern Energy Networks (Distribution Network Operator)	SSEN agrees with the proposed solution. The proposed solution brings clarity to the process for all parties.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes, SPEN are supportive of this proposal.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We are supportive of this change to tie in with DCP451. We believe that this change provides clear and consistent guidance on the process for ending a regulatory alliance with a supplier. In turn this should reduce confusion by aligning the DCUSA and REC codes.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE agrees with the proposed solution.	Thank you for your comments.

Question 2:	Do you have any comments on the proposed legal text? Specifically, are there any consequential changes from DCUSA Change DCP451 you believe have not been captured?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish and Southern Energy Networks (Distribution Network Operator)	SSEN believes the proposed legal text captures the consequential changes in DCP451	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	We have not identified any consequential changes that have not been captured.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	From what we have been able to ascertain there are no consequential changes that appear to have been missed. The report states that the REC legal text was created after the DCUSA legal text was finalised and from what we can see nothing has been omitted.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.

Question 3:	Do you agree with the proposed implementation approach (Big Bang)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish and Southern Energy Networks (Distribution Network Operator)	SSEN agrees this change should have big bang approach as there are no or little system changes or costs to industry parties	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we support the implementation approach.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE agrees with the implementation approach.	Thank you for your comments.

Question 4:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish and Southern Energy Networks (Distribution Network Operator)	Yes	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	There should be no additional costs for this change, we are in agreement with this cost assessment. In terms of the benefits, we agree that the key benefits of this change will be an improved clarity for DNOs ending Regulatory Alliances, and it will keep the DCUSA and REC Codes properly aligned.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes.	Thank you for your comments.

Question 5:	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 REC Change Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish and Southern Energy Networks (Distribution Network Operator)	SSEN agrees with the Code Manager's assessment	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree that the change path should be one of self-governance. There will be no material impact on customers, there is no real cost for the change and there are no contentious elements.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes.	Thank you for your comments.

Question 6:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 07 November 2025 If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish and Southern Energy Networks (Distribution Network Operator)	Yes, the implementation date causes no concerns for SSEN	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we are supportive of this change being implemented as soon as possible.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We are inclined to agree with the Code Manager with the implementation date. This will allow sufficient time following the approval of DCP451 for the REC legal text changes to be finalised. Whilst the two changes are linked, they do not need to go live simultaneously. This phased approach will allow a smooth change across codes.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE has no issue with the implementation date and so agrees with implementation in November 2027.	Thank you for your comments. The Code Manager has checked with SSE, who have confirmed this is a typographical error and they are supportive of the proposed implementation date in November 2025.

Question 7:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish and Southern Energy Networks (Distribution Network Operator)	SSEN would like a process to ensure the 1-day SLA for CSS to break alliances is monitored and a confirmation communication is sent to the party breaking the alliance. SSEN approves of the move from DCUSA to REC PAB notification when ending a Regulatory Alliance. This streamlines the process.	Thank you for your comments. The Code Manager has reviewed these suggestions and 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. However, the Code Manager would be happy for SSEN or any other Party to raise a new change proposing these where they can be appropriately investigated/impact assessed.
Northern Powergrid (Distribution Network Operator)	No	n/a
Scottish Power Energy Networks (Distribution Network Operator)	No other comments.	n/a
National Grid Electricity Distribution (Distribution Network Operator)	We are aware of our new obligation to report to REC PAB (instead of DCUSA), and will operate as such whilst the change is agreed/implemented.	Thank you for your comments.

SSE Energy Supply (Energy Supplier)	No.	n/a