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

CHANGE REPORT

R0254 – NON-DOMESTIC CHANGE OF OCCUPIER REPORTING (R0155 SOLUTION)

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	07/11/2025
IMPLEMENTATION APPROACH	BIG BANG

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

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

This Change Proposal introduces the reporting required as part of the ongoing Performance Assurance monitoring of the Non-Domestic Change of Occupier process and the R0155 – Change of Occupier Evidentiary Standards and Timescales solution.

CODE MANAGER'S MINDED-TO-POSITION

The Code Manager's minded-to-position is that that the REC Performance Assurance Board:

- **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

As part of the R0155 change process, the REC Performance Assurance Board (PAB) requested ongoing monitoring and reporting to identify outliers or abnormal behaviour which the Code Manager would then follow up in more detail. However, this planned reporting by Energy Suppliers was descoped from R0155 due to the ongoing development of an Ofgem Reporting Request for Information (RFI) (titled Non-Domestic Market Monitoring Request for Information).

The Ofgem RFI includes data received from Energy Suppliers relating to the time taken for a Non-Domestic Consumer's Change of Occupier (CoO) request to be completed and to simplify the process for Energy Suppliers, REC Performance Assurance (RPA) intend on using the same data. This reduces the burden on Energy Suppliers to provide two related, but different reports in the same topic areas. The Code Manager intended to use the reporting from the Ofgem RFI for ongoing Performance Assurance monitoring of the Non-Domestic CoO process. However, this was not confirmed by Ofgem in time for the R0155 implementation, as such this separate REC Change Proposal is required to include this data as part of the ongoing Performance Assurance monitoring.

The Ofgem reporting RFI was finalised and issued to Energy Suppliers on 11 March 2025. Energy Suppliers responded on 28 May for Q1 (01 January – 31 March 2025), and 14 August for Q2 (01 April – 30 June 2025), and will respond on 14 November for Q3 (01 July – 30 September), however the RFI may still be subject to Change. The Q3 reporting would be the first full set of reporting that would include data following the implementation of R0155 on 27 June 2025.

2 PROBLEM STATEMENT

PAB confirmed that during the R0155 change process that they wanted to monitor the R0155 solution going forward. The planned reporting by Energy Suppliers was descoped from R0155 due to the ongoing development of an Ofgem Reporting Request for Information (titled Non-Domestic Market Monitoring Request for Information). Without the Ofgem RFI data being submitted, or an alternative means of receiving or reporting Non-Domestic Change of Occupier data, REC Performance Assurance are unable to complete the ongoing monitoring activity originally requested by the PAB.

3 IMPACTS

CONSUMERS
Non-Domestic Consumers

RECCO / REC CODE MANAGER
REC Performance Assurance

REC PARTIES AND SERVICE USERS
Energy Suppliers

REC DOCUMENTS / PRODUCTS
Performance Assurance Reporting Catalogue (PARC)

MHHS DESIGN
No impacts.

MHHS DATA SPECIFICATION
No impacts.

MHHS CODE DRAFTING
No impacts.

4 CROSS-CODE IMPACTS

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

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**04 May-25**	**30 Jul-25**
	Solution Development	Completed	Completed
	Party Impact Assessment	June	June
	Service Provider Impact Assessment	June	July
	Solution Refinement	July	July
Change Proposal		**31 Jul-25**	**29 Sept-25**
	Business Case Assessment	July	August
	Consultation	August	August
	Final Determination	September	September
Voting		**30 Sept-25**	**30 Sept-25**
	Appeal Window	01 October	15 October

The Code Manager has set a Proposal Plan in preparation for a proposed implementation as part of the standard November 2025 REC Release.

During the change process for R0155, the Code Manager made a commitment to implement the Non-Domestic Change of Occupier Reporting Change Proposal as soon as possible after

the implementation of R0155. This Proposal Plan has been proposed to ensure this commitment can be met.

6 STAKEHOLDER ENGAGEMENT

Stakeholder engagement on the reporting requirements for the Non-Domestic Change of Occupier process took place during the R0155 change process. Further details of this can be found in section 8 of this Change Report and the R0155 Change Report (Final Recommendation).

The Proposal Plan for R0254 has ensured further stakeholder engagement via a Party impact assessment and an industry consultation will take place. Where required, the Code Manager has also engaged with the REC Change Issues Group (CHIG).

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	0	17	0
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	7	7
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		3	9	28
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	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	2	10	20
				Overall Priority Score (rounded)	118

Priority Status	MEDIUM
Change Proposal Type	STANDARD

This Issue has been given a priority status of medium based upon a weighted prioritisation score of 118.

SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

Solution analysis for this change took place during the solution development and wider change process for R0155 – Change of Occupier: Evidentiary Standards and Timescales. During this stage, the Code Manager initially consulted with the PAB on 30 July 2024 setting out options for assuring the amendments to the CoO process. There was significant focus from the PAB on preventing any performance or compliance issues, and having data led monitoring of performance across the market. In particular, the PAB requested ongoing monitoring to identify outliers or anomalous behaviour, which the Code Manager would then follow up in detail in line with existing Performance Assurance Methodology and Techniques.

Following further analysis during the stakeholder engagement activities of the R0155 change process, including further consultation with the PAB, the Code Manager determined that the most appropriate method of assessing compliance was through direct sampling of Energy Supplier compliance based upon pre-existing market data. This included data received from Energy Suppliers on the time taken for a Non-Domestic Consumer's request to agree to a CoO. The information would be requested by Ofgem as part of their Non-Domestic Market Monitoring RFI, and to simplify the process for Energy Suppliers, the Code Manager made a commitment to request the same data, thus reducing the need to make two related but different reports in the same topic area. This approach gathered industry support during the consultation for R0155.

The Code Manager explored the most suitable approach to achieve this. However, the Ofgem RFI would not be confirmed prior to the Final Recommendation for R0155. Consequently, the updates to the PARC, to include direct reference to the Ofgem RFI, could not be implemented until after the R0155 implementation date. As such, the Code Manager agreed to raise a subsequent, separate Change Proposal, to update the PARC following the confirmation, issuing and first submission of the Ofgem RFI.

9 PROPOSED SOLUTION

To support ongoing Performance Assurance monitoring activities, including backdated reporting between the implementation of R0155 and the proposed implementation of R0254, Non-Domestic CoO data from the Ofgem Non-Domestic Market Monitoring RFI can be provided to REC Performance Assurance through one of the following two delivery approaches:

1. **Inclusion in the PARC and REC Portal Submission:**
   This would require Energy Suppliers to submit the relevant data (this being the data included in the Ofgem RFI Change of Tenancy tab) via the REC Portal.
2. **Formal Agreement between Ofgem and the REC Code Manager:**
   Under this arrangement, Ofgem would share the Non-Domestic CoO data directly with the Code Manager, reducing the administrative burden on Energy Suppliers by eliminating the need for duplicate submissions.

To enable quick and efficient implementation aligned with the commitments made under R0155, the initial proposed delivery approach will require Energy Suppliers to only upload the Change of Tenancy tab from the Ofgem RFI to the REC Portal. No other tabs from the RFI will be required. If a formal agreement is later established allowing Ofgem to share the data directly with the Code Manager, the reporting and assurance processes will remain unchanged, however, Energy Suppliers will no longer need to submit the data themselves via the REC Portal. This process, and how it would transition, is further detailed below.

9.1 DATA SUBMISSION AND TRANSITION GUIDANCE

At the point of implementation of R0254, the proposed solution will incorporate the Non-Domestic CoO data from Ofgem's Non-Domestic Market Monitoring RFI into the PARC. This will require Energy Suppliers to submit the relevant data via the REC Portal, ensuring that the Code Manager can monitor performance effectively and in line with the objectives of R0155.

To ensure flexibility and futureproofing, the PARC will include a reference link to the Ofgem RFI rather than duplicating the data definitions within the REC documentation. This approach ensures that if Ofgem updates the structure, frequency, or content of the RFI, the PARC remains valid and aligned without requiring a further Change Proposal. Any updates to the RFI will be automatically reflected in the data submissions required by the Code Manager, maintaining consistency and reducing administrative burdens.

In parallel, the Code Manager will scope the development of a formal agreement with Ofgem. If such an agreement is successfully established, Ofgem would share the relevant CoO data directly with the Code Manager. This would remove the need for Energy Suppliers to submit the same data via the REC Portal.

Should this agreement be confirmed, the Code Manager will communicate the transition to all Energy Suppliers, clearly setting out the change in data submission responsibilities. Importantly, this transition will not require a new Change Proposal, as the original solution is designed to accommodate this pathway and would contain the same data for reporting purposes. The monitoring process will continue seamlessly, ensuring ongoing compliance with the Performance Assurance framework and uninterrupted oversight of the CoO process.

9.2 BACKDATED REPORTING

Post-implementation of R0254, Energy Suppliers will be required to provide backdated reporting to the Code Manager covering the period from 01 July to 07 November 2025. This will be split between the Q3 and Q4 submissions to Ofgem through the Non-Domestic Market Monitoring RFI with Q3 due on 14 November 2025.

Initially, this data will need to be submitted via the REC Portal in line with the inclusion of the reporting requirement in the PARC. Should a formal agreement between Ofgem and the Code Manager be in place at the point of implementation, Energy Suppliers will not be required to submit the backdated data via the REC Portal. Instead, the Code Manager will receive the relevant data directly from Ofgem.

REC Performance Assurance will issue further guidance to Energy Suppliers outlining the submission requirements, and any transition arrangements, following approval of this Change Proposal.

10 DRAFT LEGAL TEXT

An extract of Ofgem Non-Domestic Market Monitoring RFI template containing the requirements for the Change of Occupier (referred to in the template as Change of Tenancy) can be found here.

No legal text changes to existing REC Schedules, including Schedule 33 - Non-Domestic Change of Occupier that was implemented on 27 June 2025, are included as part of this Change Proposal. Instead, the required data for ongoing monitoring will be incorporated into the PARC. To ensure alignment with the Ofgem Non-Domestic Market Monitoring RFI, the PARC will not specify individual data items. Instead, it will reference the information required under the Ofgem RFI, with a direct link to the latest Ofgem RFI template.

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PRELIMINARY ASSESSMENT

11 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

11.1 SERVICE PROVIDER IMPACT ASSESSMENTS

A Service Provider impact assessment was issued to REC Performance Assurance to assess the impacts of the new data, PARC and assurance requirements for R0254. A summary of responses can be found below.

REC PERFORMANCE ASSURANCE (RPA)	• RPA supports the proposed changes under R0254 and has based their response on their initial Service Provider impact assessment for R0155 whilst reviewing the effort involved and seniority of resources required. The response is contingent on data-sharing agreements with Ofgem and assumes timely availability of reporting data. • RPA noted a preference of delivery option 2 (a formal agreement with Ofgem), which reduces administrative burden while maintaining effective oversight. They emphasised the need for Ofgem's approval to share RFI data with the Code Manager to enable Performance Assurance. • The Change Proposal will require updates to several assurance documents and products including the PARC, Retail Risk Register, and dashboards. RPA also anticipates design and testing activities to ensure accurate risk monitoring and reporting. • Estimated costs include £6,680 for reporting design, £10,350 for build activities, and £5,100 for testing. 13 FTE days are also anticipated for design, test and build activities. • RPA acknowledged that this Change Proposal will provide multiple benefits that are proportionate to the costs, including streamlined reporting, reduced duplication of effort for Parties, and improved risk oversight for the Code Manager. • RPA anticipates a one-month lead time from agreement of data sources to delivery of reports and dashboards. They noted that dashboard publication must align with the PAB timetable and assume no additional mobilisation time is needed. • Key dependencies include timely data provision from Ofgem and Suppliers, and availability of test data to support build and assurance activities. Risks include potential delays or gaps in reporting that could impact the effectiveness of risk monitoring.

11.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment targeting Energy Suppliers was conducted from 06 June 2025 to 27 June 2025. In total five responses were received from Energy Suppliers. The non-confidential responses have been published here. A summary of all responses can be found below.

ENERGY SUPPLIERS	• Respondents generally support the need for improved reporting for the Non-Domestic CoO process, with a strong preference for a solution that avoids duplication of effort. Consequently, respondents were supportive for the Ofgem RFI data to be used. Most Parties favoured a formal agreement between Ofgem and the REC Code Manager delivery option 2, (a formal agreement with Ofgem), citing efficiency and alignment with existing reporting obligations. • Delivery option 2 was widely preferred due to its reduced burden on Energy Suppliers and alignment with Ofgem's existing reporting structures. A minority of respondents favoured delivery option 1, citing simplicity and avoidance of new data-sharing mechanisms, though concerns about duplication and cost were noted. • Respondents noted that the proposed change will require Energy Suppliers to either share existing CoO data via Ofgem or submit it directly to REC, depending on the chosen delivery option. Impacts varied depending on whether Energy Suppliers already collect and report this data, with some indicating readiness and others requiring system changes. • Costs ranged from nil to up to £50k, depending on the delivery option chosen and the Energy Supplier's current reporting setup. Benefits that were included by respondents included streamlined compliance, reduced duplication, and improved visibility for performance assurance, particularly if delivery option 2 was to be chosen. • Lead times varied amongst Energy Suppliers and were dependent upon the chosen delivery option. Delivery option 2 would require minimal or no lead time for most Energy Suppliers, while delivery option 1 (Energy Suppliers submitting the reporting directly to the REC via the REC Portal) could require up to three months for development and testing. Several respondents recommend aligning implementation with Ofgem's quarterly reporting schedule to avoid unnecessary administrative burden. • Risks acknowledged by respondents included potential duplication of reporting, misalignment of data formats, and delays in implementation if formal agreements are not finalised. Assumptions were made around the availability of existing data and consistency in reporting requirements, and dependencies relating to Ofgem's cooperation and the finalisation of the reporting solution were noted by respondents. No major issues were raised beyond those noted above.

12 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

12.1 RISKS AND ISSUES

No risks or issues have been identified at this stage.

12.2 ASSUMPTIONS AND DEPENDENCIES

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
R0254.A001	Backdated Reporting	It is assumed that REC Performance Assurance will require backdated reporting of an Energy Supplier's CoO's. The assumed date that the data will need to be backdated would be a date as close to the R0155 implementation as possible that also recognises that the Ofgem RFI is quarterly.	Ongoing – this has been confirmed as the preference during the Business Case Assessment following engagement during the Service Provider and Party impact assessment. The decision to report from 01 July 2025 will now be consulted on. This ties in with the Ofgem RFI submission due on 14 November 2025.

NO.	DEPENDENCY	NOTES	STATUS
R0254.D001	Formal Agreement with the Ofgem	The chosen delivery option, and the ongoing requirements for Energy Suppliers, will be dependent upon if, and when, a formal agreement to share the Ofgem Non-Domestic RFI between the Authority and the Code Manager is put in place.	Ongoing – final solution to be confirmed following engagement between Code Manager and the Authority. However, the proposed solution at consultation has been drafted and developed to allow a formal agreement to be made post-implementation, and for the reporting to be amended as such without a separate Change Proposal.

13 BUSINESS CASE ASSESSMENT

13.1 COSTS

COSTS	DESIGN COSTS	BUILD COSTS	TESTING COSTS
REC PERFORMANCE ASSURANCE	£6,680	£10,350	£5,100

Estimated costs total £22,130 for all associated activities. 13 FTE days are also anticipated for design, test and build activities.

REC Performance Assurance have also stated than any on-going operational costs, beyond those outlined above, will be part of the Performance Assurance Operating Plan (PAOP) and subject to prioritisation by PAB. These will be subject to availability of the required reports and volume of PAB interventions and escalations required for cases of non/late submission and/or cases over threshold.

13.2 BENEFITS

TANGIBLE BENEFITS	BENEFITS DESCRIPTION
FINANCIAL SAVINGS FOR MARKET PARTICIPANTS	The proposed solution and approach will significantly reduce duplication of effort and system requirements for reporting, resulting in lower compliance and operational costs for Energy Suppliers. By utilising the existing Ofgem RFI, the need for additional system development or manual data reconciliation is minimised, potentially delivering further financial savings for impacted Market Participants.
QUICKER ISSUE IDENTIFICATION AND RESOLUTION	Through the Non-Domestic CoO reporting, the Code Manager will be able to promptly identify any outliers or instances of non-compliance within the CoO process. This enables the timely and proportionate application of Performance Assurance Techniques (PATs), helping to ensure that Energy Suppliers meet their obligations and avoid causing detriment to Consumers. Additionally, this approach supports faster follow-up actions by the Code Manager, enhancing both market responsiveness and the effectiveness of assurance activities.
REDUCED BURDEN ON ENERGY SUPPLIERS	By aligning Non-Domestic CoO reporting with the existing Ofgem RFI, this Change Proposal reduces the administrative burden on Energy Suppliers by eliminating the need for duplicate submissions. This burden could be further eased if a formal agreement is established between the Code Manager and Ofgem, allowing direct access to the relevant data and streamlining the reporting process further for both Energy Suppliers and the Code Manager.

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
ENHANCED EFFICIENCY IN PERFORMANCE ASSURANCE AND RELATED ACTIVITIES	The proposed solution will enhance the efficiency and effectiveness of Performance Assurance monitoring the Non-Domestic CoO process. By enabling the use of existing data to identify outliers or anomalous behaviour, the Code Manager can conduct targeted follow-ups, improving the application PATs. This supports the timely identification and resolution of issues, helping to mitigate the risk of systemic problems within the CoO process. Furthermore, by linking to the Ofgem RFI, the solution establishes a framework for integrating external regulatory data into REC processes. This strengthens the operation of the Code, particularly in relation to Performance Assurance, and provides the flexibility for the Code Manager to adapt its monitoring approach in response to future changes in regulatory reporting or market conditions. Importantly, the inclusion of backdated monitoring capability ensures continuous oversight of the CoO process, avoiding gaps in assurance between the implementation of R0155 and the proposed implementation date of this Change Proposal.
ENHANCED MARKET CONFIDENCE	The proposed solution reflects a proactive, data-driven approach to monitoring Energy Supplier performance. By enabling early identification of potential issues, it reinforces stakeholder confidence, particularly among Energy Suppliers, Non-Domestic Consumers, and Ofgem, that Energy Suppliers are fulfilling their obligations and that the REC Code Manager is committed to transparency and accountability. This approach will help strengthen trust and enhance overall confidence in the market.
IMPROVED REGULATORY ALIGNMENT	The proposed solution aligns the REC's Performance Assurance monitoring of the Non-Domestic CoO process with Ofgem's existing reporting framework and regulatory expectations. This alignment reduces duplication and promotes consistency in data interpretation. Additionally, the approach develops stronger collaboration between the Code Manager and Ofgem, contributing to a more cohesive and united regulatory environment. This collaboration could be further strengthened through a formal agreement between the Code Manager and Ofgem.
STAKEHOLDER ENGAGEMENT AND R0155 COMMITMENTS	This change and its proposed solution reflect the feedback received from stakeholders and the outcomes of the R0155 consultation process. This Change Proposal reinforces the legitimacy and inclusivity of R0155, while also upholding the commitments made by the Code Manager to Market Participants during the development of R0155.

13.3 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 implementation of this change will incur minimal costs, primarily related to updating internal processes and systems to incorporate Ofgem RFI data. These costs are expected to be low and manageable. In contrast, the benefits are substantial. The change will reduce the administrative and compliance burden on Energy Suppliers by eliminating duplicate reporting requirements. This will also improve the efficiency and effectiveness of Performance Assurance activities by enabling targeted monitoring using existing data. Additionally, it avoids the need for costly system development or manual data reconciliation, ensures continuous monitoring coverage, and strengthens regulatory alignment and collaboration between the Code Manager and Ofgem. Overall, the benefits significantly outweigh the costs, making this a cost-effective and strategically valuable change.

14 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 by enabling ongoing monitoring of the Non-Domestic CoO process using data from Ofgem's Non-Domestic Market Monitoring RFI. This ensures the Code Manager can identify outliers and non-compliance post-R0155 implementation, as originally intended.
- The cost and effort to implement the change are minimal, involving updates to the PARC and the potential formal agreement and coordination with Ofgem. These are proportionate to the benefits, which include reduced reporting burden for Energy Suppliers, avoidance of duplicate submissions, and the avoidance of costly manual reconciliation or system development.
- If this Change Proposal was not to be implemented, it would result in a gap in monitoring between the R0155 implementation (27 June 2025) and the proposed implementation date of this change (07 November 2025), potentially leading to undetected issues and Consumer detriment. Implementation ensures continuous oversight and supports timely intervention.
- The solution delivers positive outcomes for Consumers by improving Energy Supplier accountability and market responsiveness. The change also enhances operational efficiency by utilising existing regulatory data and aligning REC processes with Ofgem's expectations.
- Considering the low implementation cost, stakeholder support, and clear operational and Consumer benefits, as set out in sections 13 and 14 of this Change Report, there is a positive business case for this Change Proposal.

15 APPENDIX

CHANGE PROPOSAL	Link
RELATED CHANGES	R0155 – Change of Occupier: Evidentiary Standards and Timescales R0232 – Non-Domestic Change of Occupier SDEP Screens (R0155 Solution)
OFGEM NON-DOMESTIC RFI (CHANGE OF OCCUPIER REPORTING EXTRACT)	Link
ANY OTHER DOCUMENTS / LINKS	R0155 – Change Report (Final Recommendation) Schedule 33 – Non-Domestic Change of Occupier Performance Assurance Reporting Catalogue Performance Assurance Methods and Techniques

16 GLOSSARY

TERM	DEFINITION
Change of Occupier	means that the Consumer at a premises has changed (or is due to change).
Non-Domestic Consumer	has the meaning given to 'Non-Domestic Customer' in the Energy Supply Licences.
Office of Gas and Electricity Markets (Ofgem)	Ofgem is the regulator for Britain's gas and electricity industries overseen by the Gas and Electricity Markets Authority (the Authority).
Performance Assurance	means the activities undertaken by the Code Manager and the REC PAB in accordance with the Performance Assurance Schedule.
Performance Assurance Operating Plan (PAOP)	means the plan of that name approved by the REC PAB, as described in the Performance Assurance Schedule.
Performance Assurance Technique (PAT)	means any provision or process that may be employed by the REC PAB and/or the Code Manager in order to mitigate Retail Risks in accordance with the Performance Assurance Schedule.