RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0257 CHANGE TO REC FOR DATA PROCESSING OUTSIDE OF EEA

On 27 June 2025 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0257.

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	22/07/2025
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Flo Monea

DATE CONSULTATION ISSUED	27/06/2025
RESPONSE DEADLINE	18/07/2025

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We are inclined to agree with this proposed change on the basis that the change will bring the REC into line with other code bodies whilst still requiring the relevant Data Protection laws to be adhered to. Currently with the extra layer of approvals required delays the process for parties in processing data.	Noted. Thank you for your response.
IMServ Europe Ltd Metering Equipment Manager	Yes	Noted. Thank you for your response.

Question 3:	Do you agree with the proposed implementation approach (BIG BANG)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree.	Noted. Thank you for your response.
IMServ Europe Ltd Metering Equipment Manager	Yes	Noted. Thank you for your response.

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**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree that there should be no costs as it is a case of removing legal text from the REC code.	Noted. Thank you for your response.
IMServ Europe Ltd Metering Equipment Manager	Yes	Noted. Thank you for your response.

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 Change Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We agree that the change proposal should be subject to self-governance approval on the basis that: • The proposed solution is fully formed, and it appropriately resolves the original Problem Statement; • There are no costs associated with the implementation of this change or ongoing operations; and • The impact of this Change Proposal not being implemented causes a delayed approach for any party wanting to process Data outside of the EEA.	Noted. Thank you for your response.

IMServ Europe Ltd Metering Equipment Manager	Yes	Noted. 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 7 November 2025? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree.	Noted. Thank you for your response.
IMServ Europe Ltd Metering Equipment Manager	Yes	Noted. Thank you for your response.

Question 5:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	NA	Noted. Thank you for your response.
IMServ Europe Ltd Metering Equipment Manager	No	Noted. Thank you for your response.