RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0283 ANNUAL ADDRESS MANAGEMENT PLAN UPDATES

On 23 October 2025 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0283 – Annual Address Management Plan Updates.

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	V1.0
RESPONSE TYPE	Non-Confidential
DATE ISSUED	04/12/2025
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Bela Ashworth

DATE CONSULTATION ISSUED	23/10/2025
RESPONSE DEADLINE	14/11/2025

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Smart DCC (DCC)	Mostly yes. DCC supports the initiative to further improve address data quality. The proposed solution states that 'the CRS Provider shall provide to the REC PAB and the Code Manager such information as the Code Manager reasonably requests on its compliance with the Address Quality Annual Plan and the Address Prioritisation Matrix.' Noting that the Code Manager has advised DCC that the APM is unlikely to contain CRS Provider targets, what compliance evidence will be required? Also, DCC is currently obligated to provide an annual report (Schedule 29, Clause 2.11) to the Code Manager in regard to its compliance with the previous iteration of the AQP. Can the Code Manager please confirm the impact on the current obligation? Furthermore, the 'two-pronged' consultation will potentially require high level APM references in the AQP as the draft AQP will be consulted on first. For the consultation to be meaningful and hold value, the contents of the AQP should be as complete as possible (though additional changes may be made in response to consultation feedback).	Thank you for your comments. Evidence for compliance for the CRS Provider will continue to be via the APQ. If amendments are required, they will be done through another Change Proposal. There is no impact on current obligations surrounding the annual report. Current obligations regarding the AQP and as outlined in Schedule 29 will continue to apply to the DCC.
SP Energy Networks (Distribution Network Operator)	SPEN agree with the proposed solution in principle, and would welcome the introduction of the matrix, and targeted areas of data cleanse by industry parties.	Thank you for your comments. R0283 is only intended to introduce the concept of the address management matrix. Specific

	We are slightly concerned around the introduction of specific targets in terms of what this would mean for addition resources, as there is no guidance in this proposal as to what this would look like and if this would be assessed on items investigated or items updated/resolved.	targets, as well as further guidance on the population of the matrix, will be determined in future Change Proposals and following industry engagement.
National Grid Electricity Distribution (Distribution Network Operator)	We are inclined to agree with the intent of the proposed solution and recognise the benefits it brings in terms of improving clarity and governance around the annual address management plan. By establishing a framework for better address data quality is on the whole a positive for the market and consumers. However, we have some reservations regarding the potential introduction of performance targets or obligations on DNOs as part of the Address Prioritisation Matrix. While we support collaborative efforts to improve address data, any targets placed on DNOs should be proportionate, clearly defined, and consider the practical limitations of existing systems and processes. We welcome further engagement within I0200 understanding that this proposal is just to create the initial matrix whilst providing a governance framework that surrounds the address management plan.	Thank you for your comments. R0283 is only intended to introduce the concept of the address management matrix. Specific targets, as well as further guidance on the population of the matrix, will be determined in future Change Proposals and following industry engagement.
Xoserve (GRDA / CDSP)	We understand that this change is establishing the Address Prioritisation Matrix framework principle and then the activities to be undertaken for each category of issue will be subsequently determined via consultation. We recognise the complexity of the address processes, but in order to provide support this change we feel that this change should set out the criteria against which activities defined within the Address Prioritisation Matrix will be established and the nature of the consultation processes that will be followed to ensure that full Impact Assessments can be conducted by impacted parties. We	Thank you for your comments. R0283 is only intended to introduce the concept of the address management matrix. The process for consultations and service provider impact assessments will be determined in future Change Proposals and following industry engagement.

	consider that the criteria to establish these should be part of the solution for this change. Until the criteria for items being added to the Address Prioritisation Matrix are established, we have reservations supporting objectives being placed on parties. As the CDSP, Xoserve have expended a reasonable amount of time to review MPLs with a view to establish processes that will support the CRS in managing the REL. I acknowledge that more time could have been attributed to the activities, but we needed to establish robust processes given the importance of the MPL. We also acknowledge that since this time and effort that was expended the CRS has sought to engage on the subject of the REL and we welcome the additional insights that this engagement has provided in relation to REL derivation. There are distinct stages within the REL derivation that parties cannot be responsible for, and so if there is any inference that the end of the process is the derivation of a REL then the extent to which parties can influence this is questionable, and as such we have reservations and cannot agree with the proposed solution. In previous reviews undertaken we have provided updated MPLs where addresses still haven't met the 'gold standard' REL address match but that we are satisfied are valid locations of the Meter Point. REC Parties cannot be responsible for match activities. We welcome recent insights provided by the CRS team as to reasons why RELs are not matched to MPLs, and we will continue to work with the team at CRS to assess whether any of the criteria that prevent REL derivation can be removed from the MPL without degradation of the MPL.	

	The creation of the REL was specifically introduced to recognise that the MPL is not a recognised address or because the MPL is satisfactory to fulfil the GTs objective to maintain a record of where the meter point is, therefore it should be acknowledged that there will be instances that the MPL will not result in derivation of the REL.	

Question 2:	Do you agree with the proposed implementation approach (BIG BANG)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Smart DCC (DCC)	Yes.	Thank you for your comments.
SP Energy Networks (Distribution Network Operator)	Yes, we agree with the implementation approach	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, if you are making this change to provide clear obligations for the 2026 annual plan then the implementation needs to tie in with this.	Thank you for your comments.
Xoserve (GRDA / CDSP)	We do not comment specifically on the implementation approach. As referenced above, we have reservations related to this change without better information related to establishing the criteria to determine the items that will be added to the Address Prioritisation Matrix, and the assessment processes afforded to parties for each such addition.	Thank you for your comments.

Question 3:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Smart DCC (DCC)	Mostly yes. The change will result in no additional costs for DCC, however the to-be-agreed contents of the APM may incur costs / impacts which will require impact assessment on a case-by-case basis by the impacted party. Note that the Change Report states that gaps have 'hampered progress on cleansing address data.' During this financial year, DCC has manually matched 36,674 addresses. This forms part of the current total of 208,026 matched addresses in FY 2025/2026 to date.	Thank you for your comments.
SP Energy Networks (Distribution Network Operator)	Yes, we have identified no additional costs/benefits in relation to this particular proposal, however there is reference to future ones that will potentially impact costs when implemented depending on the proposal for address data cleanse target. There is not enough detail of the repercussions to be able to assess this. If we are looking at only the update to the REC Documentation and the introduction of the matrix then there would be no cost	Thank you for your comments. R0283 is only intended to introduce the concept of the address management matrix and the governance framework for it. The specific address data cleanse targets and other requirements of the matrix will be determined in future Change Proposals – including within I0200, and following further industry engagement.
National Grid Electricity Distribution (Distribution Network Operator)	In terms of costing the Code Manager has stated that there will be none in relation to this change.	Thank you for your comments.

	In the respect of benefits of this change we believe it will provide clarity on roles and processes for the annual address management plan, as well as providing a governance framework for any related project.	
Xoserve (GRDA / CDSP)	The Address Prioritisation Matrix itself will not result in additional costs. However, each entry within the Matrix will result in costs for parties as this will create specific areas of focus that will require assessment to define processes and may require system solutions.	Thank you for your comments.

Question 4:	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**
Smart DCC (DCC)	Yes.	Thank you for your comments.
SP Energy Networks (Distribution Network Operator)	Yes	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We agree that the proposed change appears suitable for Self-Governance, as it primarily introduces governance and process improvements without direct impacts on systems or significant cost implications for participants.	Thank you for your comments.
Xoserve (GRDA / CDSP)	We have no comments on whether authority or self governance.	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 determination by the Authority following approval by the Change Panel?
The Code Manage included this question in error. Please refer to Question 4.	

Question 6:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 27 February 2026? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Smart DCC (DCC)	Yes with the following caveats. DCC agrees that the change should be implemented, however this implementation date has the potential to cause issues. Please note that the DCC, acting as the Switching Operator, will be finalising the 2026-2027 Address Quality Plan during the lead up to R0283 implementation. The proposed AQP contents will have been consulted upon during December 2025 / January 2026 which may result in complications if references to R0283 are to be made in the document, as the R0283 vote will take place during the consultation window. As such, DCC suggests making high level references to the APM in the 2026-2027 AQP. Please note the 2026-2027 AQP timeline states that the 2026 – 2027 AQP and supplementary report (DCC response to consultation responses) will be provided to the REC Performance Assurance Board (PAB) and Code Manager on the same date as the proposed R0283 implementation (27 February 2026).	Thank you for your comments. We agree that the CRS Provider could reference the APM in the 2026-2027 AQP. The Code Manager notes that the AQP will be discussed at the February 2026 PAB. As this Change Proposal is only to facilitate the concept of the APM, the implementation of R0283 on the same day does not cause concern.

SP Energy Networks (Distribution Network Operator)	We have no objection to the implementation date of 27th February 2026	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, if you are making this change to provide clear obligations for the 2026 annual plan then the implementation needs to tie in with this.	Thank you for your comments.
Xoserve (GRDA / CDSP)	We acknowledge that this is establishing the Address Prioritisation Matrix only and that separate consultations will establish the content of the matrix. We are not aware of the timeline or process that will be followed for introduction for such content, nor do we understand the nature of such proposals. I think the above should be set out within this change proposal in order to assess this change proposal. The complexity of establishing processes to manage addresses should not be under estimated.	Thank you for your comments. We note your concerns regarding the timeline and process for consultations; this will be set out following further engagement with industry and RECCo.

Question 7:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Smart DCC (DCC)	N/A	Thank you for your comments.
SP Energy Networks (Distribution Network Operator)	None	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We would like to note a concern regarding the introduction of the Address Prioritisation Matrix.	Thank you for your comments.

	Whilst the matrix itself is not populated as part of this proposal, its future use could lead to performance targets or obligations for DNOs. We believe these should be developed collaboratively and proportionately to ensure they are practical and do not create unintended compliance or operational challenges. We would welcome further engagement.	The Code Manager will be engaging with industry further within I0200 and as part of the wider address management project. We will also communicate future engagement opportunities to Parties via the REC weekly bulletin.
Xoserve (GRDA / CDSP)	N/A	N/A