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

CHANGE REPORT

R0286 – CLARIFICATION ON DETAILED IMPACT ASSESSMENT ACTIVITIES

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	26 June 2026
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	CHANGE PANEL	**CHANGE PATH**	SELF-GOVERNANCE
PRIORITY STATUS	LOW	**URGENCY**	STANDARD
IMPACTED STAKEHOLDERS	All Rec Parties and All Service Providers		

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

This Change Propsal seeks to formalise the Responsible Committee's approval of a change to release funds for the lead Service Provider to complete design upfront as part of the preliminary impact assessment (PIA).

CODE MANAGER MINDED-TO-POSITION

The Code Manager's minded-to-position is that the Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 26 June 2026.

RETAIL ENERGY CODE

CONTENTS

Code Manager minded-to-position 1
1 Summary 3
2 Problem Statement 3
3 Impacts 4
4 Cross-Code Impacts 4
5 Proposal Plan 4
6 Stakeholder Engagement 5
7 Priority Status and Urgency 5
8 Proposed Solution 5
9 Draft Legal Text 5
10 Risks, Assumptions, Issues and Dependencies 6
11 Business Case Assessment 6
12 Case for Change 7
13 Appendix 8
14 Glossary 8

BACKGROUND

1 SUMMARY

The first complex technical Change Proposal, R0067 – Introduction of CSS Refresh Functionality, encountered a few challenges within the design and implementation process. This change was scheduled for implementation on 06 December 2023. However, it was deployed with defects and was not fully operational until February 2024. Following this, the Code Manager held discussions, and a formal “lessons learned" session with all Service Providers and identified several challenges with the technical change process.

This approach was initially trialled with R0080 - Improvements to ‘Failed to Deliver’ CSS Messages. The recommendation was completed by the Technical Design Authority (TDA). Feedback was then sought from the Technical Expert Panel (TEP), and RECCo subsequently approved the release of funds for the Service Provider to complete the design as part of the PIA. The detailed design documents were then able to be shared with industry following the completion of the Detailed Impact Assessment (DIA) and prior to the Party impact assessment stage, which highlighted several clarifications required within the design. This enabled the documents to be updated in advance of approval and ensure that the design was fit for purpose across the industry. The full Change Proposal has subsequently been approved and was implemented in June 2025.

2 PROBLEM STATEMENT

The technical change process currently creates five challenges which can be attributed to the timing of the detailed design PIA and DIAs. These are as follows:

1. **Lack of Clarity**

Where Service Providers and impacted Parties are dependent on each other, it is difficult for them to properly impact assess a change when there is no clarity on the design at the point of a DIA and when PIAs are issued.

2. **Limited Feedback**

Where design happens post a change being approved, there is no formal opportunity for impacted stakeholders to provide feedback and amendments for the design to ensure that it meets their needs.

3. **Misalignment**

Where designs are not shared early, assumptions can be made by all impacted Parties, this can be discovered late in the development phase which may cause rework and/or delays to testing or deployment.

4. **High Contingency Costs**

Where there is uncertainty over design, Service Providers built in a high degree of contingency costs to ensure they have sufficient commercial coverage when completing a DIA.

5. **Inaccurate Timelines**

Completing an end-to-end implementation timeline as part of a DIA without having certainty on design can result in longer timelines being provided, lengthening the change process overall.

3 IMPACTS

CONSUMERS
All Consumers

REC SERVICE PROVIDERS
All Service Providers

RECCO / REC CODE MANAGER
REC Code Manager

REC PARTIES AND SERVICE USERS
All REC Parties

REC DOCUMENTS / PRODUCTS
Schedule 5 – Change Management

MHHS
No MHHS impacts have been identified by the Code Manager.
The benefits gained through the additional clarity would be expected to be similar for the Data Integration Platform (DIP) Manager and DIP Service Provider, similarly to other Service Providers.

4 CROSS-CODE IMPACTS

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

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**01 Dec-25**	**28 Feb-26**
	Solution Analysis	Completed	Completed
	Solution Development	Completed	Completed
	Legal Drafting and Review	Completed	Completed
Change Proposal		**01 Mar-26**	**20 April-26**
	Business Case Assessment	Completed	Completed
	Consultation	March	March
	Final Determination	April	April
Voting		**21 Apr-26**	**21 Apr-26**
	Appeal Window	22 April	06 May

This Proposal Plan has not included a Party impact assessment because there are no impact or operational changes required by REC Parties. REC Parties will be able to engage and submit views as part of the industry consultation.

6 STAKEHOLDER ENGAGEMENT

The Code Manager will engage with the Change Issues Group as and when appropriate throughout the development of this change. Throughout the progression of this change, the Code Manager will also remain informed about possible changes to the approach in line with Energy Code reform.

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	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	7	7
		Legal and Regulatory Compliance	0	14	0
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		1		8
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	0	10	0
				Overall Priority Score (rounded)	94

Priority Status	LOW
Change Proposal Type	STANDARD

This change was assigned a priority status of ‘low’ due to its priority scoring of 94.

SOLUTION

8 PROPOSED SOLUTION

The solution proposed is to establish a new approach with the lead Service Provider completing design up front as part of the PIA. The decision to undertake design will be based on the level of complexity of the change and the strength of the business case. The changes will be assessed on a case-by-case basis, if the change is a suitable candidate for design as part of the PIA, a TDA recommendation will be created. This will then be presented to the Responsible Sub-Committee for approval to release the funds for design as part of the PIA. Where the committee does not approve the release of funds, the change will continue down the standard change route and design will be completed following the approval of the full Change Proposal.

To enable and reflect this new approach, the Code Manager will update the REC Schedule 5 – Change Management.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0286 can be found here.

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PRELIMINARY ASSESSMENT

10 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

10.1 RISKS AND ISSUES

The Code Manager sought legal advice on whether some level of details was needed in cases where a Change Proposal would be rejected or withdrawn after the design activity would have been approved up front. In the case of a rejection following approval of design up front, the associated costs would still be paid for, as the design up-front activity would have already be completed before the decision to reject comes into effect. In the case of a withdrawal, the Code Manager and the Responsible Sub-Committee would consider the money spent and agree on where to use the surplus. The advice indicated that this level of detail in the legal text was not needed for withdrawal cases.

No other risks, assumptions, issues and dependencies have been identified by the Code Manager.

11 BUSINESS CASE ASSESSMENT

11.1 COSTS

There are no costs associated with this Change Proposal.

11.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
IMPROVE VISIBILITY AND QUALITY SURROUNDING COMPLEX TECHNICAL CHANGES	The implementation of this Change Proposal should provide visibility and improve the quality of complex technical changes delivered through the REC. Currently, design would happen after a change has been approved. This does not allow impacted stakeholders nor Service Providers to provide feedback nor amendments to the design to ensure it meets their needs. This change will formalise the design first approach for technical changes, improving the speed and efficiency of complex technical changes which will indirectly benefit Consumers.
IMPROVE CLARITY WITHIN THE DESIGN OF A CHANGE	The implementation of this Change Proposal should provide clarity on the design at the point of a DIA and prior to the Party impact assessment stage, enabling to futureproof issues that could arise. Currently Service Providers and impacted Parties who are dependent on each other cannot properly impact assess a change. By receiving detailed design documents prior to the Party impact assessment, impacted Parties will be aware of any further details that are needed within the design. This change should therefore provide assurance that the design is fit for purpose across the industry at an early stage of the process.

IMPROVE ACCURACY AND TIMELINES WITHIN THE CHANGE PROCESS	The implementation of this change will reduce additional timelines by providing certainty on the design and better alignment to the plan before an end-to-end implementation timeline can be defined. Currently, assumptions made by all impacted Parties are discovered late in the development phase which may cause rework and/or delays to testing or deployment.
IMPROVE COST-EFFECTIVENESS SURROUNDING THE ACTIVITIES IN THE CHANGE PROCESS	The implementation of this change should lead to a more efficient technical change process, resolving issues that are detrimental to REC Parties, and improving cost-effectiveness and more accurate costs. Currently, when there is uncertainty over the design of a change, Service Providers built in a high degree of contingency costs to ensure they have sufficient commercial coverage when completing a DIA. By implementing this Change Proposal, a robust and confident approach that supports more accurate costs will be ensured.

11.3 COST BENEFIT ANALYSIS

There are no central system costs and no expected costs to Parties for implementing this Change Proposal. As such, the cost-benefit analysis for this Change Proposal is based upon the four intangible benefits detailed above.

12 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:

- Is both viable and implementable, and effectively resolves the problem statement;
- has no associated central system costs and no associated Party costs;
- has proportionate effort required for implementation;
- should improve visibility, quality and efficiency of complex technical changes delivered through the REC;
- should improve clarity within the design of complex technical changes;
- should improve accuracy and timelines instead of lengthening the change process overall; and
- should improve the cost-effectiveness of the activities in the change process.

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13 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
RELATED CHANGE(S)	R0067 –Introduction of CSS Refresh Functionality R0080 - Improvements to 'Failed to Deliver' CSS Messages

14 GLOSSARY

TERM	DEFINITION
Centralised Registration Service (CRS)	means the services provided pursuant to Condition 15 (Incorporation, delivery and provision of the Centralised Registration Service) of the DCC Licence, being the services provided under this Code by the CSS Provider, Switching Operator, CSS Certificate Authority and, until the end of the Post Implementation Period only, the Core Systems Assurance Provider and the CSS Systems Integrator.
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.
Change Proposal	means a proposal to change this Code made in accordance with Clause 11 of the main body of this Code or the Change Management Schedule.
Data Integration Platform (DIP)	means the data integration platform made available pursuant to the BSC.
DIP Manager	means BSCCo or such other entity as is responsible under the BSC for managing the Data Integration Platform.
Party	means, from time to time, an Original Party or a New Party that has not at that time ceased to be a Party in accordance with Clause 17 of the main body of this Code.
Responsible Sub-Committee	is described in Paragraph 2.2 of the Change Management Schedule