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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0298 – ANNUAL REVIEW OF THE PARC (2025-26)

On 21 January 2026 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0298.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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RESPONSE TYPE	Non-Confidential
DATE ISSUED	12 February 2026
RESPONSIBLE COMMITTEE	REC Performance Assurance Board
LEAD ANALYST	James Hardy

DATE CONSULTATION ISSUED	21/01/2026
RESPONSE DEADLINE	11/02/2026

Question 1:	Do you agree that the proposed solution resolves the problem statement? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree with the proposed solution	Thank you for your response.
ScottishPower Energy Retail (Energy Supplier)	We have reviewed the problem statement and the proposed updates to the PARC, and we are satisfied that the outlined changes appropriately address the issues identified. The inclusion of additional data sources, the amendments to reporting frequency, the incorporation of ERDS reports, and the general housekeeping updates collectively offer a clear and comprehensive solution aligned with current Performance Assurance requirements. However, we would like to reiterate the longstanding concerns previously raised by ourselves and other Parties regarding the 1431 Gaining Supplier Switching Data and 1441 Losing Supplier Switching Data MPxN-level reporting included within the PARC. These concerns remain outstanding and have yet to be resolved. In this context, and in addition to the proposed amendment to modify the frequency of the 1431/1441 files to "on demand," we consider it appropriate that these reports be revised to require aggregated data rather than MPxN-level information.	Thank you for your response. The scope of R0298 is to make the amendments approved in the PAB Annual Review as per their requirements in the PAOP. However, your concerns have been noted and will be raised with the Performance Assurance Board alongside the Change Report for R0298. The REC Change Process is also available should you wish to raise this further.

SP Energy Networks (Distribution Network Operator)	We retain the view, as submitted in our response to D0201, that reporting on data misalignment issues would be best placed in terms of monitoring in CSS, as this is where the tickets originate. However, we believe that the monitoring of this area does provide a view of the issues and allows appropriate tracking of the scale of issues and resolutions.	Thank you for your response.
SSE Energy Supply Limited (Energy Supplier)	Yes, SSE agrees that the Performance Assurance catalogue should be reviewed on an annual basis.	Thank you for your response.

Question 2:	Do you agree with the Code Manager's Case for Change? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree	Thank you for your response.
ScottishPower Energy Retail (Energy Supplier)	We agree with the assessment provided by the Code Manager. The rationale set out clearly demonstrates that the proposed solution is viable, implementable, and effectively addresses the problem statement. In addition, the increased clarity for REC Parties and the reduction in the risk of errors together with the proportionate and cost-effective nature of the solution, provides further justification for progressing with	Thank you for your response.

	the proposal. We are therefore supportive of the proposed solution and the case for change as outlined.	
SP Energy Networks (Distribution Network Operator)	Yes, we are supportive of the case for change	Thank you for your response.
SSE Energy Supply Limited (Energy Supplier	SSE is unclear on the case for change the frequency of 1441/1431 to on demand. Please can you provide the reasons behind this decision and what circumstances would trigger an on-demand request.	This was a decision taken by the Performance Assurance Board. The Lead Analyst has reached out to REC Performance Assurance and the Performance Assurance Board with your query and will reach out directly once a response has been received.

Question 3:	Do you expect that the implementation of this Change Proposal will result in any impacts (operational or financial) to your organisation. If so, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We believe there will be no direct impact to our organisation.	Thank you for your response.
ScottishPower Energy Retail (Energy Supplier)	As a Supplier, we do not anticipate that the implementation of this Change Proposal will result in any operational or financial impact on our organisation.	Thank you for your response.
SP Energy Networks (Distribution Network Operator)	The implementation of this change will increase manual reporting required and will have additional cost associated. We anticipate the cost of the introduction of this to be low	Thank you for your response.

SSE Energy Supply Limited (Energy Supplier	No impacts identified.	Thank you for your response.

Question 4:	Do you agree with the proposed implementation date and approach? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree	Thank you for your response.
ScottishPower Energy Retail (Energy Supplier)	We are supportive of the proposed “big bang” implementation approach and agree with the suggested go-live date of 27 March 2026.	Thank you for your response.
SP Energy Networks (Distribution Network Operator)	Yes	Thank you for your response.
SSE Energy Supply Limited (Energy Supplier	Yes, SSE agrees with the implementation date and approach.	Thank you for your response.

Question 5:	Do you have any other comments on this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
ScottishPower Energy Retail (Energy Supplier)	In previous years, we, along with several other Parties, have raised concerns regarding the scope of information requested within the 1431 Gaining Supplier Switching Data and 1441 Losing Supplier Switching Data reports. These concerns persist, particularly in relation to data protection obligations, including the privacy and confidentiality of customer information, and the overarching principle of data minimisation. We remain of the view that the continued requirement to provide MPxN-level customer data to the Code Manager in this format has not been sufficiently considered or addressed. While we welcome the proposed modification to provide the 1431/1441 files on an 'on-demand' basis, we would be supportive of a broader redesign of these reports to ensure that they operate using aggregated data. In summary, and in addition to the changes proposed by the Code Manager, we believe that these reports should either be amended to request aggregated rather than MPxN-level information or otherwise be removed from the PARC entirely.	Thank you for your response. The scope of R0298 is to make the amendments approved in the PAB Annual Review as per their requirements in the PAOP. However, your concerns have been noted and will be raised with the Performance Assurance Board alongside the Change Report for R0298. The REC Change Process is also available should you wish to raise this further.
SP Energy Networks (Distribution Network Operator)	No further comments	Thank you for your response.
SSE Energy Supply Limited (Energy Supplier	No.	Thank you for your response.