REC Entry Assessment Information Pack

This document describes the process to become Qualified under the Retail Energy Code (REC). Qualification encompasses those wishing to become a REC Party and enter the market, as well as those applying for access to REC Services (EES/GES/CSS/GDCC).

This document covers different requirements for different Market Roles and REC Services; each applicant will additionally receive an Entry Assessment Plan tailored to their application.

Author:	The Code Manager
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RETAIL ENERGY CODE

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1. Document Information and Approvals

Version History			
Version #	**Date**	**Revised By**	**Reason for change**
1.0	19 May 2021	The Code Manager	Final version agreed with RECCo.
2.0	16 September 2021	The Code Manager	Clarification relating to non domestic customers
3.0	31 January 2024	The Code Manager	Updates based on types of applications received and feedback from applicants.
3.1	4 October 2024	The Code Manager	Signpost to MHHS arrangements and R0064 changes
4.0	25 November 2025	The Code Manager	Provide further clarity on interim and enduring Qualification process during and after the MHHS transition

2. Introduction

2.1. Purpose

To fulfil specific roles in the retail energy market, organisations must become Qualified. This can be for a specific Market Role e.g. Energy Supplier (ES), Distribution Network Operator (DNO), Gas Transporter (GT), or Metering Equipment Manager (MEM); or to enable access to a specific REC Service. Once Qualified, these organisations will be able to access the services governed by the REC and have obligations to meet under this code. The Qualification is specific to the Market Role the organisation takes, for example the access to services and obligations for an Energy Supplier is different to that of a MEM or Non-Party REC Service User such as a Meter Asset Provider.

This document is aimed at organisations that:

- Have already acceded to the REC and/or have access to REC Services;
- Do not currently operate in the gas or electricity retail market but wish to do so and will be required to accede to the REC and/or access some form of REC Services as part of their operations;
- Already operate in the gas and/or electricity retail market and now wish to operate in one, or more, additional market sectors or access additional REC Services; or
- Already operate in the gas and/or electricity retail market and are subject Controlled Market Entry (CME) Conditions.

Organisations that wish to become Qualified under the REC are referred to as ‘applicants’ throughout this document. This document describes in detail the REC Entry Assessment process, as further described in the REC Qualification and Maintenance Schedule.

Applicants need to perform specific tasks, as set out in this document, to facilitate the completion of the REC Entry Assessment process.

Successful completion of the REC Entry Assessment process is a pre-requisite for applicants to become Qualified under the REC. Energy Suppliers and Distribution Network Operators may qualify with no constraints or subject to CME.

An overview of the REC Entry Assessment process is set out below. This includes the section numbers where further details can be found.

2.2. REC Entry Assessment Process



In addition to the REC Entry Assessment process set out above, there is also an annual Maintenance of Qualification that participants will need to complete. There may also be occasions, such as after a material event, where additional Maintenance of Qualification activities are required. Further information on these requirements is noted in the Maintenance of Qualification Guidance document available on the REC Portal under 'Useful Documents'.

2.3. Governance

The governance of the REC Entry Assessment process is set out in the REC, and specifically the REC Qualification and Maintenance Schedule. The governance body for the REC Qualification and Maintenance arrangements is the REC Performance Assurance Board (PAB).

2.4. Applicability

This document details the requirements on those wishing to become Qualified under the REC, including Energy Suppliers, DNOs, MEMs, GTs, and Non Party REC Service Users..

This document is not applicable to Electricity Metering Operatives (EMOs) or Approved Meter Installers (AMIs); the qualification requirements for EMOs and AMIs can be found in the REC Metering Accreditation schedule, and a separate Metering Accreditation User Guide is maintained on the REC Portal.

MEMs are also subject to the REC Metering Accreditation Schedule and should read this document in conjunction with the Metering Accreditation User Guide.

3. Process Overview

There are multiple REC Services that you can apply to access, with associated Market Roles. You can specify which roles you are applying for and which services you wish to access when you apply. Your application will then be tailored to your specific circumstances.

You can subsequently apply for additional Market Roles and access if your business model changes.

3.1. Assessment stages

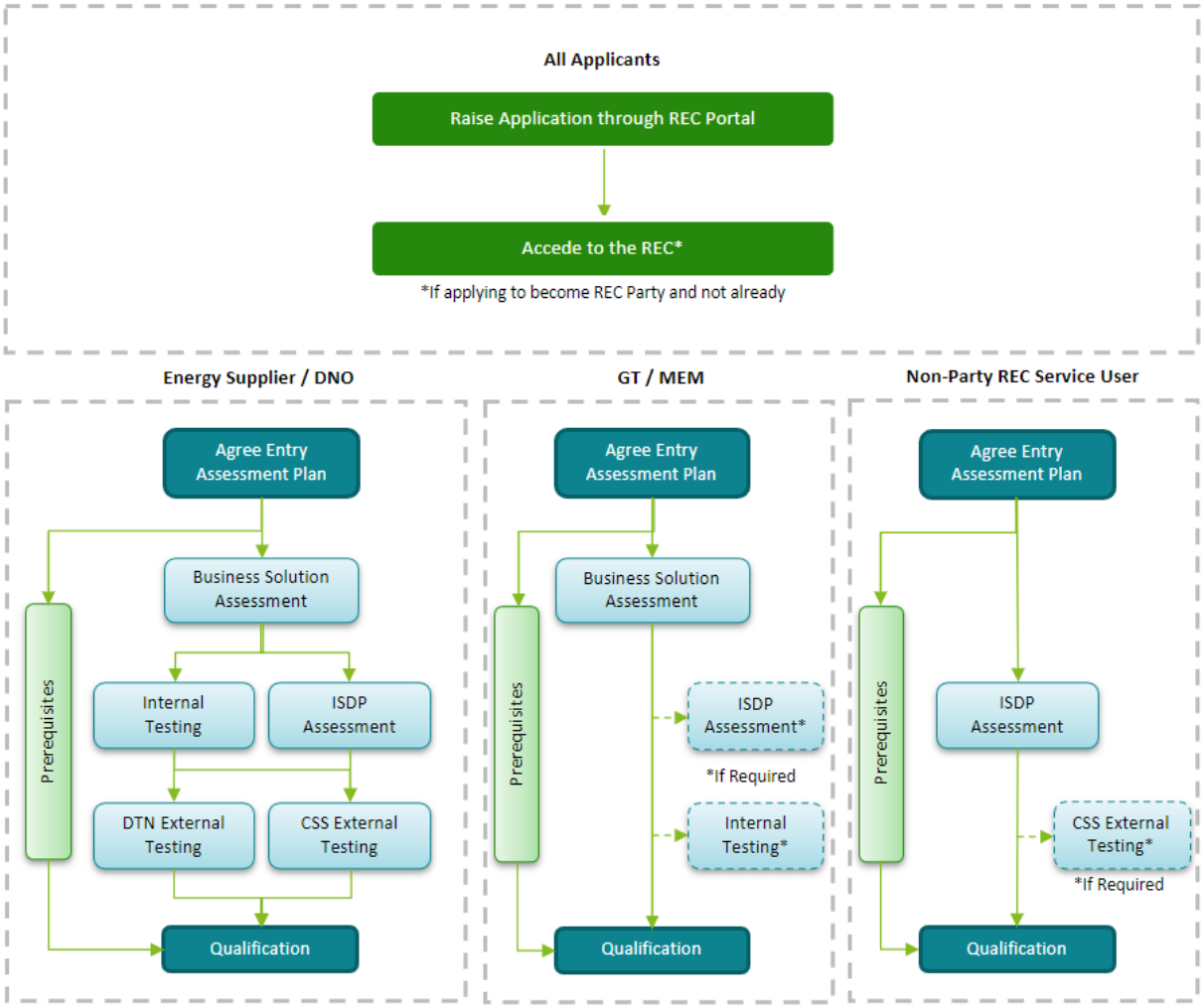
There are several stages that form part of the REC Entry Assessment process that you must complete in order to operate in the market.

Organisations may apply for multiple Market Roles or access to multiple REC Services. For each REC Service, there are onboarding activities required. These are set out in the relevant REC Schedule.

Where these applicants are not REC Parties (which is only applicable to the GDCC, Enquiry Services, and CSS), they will also need to sign an Access Agreement to become a Non-Party REC Service User.

For example, if you are applying to become a Dual Fuel Supplier, you would not be required to complete a separate Information Security and Data Protection Assessment for EES and GES access.

The flow chart below shows the individual flows that you must follow for each Market Role and REC Service User Category to become Qualified under the REC:



The Code Manager uses a risk-based approach to assessment. This means that the amount of evidence you are required to submit will vary based on what you are applying for, the way you are approaching meeting your requirements, and consideration of specific risk factors.

Risk factors vary by type of applicant and include (but are not limited to):

- the number of metering points that you plan to register (for Energy Suppliers);
- the complexity and commonality of the systems and business solution to be used;
- the volume of energy supplied;
- which REC Services you are applying for; and
- the experience of your organisation in the market.

Any information you are required to submit as part of this process will be done using the REC Portal. Further detail of what each stage entails is detailed in sections 5-10 of this document.

4. Logistics and Format

4.1. Logistical Arrangements

The Code Manager will provide team members to act as 'Assessors' at each stage of your REC Entry Assessment. These are collectively referred to as the 'Entry Assessment team' and will contact you to guide you through the REC Entry Assessment process.

You will in turn be required to provide the following:

- A co-ordinator to act as the main point of contact throughout the assessment; and
- The appropriate level of resources at each stage required to demonstrate to Assessors how compliance with REC Entry Assessment requirements is achieved.

If there are any difficulties in providing the above, these should be discussed with the Entry Assessment team.

If you wish to raise any questions or points around a specific Market Entry requirement or submissions, these should be raised to the Entry Assessment team through the Performance Assurance mailbox unless another communication method is agreed as part of the Entry Assessment Plan. General questions should be raised to your Operational Account Manager.

4.2. Format of Assessments

Most assessment work based on evidence provided by yourself via the REC Portal. The process and format employed is broadly as follows:

- Submission of information to the Code Manager through the REC Portal for each applicable stage. This will comprise of completed forms/questionnaires on the REC Portal together with uploaded supporting evidence and documents appropriate to the stage of assessment.
- Analysis of the submission by the Entry Assessment team against detailed assessment criteria.
- Where your submission does not comply with REC requirements or does not provide sufficient evidence to demonstrate compliance, the Entry Assessment team will request that additional information is provided.
- Review and progress meetings (exchanges of information and feedback) will normally take place electronically between yourselves and the Entry Assessment team. The following areas will be discussed, where applicable:
    - Walkthroughs of documentation, systems, business processes and underlying evidence.
    - Any findings and observations that have been raised within the REC Portal by the Entry Assessment team.

  - Any remedial/corrective actions you have raised within the REC Portal or proposed remedial/corrective actions not yet documented on the REC Portal where applicable.
  - Your progress on applying remedial/corrective actions, test progress and any issues that may affect the assessment; and

- Following completion of each assessment stage you will be notified via the REC Portal, with any outstanding issues from that stage clearly identified on the REC Portal. Where the Code Manager recommends that you do not progress to another stage of the process, you will be informed of this and the reasons why and may submit further evidence or opt to end the application.
- Should you disagree with an issue raised as part of the process or require clarification, you can raise this via the REC Portal. If required, a meeting will be arranged to discuss the issue.
- An appeals process also exists where you can appeal a decision or issue to the PAB. An appeals form is available via the REC Portal.
- When each applicable stage of the Entry Assessment is complete, or Entry Assessment is ended, the Code Manager will create a completion report summarising the tests completed and any issues outstanding on the REC Portal.
- PAB will then be notified of the Code Manager decision, along with any additional context and recommendations.

4.3. Issues

During the assessment, if the Entry Assessment team discovers any elements of the assessment of testing which do not meet the requirements it will raise one of the following:

- A follow-up, which is usually where we need more information or clarity on evidence provided.
- An observation, which is a point that requires action, but shouldn't prevent an application from progressing from the current stage.
- A finding, which is more significant and need to be addressed before an applicant completes Qualification, or completes the current stage of Qualification.

These will be raised within the REC Portal and will allow you to provide a response including the corrective action taken and the timeframe.

The applicant may seek clarification from the REC Code Manager on what actions need to be completed to clear an issue.

Corrective actions are uploaded to the REC Portal and reviewed by the Code Manager who will sign off completion of the action, or provide an explanation as to why it has not been completed.

5. Application

We have described below the stages of the entry process.

5.1. Entry Assessment Application Form

Required for all applicants.

This is the first step to becoming Qualified under the REC. The Entry Assessment application form is a simple form designed to signal your intent to start the process. It provides the Code Manager with information on you, your intended Market Role and/or what REC Services you are requesting access to.

To initiate the Entry Assessment process, you will make a formal application through the REC Portal.

If you wish to see the questions before completing an application you can look at the complete set of entry questions in the Entry Assessment Forms document in the REC Portal.

You must detail on the form all applicable Market Roles and/or REC Services you wish to hold and access, along with providing other information such as contact details of the contract manager and other operational contacts. Depending on the role you are applying for additional questions will be included. This will include the information required to start key assessment steps such as the information security and data protection assessment applicable to all REC Party applicants and Non-Parties applying to use enquiry services or the Green Deal Central Charging Database. For REC Parties it will also include information for the additional assessment steps required for these roles.

If you are already Qualified under the REC but wish to operate in other sectors of the market or access an additional REC Service which you are not currently Qualified for, you must also complete the Entry Assessment Application form.

The Code Manager will review the form, and where details are not complete will send you a message via the REC Portal to ask for these to be updated. They will then validate the form and make you aware if the application has been accepted or rejected.

If accepted, the Code Manager will confirm the status of your application and then hold a planning meeting with you, and other codes if required.

If you are not a REC Party and are applying to use an enquiry service, the Central Switching Service or the Green Deal Central Charging Database you will also be asked to sign an Access Agreement as per section 5.2.

5.2. Access Agreement

Required if you want to be a REC service but not become a REC Party.

If you are not a REC Party and do not intend to become a REC Party, you will need to sign an Access Agreement for those REC Services you are requesting access for. This should be

signed by a director or equivalent representative, as detailed within the Entry Assessment Application form, and returned to the Code Manager.

An example of the Access Agreement can be found in the REC Qualification and Maintenance Schedule.

You will not be able to access the service until this Access Agreement has been signed and returned.

5.3. Initial planning meeting

The Code Manager will contact you within 5 working days of you submitting your completed Entry Assessment Application form and your application being validated to schedule an initial planning meeting. For applicants to be REC Parties this will take place after accession, whereas for Non Party applicants, this will be when your application form has been validated.

Within this planning meeting the Code Manager and you will discuss:

- The REC Entry Assessment process as a whole, including the expectations and requirements at each stage depending on the Market Role(s) and/or REC Service(s) you have applied for.
- Your market aspirations. For example, for an Energy Supplier this would consist of numbers of Registrable Measurement Point, the rate of capture and duration and any circumstances that would have an effect on the risk posed to the market (e.g. self-supply).
- The next steps to be undertaken by yourself.
- Any other matters considered relevant by yourself and the Code Manager.

The Code Manager will determine the approach to be taken based on the information provided and the Code Manager will allocate resources and work with you to implement the approach.

Further advisory meetings may be required and requested by yourself to discuss the different REC Entry Assessment stages. These discussions may cover the preparedness that is required for each stage, the documentation that must be submitted to the Code Manager and the evidence that is required in order to demonstrate compliance with the REC requirements.

The Code Manager will not provide any consultancy services to yourself regarding the REC Entry Assessment process and all support provided by the Code Manager during the REC Entry Assessment process is to ensure that the process is clear and unambiguous only and is not to assist in the development of your business solution, processes or systems.

5.4. Entry Assessment Plan

Required for all applicants.

The Entry Assessment Plan is a document produced by the Code Manager showing how you expect to proceed through the REC Market Entry process. A draft Entry Assessment Plan based on your application will be shared with you prior to an initial planning meeting between you and the Code Manager. In the initial planning meeting, further details and considerations for the assessment stages will be discussed as well as expected timeframes.

The Entry Assessment Plan will act as a baseline and detail the relevant operational requirements and assessment requirements to support your Entry Assessment process through to qualification, however the Market Entry process will be individualised for your application.

6. Business Solution Assessment

Required if you are an Energy Supplier, DNO, MEM, or GT

If you are required to complete a Business Solution Assessment, this form will ask you to provide details and evidence of your business solution, comprising business processes, local work instructions, management procedures and IT applications.

We are looking to assess the following:

- You understand your REC obligations and have systems, processes and people in place to deliver them.
- The business solution is coherent i.e. your staff can navigate the business processes required for typical business scenarios and it is clear what functions are automated.
- The business solution is suitable to operate the volume of transactions envisaged by your organisation.
- There is a strategy and plan that covers all the requirements for:
    - Integration Testing (consisting of interface and business process testing);
    - Internal Testing; and
    - External Testing.
- There are management processes defined for the control of changes, problems and configuration as well as release management and test management.
- All required agreements have been initiated, including for example (but not limited to) bi-laterals for manual Market Messages, Supplier Agents (Suppliers only), and use of system agreements.

This also allows us to tailor the work we do to your business, removing unnecessary queries throughout the entry process wherever possible.

7. Market Scenario Testing

Having systems ready to operate in the market is key to successful operation, we therefore look for evidence these are ready. We split this into two parts: Internal Testing and External Testing.

During the Internal Testing Assessment, the scenarios are performed wholly within your own environment, with you simulating all the various interfaces with other Market Participants.

During External Testing, you will once again undertake defined market scenarios, but this time interacting with the Code Manager over the Data Transfer Network, and with the Switching Operator over the Central Switching Service, to demonstrate how your systems and processes will work.

We base the extent of External Testing required based on the results of your internal testing, particularly how thorough your testing process has been.

7.1. Internal Testing Assessment

Required if you want to be an Energy Supplier, DNO, or MEM.

If you are required to complete an Internal Testing Assessment, this will involve you running tests to demonstrate your systems and process can operate against a defined list of market scenarios.

As part of the Internal Testing Assessment you will perform testing against a set of market scenarios; the scope of the Internal Testing will be provided to you by the Code Manager as part of the conclusion of the BSA, and the full list of market scenarios is defined in the Joint BSC and REC Storyboards document which can be found on the REC Portal.

Each market scenario is a series of business events that will be encountered in live operation with you carrying out tests in relation to these scenarios using your integrated systems and processes.

They must be executed under normal operational conditions based on pre-defined data you have supplied to the Code Manager.

Evidence of the test results will be presented to the Code Manager to assess the effectiveness and coverage of this test process.

If you make any changes to your business or technical solution whilst completing testing, please notify the Entry Assessment team so we can understand if any further information or actions are required for Qualification.

7.1.1. Documentation to be Provided prior to Internal Testing Execution

You must provide the Code Manager with the following documentation, via the REC Portal, prior to the start of Internal Testing:

- The test plan showing the execution of all market scenarios including expected start, duration, and end dates.
- Test scope documentation with clear test steps assigned to testing each Market Scenario.
- Test approach document, including areas such as defect management, prioritisation criteria and logging, regression testing approach and environment plan
- A copy of the data to be used in each script.
- A complete set of the business processes and work instructions that are to be used during your Internal Testing and mapped to the relevant Market Scenarios.
- A list of organisations, sites, roles and service operators partaking in Internal Testing and what their role is.
- Details of test owners (who will be reviewing and approving testing) and test governance (where are results reported e.g. to senior management).
- Confirmation that testing will be run under ordinary operational conditions, else flagging changes to planned processes.

7.1.2. Documentation to be Provided after Internal Testing Execution

You must provide the Code Manager with the following documentation, via the REC Portal, after the completion of Internal Testing execution:

- A summary of testing completed in-line with the initial test plan
- For each scenario, evidence of the completion of each test step, such as before and after reports, screen prints, and file prints
- The defect log, noting how any defects were resolved, and any relevant run-off plans
- Any additional context from the testing results, such as any problems encountered, and any cases where testing was not run under ordinary operational conditions.

7.2. External Testing

Required if you are an Energy Supplier or DNO.

If you are required to complete External Testing, this will involve you running tests, in conjunction with the Code Manager or CSS Provider, to demonstrate your systems and processes can operate against a defined list of market scenarios.

The scope of the DTN and CSS External Testing will be decided on a case-by-case basis and dependant on your Business Solution Assessment and Internal Testing.

7.2.1. External Testing Entry Criteria

In order to commence External Testing, you must:

- Have completed the Internal Testing Assessment to the satisfaction of the Code Manager; and
- Have installed and configured a DTS Gateway.
- Have completed the Information Security and Data Protection assessment stage

The Code Manager will then provide you with access to the relevant REC Service(s) to allow for testing, but if you are not subsequently Qualified this access will be revoked.

7.2.2. DTN External Testing

The DTN External Tests are designed to demonstrate that you:

- Have configured your DTS Gateway correctly;
- Can transmit all relevant Market Messages[1], as defined in the Data Specification from each Market Message's normal point of origin to the required destination;
- Can receive all relevant, valid Market Messages from the gateway and route them to the appropriate point from which processing would normally take place; and
- Can detect invalid incoming Market Messages and route them to a holding area.

During testing you will need to send a complete set of relevant Market Messages to the Code Manager.

You are responsible for creating the Market Messages prior to the test using the mechanisms that form your business solution, and for providing evidence to the Code Manager showing the routing of the Market Messages from their point of origin to the gateway.

The Code Manager will receive the Market Messages from its own gateway and confirm that they are valid in accordance with the Data Specification and market domain data.

Additionally, the Code Manager will send you a number of files containing a complete set of Market Messages appropriate to your Market Role; the Code Manager is responsible for providing the Market Messages.

You are responsible for providing evidence that valid Market Messages are correctly routed to the normal point of entry to your systems.

[1] Relevant flows are those that are applicable to the REC Market Role. Dataflows to or from the following parties are deemed out of scope of the REC Entry Assessment; BSC Agent; Settlement Administration Agent (SAA); Supply Volume Allocation Agent (SVAA); and Market Domain Data Administrator (MDDA). Additionally, any dataflows for which there is a bi-lateral agreement with the other Market Participants to exchange them manually, are also deemed out of scope for the DTN Connectivity Testing.

Some of the Market Messages sent by the Code Manager will contain errors and are designed to assess your ability to handle exceptions. You are expected to detect these and route them in accordance with your normal business processes, including the exception management processes.

If the Party is applying to become a Electricity Supplier, DNO, or MOA, then some elements of the DTN Testing may be combined with Data Integration Platform (DIP) Testing as per Section 9.3 of this *Entry Assessment Information Pack*.

7.2.3. CSS External Testing

Central Switching Service (CSS) External Testing verifies your capability to act as a CSS user. The CSS External Testing scope will be defined by the CSS External Testing Scenarios and will be limited to proving the CSS interfaces only.

Test PKI (Public Key Infrastructure) certificates will be used during CSS Testing. You will need to obtain Test PKI certificates in accordance with the process described in the REC Central Switching Service Schedule and via the Switching Portal.

You will perform connectivity testing ahead of CSS External Testing execution to validate that the environment and test data are in place; the entry criteria is outlined in the CSS External Testing Guidance document which can be found on the REC Portal.

You will be allocated test data to support your testing which will be shared via the Test Data Tool. You will execute CSS External Testing via a supported Testing Service provided by the Switching Operator.

You will need to prove integration to the CSS in accordance with the agreed Market Scenarios and use data loaded within your own UIT Test environment. You will need to execute the Test Scripts and record the test outcomes including raising any Testing Issues in Test Management and the Test Issue Management Tool.

You will manage the test schedule and the scheduling of the execution of the CSS External Testing Test Scenarios with support from the Switching Operator

The Switching Operator will review your test evidence and confirm that all relevant test scenarios have successfully been executed and the exit criteria has been met prior to issuing a Test Completion Report to the Code Manager.

7.2.4. External Testing Outcome

If, during this assessment, the Code Manager identifies a discrepancy in the execution of a market scenario, the Code Manager will raise an issue which will be communicated to you via the REC Portal.

You must analyse the issue, determine the reason for its occurrence, and propose corrective action. The Code Manager will review this analysis and may request further clarification or evidence if necessary.

7.3. Managed Service Providers

The REC requires organisations to follow specific processes and data specifications, it does not set business models; Parties may opt to use managed service providers to provide systems and processes.

Parties are responsible for ensuring they meet the REC requirements during Market Entry and beyond, however where relevant the REC Code Manager will consider evidence from a managed service provider as relevant evidence of:

- Developing systems to meet REC process requirements
- Integrating systems with REC Services, e.g. EES, GES and CSS
- Providing internal testing that the software works as intended

However, during Market Entry, Parties will still need to demonstrate:

- Messages can be sent via the right mechanisms to test connectivity (e.g. Central Switching Service, Data Transfer Network and eventually Data Interchange Platform). This also tests that a logically separate environment exists for this new business.
- That the new staff have been trained on their responsibilities and have trialled key processes so that they know what to do.
- That a minimum level of information security risk management is in place, as would be expected for a new business.

Depending on the relationship between the Managed Service Provider and the Party, as well as the Party's operating history, the REC Code Manager may consider it appropriate to adapt the structure of the Market Entry process by completing technology testing first and business processes and information security later.

In some cases, a Managed Service Provider may begin the Market Entry process prior to identifying the eventual owner and operator of a company. As above, the REC Code Manager may consider it appropriate to complete technical testing at this point, however the REC Code Manager does not consider it appropriate to enable them to Qualify without a clear understanding who will operate the company and that they have adequate operational processes, procedures and controls.

Additionally, any businesses that completed testing under the MRA can utilise the MRA testing as evidence for their readiness, however will need to provide additional evidence of its continued relevance and applicability and that they have made suitable adjustments to follow new or changed processes such as for the Central Switching Service.

8. Information Security and Data Protection (ISDP)

Required if you are an Energy Supplier, DNO or Non Party REC Service User

If you are required to complete an ISDP Assessment, you will need to answer a series of questions and provide evidence around your ISDP arrangements on the REC Portal. Your responses and evidence will then be assessed by the Code Manager.

8.1. ISDP Assessment Objectives

The objective of ISDP Assessment is for you to provide sufficient evidence to give assurance that:

- You have adequately identified and looked to address ISDP risks that you would face if you successfully qualify; and
- You have processes defined to adequately manage those ISDP risks.

8.2. ISDP Assessment Process

To commence the ISDP Assessment, you first need to complete the ISDP form on the REC Portal. This includes submitting relevant evidence to the Code Manager.

Guidance around the questions asked, how to respond and what evidence is required is also in the Entry Assessment Forms on the REC Portal.

Please note that depending on your role and the access you are applying for, not all questions will be applicable; the REC Code Manager will provide guidance on which questions are relevant during the initial planning meeting.

8.3. ISDP Assessment Method

Your ISDP form should provide adequate coverage of all requirements under the REC, and where processes are carried out on behalf of you by a third party, additional information should be provided around their ISDP arrangements.

A copy of all relevant ISDP documentation must be made available to the Code Manager at the beginning of the ISDP Assessment. The ISDP Assessment concentrates on the existence of defined processes, whether these are documented procedures or automated processes and the Code Manager may undertake sample checking of process to assess compliance.

The Code Manager will use a risk-based approach to carry out the ISDP Assessment and confirm the responses to all ISDP questions. If, during this assessment, the Code Manager

requires further information or evidence, this will raise an issue which will be communicated to you via the REC Portal.

9. Qualification

Required if you are an Energy Supplier, Supplier, DNO, MEM, GT or Non Party REC Service User

Once you have completed all applicable stages and obtained all licences as required by the Market Role and/or REC Service you have requested you will become Qualified under the REC and the Code Manager will notify you of this status.

9.1. Qualification Completion

The Code Manager will either issue you the necessary user credentials for the applicable systems, or request the relevant body provide you with these.

The REC PAB, the Authority, the CDSP, and BSCCo will be informed of decision by the Code Manager as necessary.

You may qualify subject to having Controlled Market Entry Conditions as detailed in section 10.

9.2. Withdrawing Application

Applicants will only Qualify if they provide suitable evidence that they can operate as required under the REC. The Code Manager may request further evidence, or require changes to be made before qualification. You can do this by responding to communication in the REC Portal.

You may wish to end your application if you are unable to provide this evidence, or to end the process and appeal a decision. Where the work required to meet the required standard is extensive we will discuss this with you to agree a way forward, which could involve starting a fresh application.

9.3. Marketwide Half Hourly Settlement (MHHS)

Electricity New Entrants prior to MHHS Milestone M14

The Market-wide Half-Hourly Settlement (MHHS) Programme introduced a new Target Operating Model into the Electricity industry, resulting in significant code changes to both the REC and the Balancing and Settlement Code (BSC). Consequently, the REC and BSC together designed the MHHS Qualification approach as a joint assurance process to review whether Parties are ready to operate with the updated MHHS business processes.

Two of the key documents developed to facilitate MHHS Qualification were the Qualification Assessment Document (QAD), and a list of Qualification Test Cases (QTCs).

Given the significant overlap between the QAD and the existing elements of the REC Entry Assessment process, the REC will not require that New Entrants complete a QAD when entering the Market and only operating with MHHS MPANs. However, if a Party Qualifies to operate with Legacy MPANs, then subsequently completes MHHS Qualification, they will be required to complete the QAD as part of that MHHS Qualification.

Therefore, Electricity Suppliers, DNOs, and MOAs that wish to Qualify prior to MHHS Milestone M14 will therefore need to complete the following steps to Qualify under the REC:

	Supplier/MOA Qualified with Legacy MPANs then starting MHHS Qualification	DNO, plus Supplier/MOA only operating with MHHS MPANs
REC BSA	✓	✓
REC Market Scenario Testing (Internal/External)	✓	Reduced Scope*
REC ISDP	✓	✓
REC Pre-Requisites	✓	✓
Controlled Market Entry (if applicable)	✓	✓
MHHS Programme QAD	✓	
MHHS Programme Testing	✓	✓

applicants are only required to complete **MST on areas not covered during MHHS Programme Testing, which also includes **CSS External Testing** for DNOs and Suppliers.*

Electricity New Entrants after MHHS Milestone M14

The REC Code Manager intends to keep operate the same structure to Market Entry assurance as outlined in Section 2.2 and 3.1 of this *Entry Assessment Information Pack*.

The QTCs used during MHHS Qualification do not cover all of the business processes that are currently part of REC Market Scenario Testing, but that will continue to be relevant after the MHHS transition.

We therefore will work with BSC to update the QTCs to include the full set of REC DTN and DIP testing requirements for Electricity Suppliers, DNOs, and MOAs. We will additionally update the existing REC and BSC Joint Storyboards to refer out to the QTCs for those roles, and provide additional guidance for other roles e.g. Gas Suppliers and Safe Isolation Providers.

The External Testing that Parties complete with these QTCs will fulfil the DTN External Testing and DIP External Testing requirements as outlined in the Qualification and Maintenance Schedule; CSS External Testing will continue to be operated separately by the CRS Provider.

The REC Code Manager intends to continue to allow Parties to place reliance on previous External Testing, though not Internal Testing, in-line with the current REC Market Entry processes. At the time of publication, BSC have not confirmed whether they will allow Parties to place reliance on previous testing. This could lead to a situation where a Party is required by the REC to complete Internal Testing, and by the BSC to complete the equivalent of External Testing. We recognise this would create an additional, duplicative testing burden for Parties; in such cases, we would work with the Party to uplift the External Testing they are completing with BSC to additionally include the Internal Testing requirements they need to complete for the REC so they are only required to complete one set of testing.

Further MHHS Considerations

The existing Qualification steps for Gas Suppliers, Gas Transporters, and MAMs as outlined in this *REC Entry Assessment Information Pack* are not impacted by the above MHHS changes. Electricity Suppliers and DNOs will additionally need to complete Qualification under the BSC, who may require the Party to complete other documentation such as the Self-Qualification Assessment Document (SQAD) as outlined on the MHHS Programme website.

After the QTCs have been updated, and the REC and BSC have finalised how the External Testing will operate, this *Entry Assessment Information Pack* will be updated to capture more detail on the enduring Testing solution as well as the interaction between REC, Elexon, and the applicant.

~~MHHS is a significant change to the Electricity Market which will impact how Electricity Suppliers, DNOs, and MOAs interact with each other and the wider industry. The changes brought about by MHHS will result in code changes to the REC, which will be implemented at MHHS Milestone M8. The industry will begin to migrate to the new arrangements at M11/M12 and all existing Suppliers must be Qualified by M14. The planned dates for these milestones can be found on the MHHS Programme website.~~

	Market Entry Date		
	Before M11/12	M11/12 to M14	After M14
REC BSA	✓	✓	✓
REC Market Scenario Testing (Legacy Arrangements)	✓	DNO ✓ Supplier - Choice MOA - Choice	
REC Market Scenario Testing (MHHS Arrangements)		✓ Significantly Reduced Scope	✓
MHHS Programme Qualification	✓	✓	
DIP Manager Testing			✓ Arrangements TBC

New Entrant – During MHHS Programme

New Electricity Suppliers, DNOs, and MOAs who wish to operate prior to M14 will be required to complete the REC Qualification process as outlined earlier in this document and will also be required to complete Qualification with the MHHS Programme. The requirements for MHHS Qualification are outlined in the MHHS Qualification Approach & Plan on the MHHS Programme website.

After M11/12, a Supplier may choose whether Electricity RMPs that are initially registered or gained in a switch will operate under MHHS arrangements. Therefore Suppliers and MOA entering the market after M11/12 and before M14 may choose whether they wish to Qualify and operate only under MHHS arrangements. In these cases, any non-MHHS scenarios will be de-scoped from the Market Scenario Testing. The scope for Market Scenario Testing will be further reduced based on testing conducted during MHHS Qualification, however the REC Code Manager may require the entrant to complete a small number of Market Scenario Tests which are not wholly covered by the MHHS Programme Qualification.

As DNOs cannot control whether Suppliers operate the Electricity RMPs on their network under the MHHS or legacy arrangements before M14, DNOs who wish to enter the market prior to M14 must be Qualified to operate with both legacy and MHHS arrangements.

New Entrant – After MHHS Programme

New Electricity Suppliers, DNOs, and MOAs who wish to operate after M14 will not be required to complete MHHS Qualification through the MHHS Programme. The REC Market Entry process will be the same as outlined in this document, however for Market Scenario Testing new entrants will only be required to complete testing around MHHS arrangements.

The REC Code Manager will continue to coordinate the required DTN and CSS Market Scenario Testing for a Party to become Qualified under the REC. However, the Data

~~Integration Platform (DIP) Manager may define separate testing to become a Qualified DIP user, which will be a pre-requisite for REC Qualification.~~

10. Controlled Market Entry (CME)

May apply to any Qualified Party

You may become Qualified subject to certain conditions and restrictions.

These conditions and restrictions are in place to prove your systems and processes in the live market and the Code Manager will notify you of these at the same time as you are informed of becoming Qualified.

When you believe you have met the parameters for these conditions and restrictions to be lifted you can complete the Controlled Market Entry Self-Assessment to request your exit from Controlled Market Entry. This Self-Assessment will be assessed by the Code Manager.

10.1. Controlled Market Entry

There is no specific form to propose CME conditions since the REC Code Manager will agree conditions on a case-by-case basis, however typical conditions include areas such as:

- Maximum Registration Cap (i.e. total registrations)
- Maximum Registration Rate (i.e. registrations per month)
- Criteria to initiate CME exit (time-based and/or number of registrations)
- When the Party will begin operations
- When Party is required to notify Code Manager (e.g. after first registration)

When you initially propose CME conditions, please include supporting context and rationale considering areas such as:

- Business plan and expected number of registrations
- Relevant operational experience
- Use of business systems and processes
- Market Role(s) / Sector(s) (e.g. HH or NHH)

Additionally, there is no set time for CME conditions to be applied, but generally the minimum length of time is 6 months to allow the REC Code Manager to monitor your performance as you operate in the market.

You can upload your CME proposal to the REC Portal, and the Code Manager will review your proposed conditions alongside other information provided as part of the Entry Assessment process. The Code Manager may arrange a meeting to discuss the proposed CME conditions and suggest an adjustment before approving.

10.2. CME Exit

When you believe you have met the completion criteria for CME, you should contact the Code Manager using the REC Portal.

You will be asked to complete the Controlled Market Entry Self-Assessment Form on the REC Portal to self-certify that you have successfully proved your operational capability. This self-certification will require authorisation from a Director (or equivalent representative).

Guidance around the questions asked, how to respond and what evidence is required is also in the Entry Assessment Forms document here.

The Code Manager will review your Controlled Market Entry Self-Assessment Form and seek evidence that you can operate in accordance with the REC requirements. This will typically focus on your performance in the market to date.

Once completed, the Code Manager will advise you of its conclusions, prior to sharing these with the PAB.

11. Appeals

11.1. Appeals Process

You can appeal the decisions of the Code Manager. Before doing so it is important that you engage with the Code Manager to clarify any requests that have been made of you, or issues that have been identified. You may be able to resolve the query, for example by submitting different evidence or explanations. Examples of things that you might appeal are:

1. Findings of the Code Manager that prevent you completing a phase of the Entry Assessment process.
2. Proposed Controlled Market Entry Conditions that would apply once Qualified.

If you wish to appeal a decision you can exit the Entry Assessment process to do so. You will then need to raise an appeal through the REC Portal within 10 Working Days of exiting the process. After your appeal you will be able to re-join the Entry Assessment process in the same position you were previously in, except for changes as a result of the appeal.

Full details of the appeals process are available on the REC Portal here, and you will be provided with these should you initiate an appeal. There are also details specific to entry included in the REC Qualification and Maintenance Schedule.

Appeals are made to the PAB, and organisations appealing can provide relevant evidence and present to the meeting where the appeal is heard.

The PAB can determine if the original decision should be upheld or overturned, and the Code Manager will make you aware of the decision. There are provisions for the PAB to escalate appeals to the RECCo Board, if it is unable to make a determination.

If you are dissatisfied with the PAB, or RECCo Board's determination, you may make a final appeal to Ofgem under the REC Disputes procedure. If your appeal is not upheld you will be provided with details of this procedure, as well as the timeframe for you to dispute the decision. Ofgem's determination shall then be final and binding for the purposes of the Code.