RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0348 – ENERGY CODE REFORM - CONSEQUENTIAL CHANGES TO THE REC

On 09 October 2026 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0348.

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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DATE ISSUED	09 November 2026
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Holly Law

DATE CONSULTATION ISSUED	09 October 2026
RESPONSE DEADLINE	30 October 2026

Question 1:	Do you consider that the proposed R0348 amendments accurately and completely reflect the changes required as a consequence of Energy Code Reform, including the removal or replacement of legacy governance arrangements, roles, terminology and processes? If not, please identify any amendments you consider are missing or incorrect.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We agree that the proposed amendments reflect the changes required as a result of Energy Code Reform.	Thank you for your response.
Northern Gas Networks (Gas Transporter)	Northern Gas Networks (NGN) considers that the proposed amendments broadly reflect the consequential changes required to support Energy Code Reform. NGN notes that, to avoid potential conflict between this consultation and Ofgem's statutory consultation on modifications to the Retail Energy Code and affected licences, the two drafting packages should be reconciled before implementation. We would welcome confirmation that this reconciliation will prevent any omission, duplication or conflict.	The Code Manager can confirm that the drafting from R0348 and Ofgem's statutory consultations on modifications to the Retail Energy Code and affected licences, will be reconciled before implementation. Where a REC Schedule is being amended both by Ofgem and by R0348, the two sets of amendments will need to be read together and, on implementation, consolidated to form the complete revised Schedule.
SSE Energy Supply Limited (Energy Supplier)	From our review of the red line changes, we cannot say whether amendments accurately and completely reflect the changes required, but we have no issue with the changes as recorded.	Thank you for your response.
Smart DCC Ltd (Data Communications Company)	No. As per our response to the Ofgem Energy Code Reform statutory consultation on modifications to the REC and affected licences, DCC disagrees with the proposals to replace the term 'Code Manager' with	Thank you for your response. We note DCC's view that the terms 'Code Manager' and

	'RECCo', and the term 'REC Board' with 'RECCo Board' throughout the REC. DCC considers that the terms 'Code Manager' and 'Code Manager Board' respectively would be more appropriate terms to describe these two entities within the REC under the new arrangements. DCC considers that 'Code Manager' is a clearer, unambiguous term for the role which links back to the Code Manager licence and would provide consistency across all the codes through using the same term. It would also align to the general approach for regulatory text to refer to entities in a role-based, organisation-agnostic manner, as we consider the term 'RECCo' could be interpreted as the organisation that would be fulfilling this role. This would therefore also better futureproof the code for scenarios such as a new Code Manager being appointed at a later date. DCC's view that the term 'Code Manager Board' should be used in place of 'REC Board' is consequential to the above reasons.	'Code Manager Board' should be used in place of 'RECCo' and 'RECCo Board'. The terms 'RECCo' and 'RECCo Board' come from the legal text Ofgem proposed in its Energy Code Reform statutory consultation on modifications to the REC and affected licences, published on 04 September 2026. These changes are outside the scope of R0348. R0348 only makes the consequential amendments, and it uses the same terminology as Ofgem's proposed legal text so that the REC reads consistently once both sets of changes are implemented. Should Ofgem's final legal text use different terminology, we will reflect that in any later consequential changes to the REC.
SP Energy Networks (Distribution Network Operator)	SPEN have identified no issues in the proposed changes in relation to this consequential change.	Thank you for your response.

Question 2:	Do any of the proposed R0348 amendments have an unintended operational, technical or contractual impact, including where an existing REC role, term or governance reference may be relied upon in systems, service arrangements or operational processes? If so, please provide details	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No, not that we have identified.	Thank you for your response.
Northern Gas Networks (Gas Transporter)	NGN has not identified any substantive operational, technical or contractual impact for Gas Transporters. However, where amendments relate to CDSP services, we consider that the existing distinction between CDSP functions undertaken under the UNC and services provided for REC purposes should remain unchanged. Therefore, we would welcome confirmation that R0348 does not alter this existing boundary.	The Code Manager can confirm that R0348 makes no changes to the existing distinction between the CDSP functions undertaken under the UNC and services provided for REC purposes.
SSE Energy Supply Limited (Energy Supplier)	At this stage we do not foresee these changes having any unintended impacts.	Thank you for your response.
Smart DCC Ltd (Data Communications Company)	Please see our response to Question 1.	Please see our response to question 1.
SP Energy Networks (Distribution Network Operator)	We have identified no additional impact in relation to this change.	Thank you for your response.

Question 3:	Do you agree that the additional housekeeping amendments included within R0348 are appropriate and do not introduce any substantive change to existing REC obligations or arrangements? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We agree that the housekeeping amendments included are appropriate and do not appear to change any existing REC obligations or arrangements.	Thank you for your response.
Northern Gas Networks (Gas Transporter)	NGN agrees that the proposed housekeeping amendments are appropriate and has not identified any substantive change to existing REC obligations or arrangements.	Thank you for your response.
SSE Energy Supply Limited (Energy Supplier)	Yes.	Thank you.
Smart DCC Ltd (Data Communications Company)	Please see our response to Question 1.	Please see our response to question1.
SP Energy Networks (Distribution Network Operator	We are supportive of the housekeeping amendments	Thank you for your response.

Question 4:	Do you have any other comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	N/A	N/A
Northern Gas Networks (Gas Transporter)	NGN's principal comment concerns the interaction between the R0348 legal text and the amendments arising from Ofgem's statutory consultation on modifications to the Retail Energy Code and affected licences. NGN considers that the two drafting packages should be fully reconciled before implementation, particularly where they amend the same provision or the Ofgem drafting contains amendments not reflected in R0348. We would welcome confirmation that the final REC baseline will incorporate both sets of amendments without omission, duplication or conflict.	Please see our response to question 1.
SSE Energy Supply Limited (Energy Supplier)	No.	Thank you.
Smart DCC Ltd (Data Communications Company)	No.	Thank you.
SP Energy Networks (Distribution Network Operator)	No further comments.	Thank you.

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)	N/A	N/A
Northern Gas Networks (Gas Transporter)	NGN supports R0348 as a necessary consequential change to support implementation of the Energy Code Reform arrangements. Consistent with our response to Ofgem, the final arrangements should maintain clear Code Manager accountability, transparent governance and a clear allocation of responsibilities. Subject to the drafting reconciliation identified in Question 4, NGN supports implementation of R0348.	Thank you for your response.
SSE Energy Supply Limited (Energy Supplier)	No.	Thank you.
Smart DCC Ltd (Data Communications Company)	No.	Thank you.

SP Energy Networks (Distribution Network Operator)	No further comments.	Thank you.