

30th July 2021

Rachel Clark
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

By email only to switchingprogramme@ofgem.gov.uk

Consultation Response: Switching Programme Significant Code Review: Retail Energy Code v3.0

We appreciate the intent of this consultation. Early sight of the proposed new Retail Energy Code (REC) schedules, that will be introduced when the new Faster Switching arrangements start, is useful in ensuring that we will be ready from an operational perspective.

Understanding of the governance arrangements are critical to ensuring that our business processes and local work instructions are updated and remain compliant for the new faster switching arrangements.

A better understanding of how the ERDS and CSS will operate on a practical basis is needed. This will allow a more accurate service definition to be drafted, tailored to the actual requirements of the service.

Yours sincerely

Alex Travell
Head of Regulation

Responses to specific consultation questions:

Question 1: Do you agree that access to data within the GES should be governed under the provisions of the REC?

Yes, having all governance of industry data within one location is logical. It makes engagement by industry parties easier and ensures that change can be co-ordinated in a more efficient way and with greater resilience. The likelihood of misalignment should be reduced.

Good cross-code working between the REC and UNC will be required to make the proposed arrangements operate successfully.

Cross code working by the UNC is an area that has required improvement for many years and this initiative may therefore have broader benefits in delivering behavioural change.

Question 2: Do you agree that suppliers should be required to de-activate a registration following termination of an RMP within 10 working days? If not, what would be an appropriate timeline?

Yes, this seems a reasonable timescale.

Service Definitions comments

Our specific comments on the service specifications are included in the attached appendix to this letter.