

Rachel Clark
Ofgem
10 South Colonnade
Canary Wharf
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E14 4PU

30th July 2021

Sent by email only to: switchingprogramme@ofgem.gov.uk

Dear Rachel,

Retail Energy Code Version 3.0 Consultation

Thank you for the opportunity to respond to the above consultation. This is a non-confidential response on behalf of the Centrica Group, excluding Centrica Storage and NEAS Energy.

We continue to support the development and implementation of the new faster and more reliable switching arrangements via the Switching Programme, and Retail Code Consolidation into the Retail Energy Code. We welcome the detail provided within this consultation and associated subsidiary documents.

Overall and having reviewed and commented upon these schedules as they have been developed through prior consultation and programme governance, we are comfortable that the schedules as drafted reflect the agreed design of the switching programme. Where we have additional detailed comments on the drafting of the schedules, we have included those within the comments sheet attached to this letter (by email).

Please find below in Appendix A, our responses to the two specific questions posed within the consultation itself.

We would be happy to discuss our response and thoughts with you in more detail. Should you have any immediate questions please contact me.

Yours faithfully,

Adam Iles
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Centrica, Legal & Regulatory Affairs, UK & Ireland
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APPENDIX A

Question 2.1: Do you agree that access to data within the GES should be governed under the provisions of the REC?

Given the criticality of the GES to the switching and other retail processes governed under the REC, and for the purposes of consistency with governance of the EES, we agree that access to the data with the GES should be governed under the REC.

Question 2.2: 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?

We agree that to support alignment of data, that registration de-activation or terminated MPANs is a sensible and necessary action. However, we are conscious that MPANs are occasionally disconnected in error and that therefore, once a supplier has taken the step of de-activating the registration, that it is not possible for the status of the RMP to be reverted to Operational. To resolve such erroneous disconnections where registration de-activation has already taken place, suppliers would then need to create a new MPAN /RMP, in addition to new customer accounts etc. A longer SLA, would potentially limit the number of new RMPs that would need to be created in this scenario, whilst still ultimately requiring suppliers to de-activate registrations for RMPs that have been genuinely terminated.