



REC v3.0 Consultation DCC Response

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Rachel Clark

Switching Programme
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

By email to: switchingprogramme@ofgem.gov.uk

30 July 2021

Dear Rachel,

DCC welcomes the opportunity to respond to Ofgem's consultation on the Retail Energy Code (REC) – proposals for version 3.0.

As requested, we have provided comments against the consultation schedules in the template provided. We have added our comments on the SEC consequential changes consultation to the template.

We have worked closely with RECCo and Ofgem to develop the schedules and agree that they are an accurate reflection of the switching design with some exceptions. We have responded with suggested changes for closer alignment to the design. We would welcome further engagement with Ofgem and RECCo to discuss our comments.

With respect to the REC Address Management Schedule and in particular the obligations on different parties for improving REL Match Rates, we are concerned that responsibilities in the REC are not fully defined. We would ask Ofgem to consider introducing obligations for Gas Transporters and DNOs to provide high quality MPL Addresses to the CSS. This can deliver the benefit of improving REL Match Rates as it will ensure the source address provided closely matches the content of the Address Gazetteer being used. Furthermore, this approach will help to ensure accountability for address quality within the REC is shared equally across the parties who have a role in improving REL Match Rates, as the CSS's ability to achieve high rates is directly dependent on receiving source data of a high standard.

We have provided suggestions for potential obligations for source data providers in our response and would welcome further discussion with Ofgem on this.

Although a new version of the REC Main Body has not been issued for review as part of the consultation, we have reviewed the version designated for REC v1.1 and have suggested a number of changes to be incorporated in the v3 Main Body update. In particular, we would welcome discussion with Ofgem and RECCo on the Main Body's Intellectual Property Rights (IPR) and Liability provisions, as well as the Switching Service Management Schedule and the Change Advisory Board Terms of Reference.

If you have any questions relating to our response, please do not hesitate to contact Cordelia Grey (Cordelia.Grey2@smartdcc.co.uk) in the first instance, or me.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Siobhan Stanger', with a stylized, cursive script.

Siobhan Stanger
Chief Regulatory Officer