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30 July 2021

Dear Rachel

**Switching Programme Significant Code Review: Retail Energy Code v3.0 and consequential changes to industry codes**

EDF is the UK's largest producer of low carbon electricity. We operate low carbon nuclear power stations and are building the first of a new generation of nuclear plants. We also have a large and growing portfolio of renewable generation, including onshore and offshore wind and solar generation, as well as energy storage. We have around five million electricity and gas customer accounts, including residential and business users.

EDF aims to help Britain achieve net zero by building a smarter energy future that will support delivery of net zero carbon emissions, including through digital innovations and new customer offerings that encourage the transition to low carbon electric transport and heating.

We welcome the consultation and publication of the proposed content of v3.0 of the Retail Energy Code (REC) and the consequential changes to industry codes. Early sight of the legal text that suppliers will need to adhere to when faster switching goes live is very useful and will support suppliers and other parties in implementing the changes required as part of the Switching Significant Code Review (SCR). It is reassuring that the feedback we have on the REC content and code changes is minimal, indicating that the legal text broadly reflects the technical design that we have been working to.

However, clarity is required on the next steps following this consultation, and specifically when parties will be able to see any updated drafting. We would like to see any changes to the drafting as soon as possible, and preferably ahead of the Significant Code Review (SCR) modification proposals being published in December. The design of our systems and processes is intrinsically linked to the legal text of the REC and other codes – we will be working to the drafts issued in this consultation until we see any updated text. We need to understand any changes as early as possible in order to conduct impact assessments and implement any consequential changes prior to go live.

Following the recent consultation on the content of REC v2.0 there were few updates provided on changes that would be made until the decision document was published at the end of April. Many

changes were not made visible until Switching Programme Change Request CR-D092 was published. This created uncertainty about what exactly would be in the REC, creating a barrier to effective planning for REC v2.0 implementation. Earlier publication of updated documents following this consultation on REC v3.0 and consequential changes will support in ensuring supplier readiness.

Our detailed responses are set out in the attachments to this letter. Should you wish to discuss any of the issues raised in our response or have any queries, please contact Paul Saker, or myself.

I confirm that this letter and its attachment may be published on Ofgem's website.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Denise Willis', with a stylized flourish at the end.

**Denise Willis**  
**Senior Manager of Industry Change**

## Attachment 1

### Switching Programme Significant Code Review: Retail Energy Code v3.0

#### EDF's response to your questions

#### **Q2.1. Do you agree that access to data within the GES should be governed under the provisions of the REC??**

Yes. We agree that it is a good practice to govern both Enquiry Services under a single industry code.

There are three main benefits of introducing the Gas Enquiry Service (GES) into REC v3.0:

- **Enquiry Services and consumer impact:**

The existing processes for governance of the Electricity Enquiry Service (EES) and the GES are currently under two separate industry codes. While this approach may have been appropriate for the single fuel governance under the Master Registration Agreement (MRA) and the Data Service Contract (DSC)/ Supply Point Administration Agreement (SPAA), it is no longer so under the REC which seeks to improve the experience of the energy market for dual fuel consumers.

Both of the Enquiry Services play a key role in a customer's onboarding journey and have a direct impact on the customer's experience. The main principle of the REC is to ensure gas and electricity processes are simplified, streamlined and harmonised to support and enable the provision of positive customer experience for both fuels.

To provide the right customer experience, we agree that both the GES and EES should be governed under the REC.

- **Enquiry Services and change management:**

Having both Enquiry Services governed under the REC will facilitate alignment of the services and benefit the consumer experience.

Currently, if a dual fuel data item is introduced to both Enquiry Services it is processed via separate change processes for each industry code. This can result in changes being delivered at different times, to different specifications, inhibiting suppliers from providing dual fuel customers with the right customer experience. Having both Enquiry Services under the REC enables greater control and agility in the management of change. A cohesive approach can be taken to change management and its subsequent implementation and governance if both Enquiry Services are managed under the REC.

- **Enquiry Services and design:**

Following the implementation of Faster Switching, suppliers and their third-party sales partners will be required to utilise the Enquiry Services to confirm metering point details at the point of

sale. The Retail Energy Location (REL) is one of the key aspects introduced under Faster Switching which both of the Enquiry Services are required to provide to suppliers and their sales partners at the point of sale.

The current design of the search functions in these Enquiry Services is misaligned which increases the likelihood of adverse switching scenarios and thus poor customer outcomes. For example, in its current separate state the chance of varying outputs for the same customer is higher than if they were maintained under the single umbrella of the REC. While industry is currently reviewing the solution approach for the REL to mitigate this risk, maintaining these Enquiry Services under the REC will enable efficient resolution and further alignment of these services. This will support the reduction of erroneous switches.

**Q2.2. 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?**

No, we do not agree.

Registration de-activation is a new process which will be introduced as part of REC 3.0. Setting a timescale for triggering this process before it is embedded will set this industry process up for failure and could have impact on suppliers and their customers.

Our main concern is that registration de-activation is an irreversible process which, if enacted incorrectly, can result in customer detriment where the customer's registration ceases to exist. The main risk is that this process is dependent on the Distributor or the Gas Transporter sending the original RMP termination update correctly. On several occasions we have experienced receiving incorrect notification of disconnections which we have had to rectify and request cancellation of disconnection by notifying the Distributor or the Gas Transporter.

If suppliers are required to de-activate a registration within 10 working days following termination of an RMP, this does not provide sufficient time to be able to identify any incorrect disconnections and take any rectification action to avoid a poor customer experience. Often these situations are only identified as part of a customer's routine billing cycle, meaning it could be months before such a situation is identified in some cases. If suppliers are required to de-activate a registration with no process to reverse that de-activation, this will have a direct impact on customer billing, and on settlement. Without evidence that Distributor and Gas Transporters will improve the accuracy of their disconnection processes, it is not acceptable for suppliers to be required de-activate a registration within 10 working days.

We recommend that no timescale for de-registration is specified at go-live, and that a review of the process post-implementation is conducted to establish the appropriate time for initiation of this process. This review should occur six months after go-live. Reviewing this process post implementation will allow industry to gather critical data points to determine an evidence based

appropriate timeframe for initiating the re-registration process and ensuring customer impact is minimised.

**Attachment 2**

Separate spreadsheets containing detailed comments on the REC schedules and consequential industry code change accompany this response.

**EDF**  
**July 2021**