



Independent Networks
Association

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

30th July 2021

Consultation for the Retail Energy Code – proposals for version 3

By e-mail only

Dear Rachel,

I am writing on behalf of the Independent Networks Association (INA). The INA represents and consists of the UK's leading independent utility network owners and operators who serve the domestic and commercial and industrial sectors across the UK.

Thank you for the opportunity to respond to this consultation detailing proposals for version 3.0 of the Retail Energy Code (REC). All our members continue to be fully supportive of the initiative to rationalise the industry codes into the REC and appreciate the benefits this offers to all parties and industry stakeholders.

Following a review of all the proposed schedules published within REC v3.0, no significant concerns have been raised by INA members. We attach the outcome of the review completed of each schedule which highlights some minor amendments, asks relevant questions and indicates where there may be potential issues to consider.

We would like to take this opportunity to raise some current concerns relating to the impending transition to REC v2.0 due on 1st September 2021. Following the initial consultation and expectations that had been set that there would be no significant changes as a result of transition to REC v2.0 regarding either code obligations or the level of service delivered, the following concerns have been raised by INA members and we would appreciate your support in reviewing these:

- It has recently come to light that where members are currently in receipt of bespoke services i.e. reporting, relating to industry codes such as the MRA, details of any such services have not entirely transitioned from Genserv and therefore where this is now becoming known it is unclear whether these services can continue post transition;
- It is understood that requests are being made to industry codes for information that the REC would be better placed seeking directly from IDNO parties;
- There is a lack of clarity across the community in regard to any requirements to ensure all existing IDNO parties are acceded to the REC and disappointing that IDNO members are now compelled to proactively seek confirmation rather than this being shared with them given the clear deadlines suggesting that any existing party that fails to accede to the REC by a certain date would be expected to repeat Market Assurance activities.



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Our members are keen to engage with the REC to ensure that the transition of the REC into the standard industry code framework is smooth and efficient and would welcome any thoughts as to how best to do this given the short timescales now available before REC v2.0 goes live.

Yours sincerely,

VBell.

Vicky Bell

Chair to the Independent Networks Association Regulations Sub-Committee

Encl.