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*Sent by e-mail*

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**Dear Rachel,**

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

SSE Energy Supply Ltd (SSE Energy Solutions) welcome the opportunity to respond to the REC V3 consultation. We appreciate there are a number of change requests within industry at present which reduces the ability to provide a valuable response to the proposed schedules based on the information currently available and where further changes may be required to the drafting. However, we have provided feedback on the schedules where we consider we can add value.

There are some schedules where there has not been a clear update provided, such as the interpretations schedule, which will require a side by side view of the previous uplift as the tracked changes noted within the main consultation are not visible. We have also identified some incorrect numbering sequences however we are aware that, as noted in the main consultation document, a review will be completed to resolve these issues, we have therefore not detailed these in our response.

Finally, there is a reliance on Ofgem's decision for some schedules which affect our build requirements, such as the Registration services schedule. Where market participants are dependent on the approval of such schedules, these decisions should be expedited to allow as much time as possible between now and go-live.

Yours sincerely,

**Victoria Burkett**  
Regulation Manager

**SSE plc**

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## Annex 1

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

We believe access to the data within the GES should be governed under the REC however, any changes to a Shippers' obligations should remain with UNC and wording to that effect should be noted within the REC to ensure changes cannot be imposed over and above REC's remit.

### **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 believe this is a sensible timeframe to de-activate a registration where the disconnection notification is expected and should be used to raise the deactivation request or dispute the request where the supplier believes the request is invalid. There are circumstances where an incorrect disconnection will be investigated months after the event has occurred and therefore, we do not believe this is an appropriate timescale for these instances. We have not identified within the RMP schedule a dispute process where the supplier believes the disconnection has been raised in error by the DNO. The current MAP04 process details a process for retrospective manual amendments, where it has been identified that an error has occurred, we therefore believe the RMP schedule should also detail such process.

<b>REC Interpretations Schedule</b>	
General Comment	The interpretation schedule issued for consultation did not have tracked changes as stated in the main consultation document.
Working Day	The definition of Working Day needs to be reviewed, as raised at RDUG on 27 May, the wording contained within this schedule does not reflect the wording within the Supply Licence Conditions. We believe the current wording can be open to misinterpretation.
Clause 2.5 a	We do not believe a supplier should be responsible for other market participants where we do not have a contractual obligation in place with that participant. We may be aware of who the other participant is, but we will have no control over their actions without such contract. Therefore it would be sensible to include a corresponding obligation to be placed on those other parties to ensure they comply with any reasonable instruction from a supplier.

<b>REC Address Management Schedule</b>	
Clause 3.1	<p><i>'Where the Registered Supplier for an RMP holds information that indicates that the accuracy of the REL Address for the RMP could be improved, then the Registered Supplier shall promptly submit a Manually Entered Address request to the CSS Provider'</i></p> <p>We do not believe that where the accuracy of the data is poor, it can necessarily be improved in every case.. This specific clause can be open to interpretation and therefore our recommendation would be to amend the current drafting to –</p> <p><i>'the accuracy of the REL Address for the RMP could <u>reasonably be improved</u>'</i> The latest matching rate for commercial supplies is much lower than domestic sites where the address of the meter doesn't necessarily match the postal address. We could update the meter address to match the REL data which will improve the accuracy score; however, this would cause issues where we need to locate the meter at a future date.</p>
<b>REC Registration Services Schedule</b>	
Clause 2.2	Due to the changes agreed at RDUG in respect of this clause, we do not have any concerns regarding the amended drafting.
Clause 10	We believe a disputes process should be implemented for an Annulment where the gaining supplier believes the losing supplier has submitted an Annulment incorrectly and the supply should be transferred.
Clause 16	The current process details that the existing supplier can change the DPI where they are aware of the incorrect flag and only that supplier can update the DPI. However, there does not appear to be a process where, upon receiving a switch request, and the gaining supplier identifies that the DPI is incorrect, how this can be updated without affecting switching timescales. It is not clear whether the gaining supplier will need to comply with the appropriate switching timeframe, where they are reliant on the current supplier updating the DPI or whether the switch can take place based on the gaining suppliers contract. For example, where the gaining supplier identifies that the switching customer is non-domestic, but the DPI has been set, will the gaining supplier be compliant with this obligation if they switch within the non-domestic timescale.

<b>REC Related Metering Points Schedule</b>	
Clauses 1.2 (a) (ii) & 1.2 (b) (ii)	We believe the current drafting should be made explicit in that the REL and MPL must not have any identified differences such as between SAF and PAF. The current wording could lead to misinterpretation unless the same address can have identified differences, but the supplier has confirmed that this is in fact the same address. For example, currently under Gas obligations, the PAF will be used to determine the address, whereas Electricity uses SAF, if it is proposed under REC that one address format should be used, this should be clearly defined.
<b>REC Switching Service Management Schedule</b>	
Clause 1.2	Should this refer to the Switching Data Management Schedule?
Clause 1.4	<p>The REC Portal will be available for public use; however, can a supplier direct a customer and/or TPI to the portal where information they require can be obtained? Or will it be the responsibility of the supplier to relay the information. We believe there should be the ability to direct consumers and TPI's to knowledge articles specific for their roles. The current drafting appears as though the knowledge articles will be available for Market Participants and Switching Data Service providers only.</p> <p>Will there be a limitation on the number of user accounts for an organisation for the Portal? We believe there should be no limit on access to the Portal unless it is proposed that the current ECOES structure will be implemented, for example an MAU who manages access for their portfolio.</p> <p>What is the expectation of use for a market participant? We have been unable to identify whether Ofgem have a view on the expected use.</p>