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31 July 2018

Switching Programme: Proposed modifications to regulation and governance

EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables, storage, and energy supply to end users. We have over five million electricity and gas customer accounts in the UK, including residential and business users.

EDF Energy welcomes the opportunity to respond to Ofgem's consultation on '*Switching Programme: Proposed modifications to regulation and governance*'. Overall, we support the policy intent outlined in the consultation, relating to the introduction and management of the Retail Energy Code (REC). However, we have some concerns regarding the introduction of a general duty to co-operate on all licence holders.

We are supportive in principle of the proposal to insert a high level duty, via licence condition, on relevant licensees to cooperate, where appropriate, in delivering the outcome of the Significant Code Review in respect of the Switching Programme. However, it is not appropriate for Ofgem to use the Switching Programme, which has a defined scope, to widen this high-level duty and apply it to all licence holders of any type with respect to any future 'Significant Code Project'. Therefore, Ofgem should draft the duty with a specific focus on achieving the key deliverables of the Switching Programme.

EDF Energy considers that the introduction of this overarching requirement, applicable on such a broad scale, is not in line with Ofgem's statutory obligations. The level of resource and financial burden this could place on suppliers, without any recourse, is not appropriate, or proportionate to the potential level of detriment. The requirement needs to be considered on a case by case basis to ensure the level of intervention is more targeted than currently drafted.

The duty should only be used in circumstances where the success of any project is dependent on all parties being ready to implement. Ofgem must resist applying the duty to larger numbers of industry changes than required, where such industry wide co-operation is not critical. Therefore, the draft Duty to Cooperate should be amended to include a requirement on Ofgem to consult in advance of taking any decision to apply the duty to a particular 'Significant Code Project'. If, following consultation, the duty is 'invoked' Ofgem should then consult further to ensure the requirements are specific to achieving the critical requirements of that project.

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Furthermore, the imposition of such a duty only on licence holders will not capture other non-licensed parties who may also be required to carry out actions in order to give full effect to the switching programme reforms. We do not support any proposal where their co-operation is achieved indirectly through licence holders. Ofgem should consider what actions are required, likely through consultation outlined above, to be sure that all parties are required to engage. In particular, we consider that regulating Third Party Intermediaries is necessary to safeguard consumers and ensure their engagement in the Switching Programme.

EDF Energy recognises that the DCC is best placed to undertake the role, as set out in Chapter 5, which includes incorporation, delivery and provision of the CRS. Ofgem must be mindful that this will considerably increase demand on the DCC as it procures and establishes new functions and obligations under its licence. Ofgem must ensure that these additional requirements are not placed on DCC without assurances that there will be no adverse impact on the roll out of the wider Smart Implementation Programme. Based on our experiences to date, we are particularly concerned by the unsustainable levels of cost currently associated with the delivery of smart metering services. It is therefore fundamentally important that Ofgem ensures robust contractual arrangements are put in place. EDF Energy would not support any arrangements which would permit the DCC to place any additional costs, on industry without prior agreement from stakeholder, including Retail Energy Code Company (RECCo).

We would welcome greater consideration of how development of the REC will interact with the work required across the broader codes environment. Ofgem have set a high bar with the proposed objectives of the REC, however, this should not be progressed in isolation. A cross code plan is required to ensure that improvements are made across the industry which ultimately ensures progress is made to address the areas identified by the CMA. It is essential that all code administration is taken down the same path as is proposed for the REC, failure to do so will create a two-tiered codes environment that does not improve overall accessibility.

We are supportive of the Ofgem ambition that the REC should be accessible and as easy as possible to understand and comply with. Notwithstanding this, EDF Energy does not consider that this ambition is achieved in the schedules as drafted. Ofgem should focus on the ability of parties to clearly understand what is required of them and avoid any confusion which could emanate from seeking to over simplify or providing insufficient detail to ensure clarity.

Our detailed responses are set out in the attachment to this letter. Should you wish to discuss any of the issues raised in our response or have any queries, please Gavin Anderson on 0785 294 8087, or myself.

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

Yours sincerely,

A handwritten signature in blue ink that reads "Paul Delamare".

Paul Delamare
Head of Customers Policy and Regulation

Attachment

Annex 1

Switching Programme: Proposed modifications to regulation and governance EDF Energy's response to your questions

Chapter 2: Transitional requirements

Q2.1: Do you support our proposal to introduce a high level duty upon licensees to cooperate, where appropriate, in delivering the outcome of a significant Ofgem-led programme, such as a SCR?

We are supportive in principle of a high level duty to co-operate, where appropriate. In particular, we support such a duty in relation to the Switching Programme as we consider it will provide a more rigorous framework around delivery. The duty in relation to the Switching Programme should be specific to what is required to ensure successful implementation. This must include the work required to integrate the existing requirements of the MRA and SPAA, as well as the work required to remove or relocate the remaining code content.

However, it is not appropriate to widen the scope of such a duty, instead it should focus on achieving the key requirements the Switching Programme and the significant code review. Given the wide reaching implications we consider that additional application of the duty should be subject to a further consultation process separate to this one.

We are concerned that only placing this obligation on licence holders will not provide adequate coverage across those parties within industry who do not hold a licence. Our experience is that those non-licensed parties can play a significant role in delivering industry wide change. Therefore, Ofgem should consider a suitable mechanism to ensure all parties are obligated to participate. This can be achieved by regulating third parties that are engaged in the energy industry, and should not be achieved by placing the obligation on suppliers

In terms of the proposed licence condition wording, we would welcome some clarity on the extent to which 'cooperate' will be applied. Licensees should, while still acting in good faith, be able to constructively challenge cooperation being sought where it is deemed, for instance, inappropriate or unreasonable.

Q2.2: Do you agree that the RECCo should be established earlier than REC v2 in order to assist with the successful delivery of the Switching Programme?

Yes, we agree that there would be merit in establishing the RECCo in advance of go-live and the REC v2 coming in to effect. This would facilitate an orderly transition from the programme to live operation of the revised arrangements. However, in establishing some of the enduring REC governance arrangements early, there is a need to ensure that the benefits outweigh the costs that would be incurred through such early implementation.

Q2.3: Do you agree that the bodies constituted under the REC could suitably play a formal part in the programme governance?

With reference to the response above, similarly we agree that bodies representing REC parties could also be constituted early and play a part in programme governance. As the programme progresses through to implementation, there will be a need to address emerging issues in an effective and timely manner. It would therefore appear sensible for the bodies that would be responsible for resolving such issues on an enduring basis to take up this function early.

Q2.4: Do you agree that our definition of 'large supplier' in REC v1 is suitable for ensuring an adequate level of engagement with User Entry Process Testing?

We agree with the Ofgem definition of 'large supplier' and that if only large suppliers were required to undertake testing, this definition is robust. However, Ofgem should consider how smaller suppliers are engaged in testing. Our experience of previous testing for industry wide initiatives is that engaging all market sectors is key to ensuring smooth delivery. Smaller suppliers should be able to engage on an opt-in basis and Ofgem should approach smaller suppliers, via the appointed delivery partner, to ensure testing is undertaken against a diverse range of system architecture.

Q2.5: Do you agree that it would be appropriate to have in place interim governance arrangements prior to REC v2 coming into effect?

Until such time as the REC bodies are fully constituted there will be a need to have interim governance arrangements in place. In principle, we support the proposal for the existing MRA and SPAA Executive Committees to act as an interim REC Panel to perform the Panel's duties as and when required. However, a key aspect of developing the REC is that it operates on a dual-fuel basis. It is imperative that MRA and SPAA work collaboratively to ensure this intent is maintained and avoid creating any carve outs that consider gas or electricity in isolation. This further strengthens the need to ensure the application of the proposed duty is made specific to ensuring the right outcomes are achieved. As appose to applying a generic duty which may not cover all parties or be detailed enough to mandate delivery.

We are also supportive of Ofgem acting as an interim REC Manager for any changes that are required to the main body of the REC in advance of a Manager being appointed

Chapter 3: REC Governance

Q3.1: Do you agree with the proposed powers and functions of the RECCo Board, REC Panel and REC Manager, and how they would be distributed amongst them?

The separation and distinct responsibilities seem adequate and provide clear delineation between roles and responsibilities

Q3.2: Do you agree with our proposal that independent Non-Executive Directors (NEDs), potentially from outside of the energy industry, should be present on the RECCo Board and that the composition of the RECCo Board should be subject to thorough review, both periodically and/or whenever the scope of the REC/RECCo Board responsibilities changes substantively?

We are not opposed in principle to the inclusion of independent non-executive directors on the RECCo Board. Also, given the proposed powers of the Board and the consumer centric nature of the REC mission statement, such individuals could be potentially sourced from outside of the energy industry. However, this should not be a prerequisite and that the aim should be to appoint individuals with the necessary proven skills and experience to meet the duties and responsibilities of the RECCo Board.

Notwithstanding the above, we do strongly advocate the need for the composition of the Board to contain at least some individuals that do have extensive energy industry experience, given that it will be the body that sets the overall key strategic priorities for the REC. However, any such individuals should be truly independent and therefore not have any association with existing market participants.

We acknowledge that there is the potential for the REC over time to evolve into a much broader energy code than that currently anticipated at go-live. On this basis it would appear sensible for the governance arrangements to contain provision for the periodic review of the composition of the Board in order to ensure that it remains fit and proper. Where any review is undertaken, it should be a requirement that all REC parties are fully consulted on any proposed changes.

Q3.3: Do you agree with the proposed composition, powers and functions of the REC Panel?

We agree with the proposals set out by Ofgem, but note that further details are required to understand the composition of the Panel. In setting out this additional detail Ofgem should focus on ensuring any representative has the right skills and experience. We are not opposed to some members of the panel being independent, but independence should be balanced against the need to add experience and value to the Panel. Furthermore, it remains unclear how independent members would be sourced and appointed or how such procurement would be funded.

We welcome the flexible approach to engagement as set out in Paragraph 3.43; this represents a fresh and innovative approach which should allow a greater level of engagement from industry parties.

Q3.4: Do you agree that there should be entry and systems testing requirements placed on new entrants, comparable to those that we expect incumbent suppliers to undergo as part of the transition to the new switching arrangements?

We firmly agree that new suppliers should be subject to stringent entry testing requirements in relation to their ability to be able interact with central systems and other parties.

Given that suppliers could incur costs as part of the proposed Guaranteed Standards of Performance, it is imperative that Ofgem ensures that new entrants are capable of meeting all regulatory requirements.

Ofgem should consider how the programme engages with the existing service providers who are likely to provide system capabilities to prospective new entrants. Maintaining an environment for new user testing may not be required if new users are likely to enter the market with 'off the shelf' technology. This is particularly pertinent when considering how such an environment would be funded during development and on an enduring basis.

It is equally important to ensure that an environment is developed to allow for future testing of industry solutions which may be required as the market continues to evolve.

Chapter 4: REC Content

Q4.1: Do you agree with the proposed minimum content for REC v2 (as listed in Appendix 3)? Is there any other content we should consider for inclusion in REC v2? If yes, please provide further details.

EDF Energy agrees in principle with the content set out in Appendix 3, but would seek additional clarity on the following points:

- Prepayment and debt assignment protocol appear to be greyed out – are they out of scope?
- Green Deal – the scope should include the facility to ensure GD customers are only able to be registered to a GD licence.
- Disconnection of an MPxN is seemingly omitted
- MPxN Administration has no associated detail – please clarify
- Export MPANs are not referred to – this should be added to future proof development

Q4.2: Do you agree with our proposal that the REC Code Manager should collate Switching Domain Data and make it available to Market Participants? Or do you consider that the Data Master for each element of Switching Domain Data should make it available to Market Participants?

EDF Energy considers the Data Master for each element of SDD should be responsible for making the data available to those that require it.

It is not clear from the consultation what benefit will be derived from centralising the function of the Data Master through the REC Manager, as this is likely to create an additional layer of governance, which is not required.

Q4.3: Paragraphs 4.20-4.24 suggest that the DCC should be subject to a data quality objective and performance standards around the quality of REL Addresses. Do you have suggestions on the quality measure areas and levels quality measures will take? Do you believe that the REC Panel should have a role in setting these targets (initially and/or on a periodic basis)?

Yes, this is an essential enabler to ensure the accuracy of the central database and is fundamental to ensuring focus remains on continuous improvement. It would be beneficial to form a sub-committee, reporting to the REC Panel which would consider the appropriate KPIs to be set in order to monitor and incentivise the DCC to maintain a high quality of address data. In addition, ME (manually entered) addresses should also be considered for performance monitoring purposes.

Q4.4: Paragraph 4.25 outlines that the REL Address data quality indicator is currently intended to be an internal measure for the CSS. Do you believe there is value in making this available to other market participants? If so, please provide your rationale for this and outline which market participants should have access.

Such data should be available to other market participants as it is fundamental to parties being able to understand the level of risk involved in a switch. Having access to such data will allow parties to respond and react differently depending on the accuracy of the address, for example applying additional validation where address quality is low.

This should be part of a suite of performance reporting available to market participants, including Suppliers, DNOs, MEMs and DC/DA.

Q4.5: Paragraph 4.25. suggests that the DCC should set out the methodology it will apply to meet the REL Address data performance standards on an annual basis. Do you agree that it would be beneficial to make this methodology publicly available?

At a minimum this information should be made available to relevant market participants. Though aspirational, industry should strive to ensure, wherever appropriate, that information is made available publicly to increase accountability and transparency.

Q4.6: Do you support the creation of an Enquiry Services Schedule in REC v2? If so, which of the options around the requirements (in paragraph 4.32) do you prefer? Please provide details to explain your answer.

EDF Energy supports the creation of an Enquiry Service and would recommend Option 2 as the most appropriate approach.

Option 2 provides the right level of differentiation between data relating to switching and that which is not. Ofgem should consider how the governance of this can be managed in the least burdensome way. Separating the data under Option 2 provides the most robust

solution but does introduce the need for multiple applications and multiple parties to access data.

Q4.7: Do you agree with our proposal to create a REC Exceptions Schedule to be contained in REC v2, with the scope outlined in Figure 3? If not, please provide further details.

Yes, an exceptions schedule should be included in RECv2. We consider that Smart Prepayment and Debt Assignment Protocol should be included with the exceptions, unless there is clear rationale for not doing so.

Q4.8: Do you agree that the grey areas highlighted in Figure 3 should be out of scope of an Exceptions Schedule for REC v2? If not, please provide further details.

Ofgem has provided no rationale for the exclusion of Debt Assignment Protocol or Smart Prepayment. We recommend they be included in scope, otherwise Ofgem should provide additional clarity around the proposed exclusion.

Q4.9: A list of suggested content for a set of REC Technical Documents can be found in section 4.44. Do you believe that any of the content listed is unnecessary or is there any content that you would expect to be included? If so, please provide details.

We support the contents of the list in Section 4.44.

Q4.10: Do you believe that table 1 captures all of the items that should become a REC subsidiary document? If not, please provide details of the additional items that should be included and why.

This is a sensible level of content for the subsidiary documents and amount of detail to facilitate handover.

Q4.11: Do you believe we have assigned the correct responsibility for producing each REC subsidiary document? If not, please provide further details.

No comment.

Chapter 5: The DCC licence

Question 5.1: Do you agree with the role we have set out for DCC during the DBT phase and steady state operations? If not, why not?

EDF Energy recognises that the DCC may be best placed to carry out the role as set out in the consultation.

However, appropriate controls will be required, for example through the incentive framework, to ensure that this occurs. We are also concerned that giving the DCC this additional role could create a risk to the smart metering programme through contention for resources and inconsistent priorities across the two programmes.

Question 5.2: Do you believe that our proposed drafting to amend LC 15 of DCC's licence would, if implemented, accurately reflect our expressed intentions? If not, why not?

The proposed drafting accurately reflects Ofgem's intentions. Additionally, Ofgem should consider how best to measure whether the DCC has successfully achieved the objectives as set out, which could be met via performance reporting.

Question 5.3: Do you agree with our proposal to add new CRS specific price control terms. Do you think any of these terms are unnecessary or are there other terms we should consider adding?

We support the proposal to add new CRS specific price control terms to cover both the Design, Build and Test (DBT) and Steady State operation of the service. In order to protect the interests of both the industry and consumers Ofgem must continue to ensure DCC incurs costs in an economic and efficient manner. This should be achieved through the addition of ex-post plus arrangements which should not be too onerous upon the DCC to provide without delaying Ofgem's price control review of DCC expenditure. In order to prevent confusion for the DCC, on the additional reporting they are required to provide, Ofgem need to ensure DCC fully understands their additional reporting deliverables.

We do not consider any of the terms proposed by Ofgem to be unnecessary. We support a requirement for the DCC to update stakeholders throughout the year to make costs incurred more visible. Stakeholders require confidence they are receiving value for money, with DCC costs being tightly managed, and with no surprises or changes requiring additional funding.

EDF Energy is concerned with DCC only reporting progress against the CRS business case at a programme level. This will not adequately inform stakeholders of the severity of risks in order to balance these against the impact on functionality, time, cost and quality, as well as how these align to DCC's identified deliverables and activities.

Question 5.4: Do you agree with the high-level programme outcomes we believe the programme should look to incentivise? Can you suggest further areas we should look to include and are there aspects you believe should be prioritised?

We agree with the high-level programme outcomes identified by Ofgem. However, it is surprising that, despite being referred to in the proposed DCC licence amendments, improving consumers experience of switching does not feature as one of the high-level programme outcomes.

EDF Energy supports the high-level outcome that any solution should include 'adaptability to future market transformation', however it is important that this is balanced against the need to ensure the service is delivered as cost-effectively as possible and without incurring any regret spend. Adaptability can incur significant cost; Ofgem should not seek to develop a system that covers all eventualities or cater for future changes where there remains significant uncertainty.

Chapter 6: The SCR process

Q6.1: Do you agree with the changes that we propose to make to the scope of the Switching SCR?

The proposed changes to the scope of the SCR appropriately reflect the policy changes made since the launch of the SCR in 2015.

Q6.2: Are there any further changes that you consider we should make, either to bring something into scope, or to explicitly rule it out of scope?

None recommended.

Q6.3: Do you agree with our proposed approach of publishing the drafting of all SCR related changes circa Q1 2019, but waiting until systems have been proven through testing before submitting the proposals into the modifications process?

Ofgem is right to reflect on lessons learned from previous significant industry change, most notably the issues that arose during the latter stages of Project Nexus. We are therefore supportive of Ofgem undertaking an end-to-end programme management role. Together with the proposed high level duty upon licensees to cooperate, where appropriate, in delivering the outcome of the Ofgem-led programme should ensure that change is delivered in an efficient and timely manner.

In terms of the conclusion of the SCR process, we are supportive of Ofgem developing the code modification proposals (including legal text) which will then become subject to the relevant governance procedure of the respective codes. In order to ensure such code modification proposals are complete, reflect, and are complementary to, the final systems design, it is right that such proposals should be raised at a late stage in the DBT phase. However, as proposed, Ofgem should publish early drafts of such proposals in order to allow for appropriate stakeholder consultation.

Annex 2 Comments on draft Schedules

Overall

The method used in the draft schedules to show where a processes step should reference a different part of the schedule is very confusing. Currently the link is captured in the 'method' column as well as in the footnotes. Overall, the drafting should avoid capturing important information as part of footnotes or duplicating information in multiple places, as this diminishes the understanding and ease of use.

An example is provided below:

| Ref | When | Action | From | To | Information Required | Method |
|-------|---|---|------|----|----------------------|------------------------------|
| 7.1.7 | Following Registration Request Status update to 'Validated', and within timings defined in the Technical Specification. | Issue Notification of Switch Request being Validated. | | | | As defined in paragraph 13.2 |
| 7.1.8 | Following Registration Request Status update to 'Validated', and within timings defined in the Technical Specification. | Issue Synchronisation Message for Switch Request being Validated. | | | | As defined in paragraph 13.2 |

Paragraph 13.2 covers all relevant details in "From", "To" and "Information required". Therefore, including as above, replicates data that is not required. This could be further amended to just have one process step as follows, due to "When" being at same point:

| Ref | When | Action | From | To | Information Required | Method |
|-------|---|--|------|----|----------------------|------------------------------|
| 7.1.7 | Following Registration Request Status update to 'Validated', and within timings defined in the Technical Specification. | Issue Notification of Switch Request being Validated. Issue Synchronisation Message for Switch Request being Validated. | | | | As defined in paragraph 13.2 |

Data Management

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| 2.5 & 3.3 | This approach seems overly complex. The process can be simplified to a two-way handshake of a party sending a message and the receiving party confirming receipt. |
| 5.1 | We do not consider that REC Code Manager should adopt a role of responsibility in regard to MDD. The existing provisions should be maintained, unless the data is specific to the REC. |
| 5.6 (b) & (c) | This section suggests that request will be rejected in CSS if a Green Deal customer attempts to switch to a non-Green Deal supplier. We are supportive of this as it will improve the experience for customers and suppliers. |
| 5.6 (j) | This does not need to be an exhaustive list, however it should include all current known parameters e.g. advance registration period, standstill period etc. |
| 5.8 | Clarity is required on when methods of delivery will be defined. |
| 5.11.3 | This Paragraph seems to indicate that REC can apply sanctions without informing other relevant parties e.g. BSCCo. |
| 6.6 & 6.10 | The values of X should be 1 working day by default. |

Registration Services

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| 1.1 (a) | Add details to show it includes objections, withdrawals and annulments. |
| 1.3 | Including a Transporter initiated registration is not aligned to the CSS being a supplier led process. |
| 2.3 (a) | Unable to find a definition that confirms 'days' refers to calendar days. |
| 3 | It is unclear what is being referred to – new connections, gas reconnections? |
| 3.3 | Clarity required around the intention and absolute nature of these times. Is 17:00 fixed? It is not clear if the times are 'time sent' or 'time processed' Working days are not referenced – does this mean start date can be a Saturday? |
| 5.2 | We would like to see the day ahead/ two day ahead and gate closure timings check be added in a specific list. |
| 5.9 | In this event, the market participant would need to be notified. |
| 6.1 | Clarity required – confusion between this section and 7.1.16 – text suggests a response is required to confirm if an objection is not being raised. |
| 7.1.11 | Need to include step before this to include the available options at this juncture. |
| 7.1.12 | Include detail that if objection window is still open then go back to 7.1.10 otherwise to 7.1.16. |
| 7.1.16 | Include details of how OFAF MPxNs are treated and how this interacts when dealing with related MPANs. |
| 9 | Equivalent sections carry a requirement to store reasons for one year, seems appropriate here too. |

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| 10.4 | Agree that ability to annul in bulk is worthwhile. However, need to consider if a request is made to register multiple MPxNs and only one needs to be annulled, this can be done without the need to annul the whole batch. |
| 11.2 & 11.3 | 'shall' should be amended to 'may' – given it is three weeks prior to the switch date this should be within the suppliers control. |
| 12.2 & 12.3 | These requirements would be met earlier in the process – suggest to add “shall, where not already complied with”. |
| 14 | Needs to include detail of sites that have a RMP status of 'Dormant' or 'Terminated'. |
| 14.5.2 | Need to add details that if rejected can go to 14.5.3, otherwise to 14.5.4. |
| 15.4.2 | Need to add details that rejection continue with 15.4.3 and acceptances with 15.4.4. |
| 16.4.2 | Need to add details that rejection continue with 16.4.3 and acceptances with 15.4.4. |
| 16.5 (a) | The CSS should not be assuming or determining what action is intended by the supplier. |
| 17.2.4 | Makes reference to use of MEM variant but section does not seem to limit this update to MEMs only but to all agents. |

Change Management

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| Overall | We support Option 1 where all parties will have the right to vote on change proposals; this will provide the ability for parties to have their views represented. |
| | In terms of parties voting, this should be one vote per organisation i.e. where a corporate group has a number of licences and therefore parties to the REC, voting rights should be applied at a corporate level. |
| | Should provide flexibility in terms of the Change Path; it may be possible that a proposal at the outset may appear to be more relevant for self-governance and be given that Change Path, yet during assessment (by Expert Group) it may become apparent that the impact of the proposal (or any alternative) may have much wider implications that were not originally envisaged and which would make it more relevant for an Authority determined proposal. On this basis, the Schedule should facilitate the possibility of proposals moving between Change Paths as they proceed through the process. - It is unclear what the intent is of Paragraph 12.5; where it appears Ofgem have the ability to require the withdrawal of an Authority Change Proposals. |
| 4.4(i) | Additional detail is required to understand the release arrangements for the code. Will this be restricted to quarterly releases or determined per change. |
| 5 | A change proposal register is definitely required. However, detailed consideration needs to be given to how change documentation is made |

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| | available to industry parties. Requirements should be placed within code governance to ensure this is done in a fashion that ensures accessibility. |
| 8 | It seems premature for Panel to be involved at this stage. The Code Manager seems appropriately placed to perform this function. This will allow the Panel to be used for escalation purposes. |
| 8.5 | This process seems to unduly favour those parties that may have resources to be involved in all pre-assessment discussions or expert groups. We have experienced issues with a similar approach relating to the new Data Services Contract (DSC) arrangements, where solutions are proposed by parties to benefit their own organisation. It is imperative that all parties have the opportunity to feed into the proposals via consultation. |
| 12.5 | It is unclear what the intent is, it appears Ofgem have the ability to require the withdrawal of an Authority Change Proposals. |
| 15 | REC Panel should have no say in the voting process. As previously stated, we consider Option 1 to be the most appropriate. |

Address Management

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| General | The schedule does not include details of how suppliers will receive appropriate updates regarding the allocation or any changes to the REL. |
| 2.3 (d) | It is vital that market participants are made aware how any quality indicator is arrived at. Additionally, we consider a KPI should be developed that tracks and reports on the strength of the indicator. |
| 2.4 (c) | Clarity required on possible exceptions where two locations would share a communications hub. |
| 2.6 | We support the inclusion of an 'Address Quality Objective'; however we note there is no reference to the consequences or actions which will occur if the Objective is not met. This is fundamental to ensuring accountability; therefore we would welcome clarity on where this would be incorporated. |
| 3.1 (a) | To operate effectively this should also be defined when the REL value is initially populated or migration. |
| 3.1 (c) | Could you please provide rationale for maintaining this data for seven years? |
| 4.3 | How will data cleanse activity be driven / mandated prior to implementation? How will this be reported / followed up i.e. will this be managed via an Industry forum? |
| 5.4.4 | Consideration should be given to a message of completion being returned to the requestor. |
| 6.5.1 | It is unclear if details in 'Information Required' are equal to those in 5.4.1 or would these differ depending on it is an update or new request. |
| 6.5.3 | Include reference 'if request rejected continue to 6.5.4, otherwise to 6.5.7' |
| 7.4.1 & 7.4.6 | Agree this cannot be defined at present – however, this will need to be defined and so the holding words should say 'to be defined', as 'Not |

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| | Defined' suggests it will remain undefined. |
| 7.4.2 | Need to add if no update required then go to 7.4.6 otherwise to 7.4.3. |
| 8.4.2 | Need to add if no update required then go to 8.4.6 otherwise to 8.4.3. |
| 8 | This paragraph reads to suggest it only applies to new meters – it would be appropriate for this to also apply to removed/decommissioned meters. |

Transition Schedule

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| 4.1 (a) (vi) | The term 'Live Proving' is not clear – if this is meant to be market trials testing, we should make this clear. |
| 4.4 | We are not able to find definitions of the terms – User Entry Process Testing End to End Testing |
| 6 | We have understood this to mean self-certification, without any central assurance. Assuming this interpretation is correct, we are concerned this may not provide the right level of assurance to all parties. |
| 6.1 | This approach is likely to drive significant confusion. It is key that parties co-operate around their approaches to 'in flight'. |
| General | The schedule does not include detail relating to the development of test or pre-production environments of the CSS. We would welcome clarity on where/how this will be incorporated. |

Interpretation Schedule

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|---------------------------------|--|
| General | A number of the definitions include the defined term in the description, therefore a definition is not fully provided. E.g. Active, Annulled, Cancelled, Change Path, Created, Domestic Premises Indicator, OFAF Group, Rejected, Submitted and Withdrawn. |
| General | A number of definitions, such as Annulment Request, include wording "via a CSS Message". A definition should not include details of any method of provision of data related to this term, as that should be in other technical specification schedules. There are a number of instances of this e.g. Change of Domestic Premise Indicator Request, Change of Shipper Request and Switch Request. |
| General | Rather than being Section 3, this should be moved to the front of the schedule to aid understanding. |
| Data Model | This definition is unclear – we recommend the same approach as used in "E2E Data Architecture and Data Governance Model" is used. |
| Defect management plan | It is not appropriate to include who is producing the document as part of the definition. |
| Meter point registration system | In the MRA this is defined as the Meter Point Administration Service (MPAS), has this been changed intentionally or should it be consistent. |
| One fail all | The definition of this should not include the term OFAF Group. |

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| fail | |
| Registration Effective Through Period | Please clarify what this term is trying to define and in what unit of measurement. Is a term also required to define end date of any RMP registration similar to "Registration Effective To Date" and "Confirmation End Date" in electricity and gas now? |

EDF Energy
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