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Sent by email only to: switchingprogramme@ofgem.gov.uk

Dear Rachel,

Switching Programme and Retail Code Consolidation Consultation

We continue to support the development and implementation of the Retail Energy Code that will govern the new faster and more reliable switching arrangements, in addition to Ofgem's broader ambitions to consolidate further code content into the REC, to create a best in class code that will deliver excellent consumer outcomes. We welcome the detail that Ofgem has set out within this consultation and the opportunity to respond.

REC Governance Arrangements

We support the establishment of more modern and flexible change governance arrangements for the Retail Energy Code and support the appointment of an empowered Code Manager that will identify and deliver change within an efficient modification process.

It is important that energy suppliers are suitably represented within the modification decision making process, with every supplier and party impacted by change being consulted with. This can be achieved within arrangements as set out, providing all parties are offered the opportunity to vote on modifications. For modifications requiring authority consent, parties should have the ability to appeal to a suitable authority, such as the Competition and Markets Authority. There is a requirement to ensure that appropriate, consistent and accessible appeal processes are established. This currently varies across codes, not all decisions are appealable and, those that are, are often through different routes.

We support the proposals for the introduction of the REC Performance Assurance Board, ensuring that there are robust procedures in place to support the effective operation of the REC and address poor performance and non-compliance with code

obligations. This is particularly important where non-compliance materially impacts upon consumers and other suppliers' ability to efficiently serve their customers.

We support the ambition to establish the REC PAB at the earliest opportunity. If the PAB becomes operational immediately, i.e. during the post implementation window, then the PAB must ensure that any non-compliance with code obligations is the fault of the party under scrutiny and not as a result of underlying transitional issues from the implementation itself.

Delivery Approach

We believe that the proposed choreography of the switching programme SCR, retail code consultation SCR and associated licence changes offers a pragmatic approach to a potentially complex cutover from the existing to new governance arrangements.

We do however have some concerns with the timescales as set out for the switching SCR related licence changes and consequential code changes. Both sets of changes are planned to be baselined late in the DBT phase. In order to reflect these accurately within our internal designs we would welcome Ofgem bringing forward their plans to baseline this content. Alternatively, Ofgem should engage with industry to plug any potential gaps between policy design and signed off drafting to mitigate design & build risk that parties are carrying, particularly for topics such as the new cooling-off arrangements.

Retail Code Consolidation: SCR Scope, Process and Proposals

We agree with the proposal for Ofgem to lead an end to end process to develop all necessary code modifications to deliver Retail Code Consolidation. This should help to ensure that the post-SCR governance arrangements are complete, coherent and complementary. We support Ofgem's view of the scope of the REC consolidation SCR, including the management of the SPAA and MRA provisions and their move into other codes.

We do not support the ambition to reform the SMICoP through the SCR. We believe that some of the existing SMICoP provisions are overly prescriptive or duplicated elsewhere in licence. Consolidation of the SMICoP arrangements into the REC provides a good opportunity to move to a less prescriptive, but more principle and outcome-based set of requirements. As per the approach being taken with the Theft arrangements, we would welcome a full review of the SMICoP governance arrangements, undertaken by the SMICoP Governance Board, ahead of consolidation into the REC to ensure that the code remains relevant and fit for purpose.

We have provided answers to the questions posed within the consultation in Appendix A below.

We would be happy to discuss our response and thoughts with you in more detail. Should you have any immediate questions please contact myself or Adam Iles (adam.iles@centrica.com).

Yours faithfully,

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APPENDIX A

Chapter 1: REC Governance Arrangements

1.1: Do you agree that the mission statement and objectives encapsulate the functions of the code, can drive activity of the governance functions and assist decision-making on changes to codes?

We agree with the proposed mission statement. We also welcome the proposal to introduce a new triage function to carry out specific assessment of code changes that will include the impact on consumers, innovation, competition and market stability. We see the introduction of this as an improvement on the current arrangements and will help to ensure code changes are appropriately impact assessed and prioritised.

1.2: Do you agree with our proposals on the initial and ongoing appointment of RECCo Board Members?

We agree with the proposals for the initial and ongoing appointment of RECCo Board Members. We agree that it will be important to recruit Board Members who have, as a minimum, relevant experience of, or expertise in, REC party constituencies and RECCo functions. We also agree that RECCo Parties should have the ability to hold the enduring Board accountable for their performance including the ability to reflect poor performance in their remuneration and also instigate removal of board members in extreme cases.

1.3: Do you consider that the methodology as set out above is appropriate?

See 29th July response.

1.4: Do you have any comments on the scope of services?

See 29th July response.

1.5: Do you agree with our outline proposals on the set-up of the REC Manager?

See 29th July response.

1.6: Do you agree with our proposals on the set-up of the REC Change Panel? Do you foresee any problems with these proposals?

Insofar as the REC will require the establishment of a Change Panel, we agree that it should be constituted with the right blend of individuals to represent the interests of the wide array of REC stakeholders, including the introduction of independent members to represent the consumer. It remains critical however that code parties are sufficiently represented.

However, there are recognised weaknesses with the panel recommendation model and with a large number of suppliers currently operating in the market, there are

inherent difficulties ensuring that a single representative can effectively represent the views of all of its constituency.

As we have stated previously, for the purposes of the REC, we favour the introduction of a straight-forward, transparent process which is based upon the existing SEC modification and change board arrangements. This model enables code parties and independents to be consulted on all change proposals, encourages responding parties to provide reasoning for their responses by reference to the SEC Objectives and provides for a structured change board voting process which then determines, via a party category voting process, whether each change should be recommended to the Authority (where required) for approval. This allows every party an opportunity to have their say on proposed change and provides the constituency representative with an unambiguous view of the constituency support for a change.

Parties should have the ability to appeal to a suitable authority, such as the Competition and Markets Authority.

1.7: Do you agree with our proposals on the set-up of the PAB? Do you foresee any problems with these proposals?

Yes, we agree with the proposals on the set-up and operation of the PAB to ensure that there are appropriate assurance procedures in place to support the effective operation of the REC. Failure to address poor performance and non-compliance with code obligations, particularly where with materially impacts upon consumers and other suppliers, should be addressed through an array of sanctions available to the REC PAB within their tool-kit to seek remedial plans, liability payments / damages and ultimately restriction of registration rights.

We support Ofgem's view that the establishment of an effective PAB may take some time and therefore agree with the approach to establish the PAB during the transitional period, such that it has the opportunity to be fully operational at the implementation of the new switching arrangements. However, we believe that during the period immediately after go live whilst the new arrangements are still being proven in live operation, that it would be prudent to ensure that before pursuing individual parties for poor performance, that the PAB can be satisfied that the supplier in question has not seen their performance impacted by underlying issues with the implementation itself, such that it is not held accountable for the failings of others and issues outside of their control.

Where possible, monitoring by the PAB should be based upon data available centrally (i.e. from the CSS, DTN etc) to reduce the reliance parties for the provision of data which can often be quite onerous to fulfil and can lead to inconsistency of reporting.

1.8: Do you agree that the inclusion of the principles outlined (as included in the draft change management schedule) should address some or all of the problems associated with existing code governance?

Please see our response to question 1.6 above.

Chapter 2: Delivery Approach

Question 2.1: Do you agree with our proposed choreography of the Retail Code Consolidation SCR, Switching Programme SCR and associated licence changes, including our proposals that the Switching Programme changes will be introduced as 'dormant' before being made 'active' following Authority direction?

Yes, we agree with the proposed choreography of the SCR and licence changes and see this is a pragmatic approach to a potentially complex cutover from the existing to new governance arrangements.

Question 2.2: Do you agree with the approach we have described for managing the delivery of the Switching Programme SCR and the Retail Code Consolidation SCR?

We largely agree with approach that Ofgem has described for managing the delivery of the SCRs but have concerns in relation to the timing of when Ofgem intends to formally raise the code modifications for the Switching Programme SCR in Q4 2020 for decision in January 2021, 5 months prior to the go live of the new switching arrangements. Our preference would be for the changes to be baselined, raised and approved through relevant code governance as soon as possible to provide certainty over the scope and drafting of the proposed changes. This is particularly important where proposed modifications will impact upon our system and process design and will result in changes being delivered as part of our FMRS delivery programme.

In the absence of the modifications being made to industry codes early in 2020, we would ask Ofgem to provide greater clarity over how these changes and associated legal text would be baselined under programme governance, to ensure that we have a sufficiently reliable view to be used as an input into our design.

Question 2.3: Do you have any views on the draft consequential changes to industry codes and work plans described in Appendix 5 that would help deliver the Switching Programme and Retail Code Consolidation SCRs?

We will review in detail when published in full as part of the proposed consultation in the autumn.

Chapter 3: REC Operational Arrangements

Question 3.1: Do you agree that the draft Registration Services Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

We agree that the draft Registration Services Schedule generally meets the required standards as set out in the regulatory design principles. The document structure provides a clear and concise view of the various registration processes.

However, as we stated in our response to the “Consultation on Proposed Modifications to Regulation and Governance” last November, it is not optimal that critical information in relation to the timing and SLAs around key interactions and processes is to be held separately within the Technical Specification. This compels users to cross reference the Registration Services Schedule and Technical Specification, which will inevitably make it more difficult to engage with the content and clearly understand our obligations. We do not believe that drafting the schedule in this way is consistent with all of the design criteria agreed for the establishment of the REC operational schedules, particularly in terms of providing coherent and accessible requirements for REC parties.

We still believe it to be more appropriate to include detail on timescales and SLAs within the schedule itself to support ease of access for users of the REC.

Question 3.2: Do you agree that the draft Address Management Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

Yes, we agree that the draft Address Management Schedule meets the required standards as set out in the regulatory design principles.

Question 3.3: Do you agree that the draft Data Management Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

Yes, we agree that the draft Address Management Schedule meets the required standards as set out in the regulatory design principles.

Question 3.4: Do you agree that the draft Service Management Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

Yes, we agree that the draft Address Management Schedule meets the required standards as set out in the regulatory design principles.

Clause 7.2 places an obligation on Energy Suppliers to notify the Switching Service Desk via the portal in advance of placing any “exceptionally high demand” on the switching arrangements. It would be extremely helpful for Ofgem to set out some thresholds at which suppliers might be expected to report an increase in demand to the Switching Desk and over what period of time, either expressed as percentage uplift or absolute volume. This will help to ensure that all suppliers adhere to this obligation consistently. Where high demand may be as a result of a SoLR event, it

would be reasonable to expect that the Switching Operator is already aware of the potential increase in demand and therefore we that this obligation does not apply.

Question 3.5: Do you agree that the draft Entry Assessment and Qualification Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

Yes, we agree that the draft Entry Assessment and Qualification Schedule meets the required standards as set out in the regulatory design principles.

It would, however, have been preferable for Ofgem, at this stage, to better define how a supplier is to determine whether the "Material Change" threshold has been reached, requiring that supplier to enter re-qualification. We note the explanation that the current definition of "Material Change" allows the PAB, once appointed, to provide further clarity on the materiality threshold. We would expect the PAB or Ofgem to consult with industry prior to elaborating this definition to ensure that it can be consistently applied across REC Parties of different sizes and operating models, ensuring that it is proportionate the risk that parties create to the E2E switching arrangements when deploying change. The PAB should also consider the incentives that suppliers already have to ensure that they do not compromise the integrity of their systems and ability to efficiently operate in the market – the commercial and reputational risks of not thoroughly testing material change prior to its implementation may in itself be sufficient to mitigate the risk that supplier poses to industry.

Question 3.6: Do you agree that the draft Resolution of Consumer Facing Switching and Billing Problems Schedule meets the Regulatory Design Principles? If not, please explain how the Schedule could be improved?

Yes, we agree that the draft Resolution of Consumer Facing Switching and Billing Problems Schedule meets the required standards as set out in the regulatory design principles.

We previously expressed some concerns that some of the exception processes as defined and carried forward in their current guise, would not be wholly fit for purpose in a next day switching world. We note Ofgem's position set out in the consultation document, that the current arrangements as captured would still support resolution of consumer problems. We accept this but it remains the case that significantly reduced switching timescales could create a consumer expectation that all switching related processes can be concluded in significantly reduced timescales. Therefore, we remain unsure how appropriate the procedures are for processes such as DAP, ETs and Switch Metering Read Exceptions where resolution of these exceptions can ordinarily take many weeks.

We still think that there is scope to consider whether further change to these arrangements is required, either directly through the programme or via existing code modification groups.

Question 3.7: Do you agree that we have adequately captured the requirements of the ETCC within the draft Resolution of Consumer Facing Switching and Billing Problems Schedule, taking account of the existence of Guaranteed Standards of Performance that cover engagement with the consumer and resolution of erroneous transfers?

Yes, we agree that the requirements of the ETCC have been captured within the schedule.

Question 3.8: Do you believe there is merit in extending obligations relating to the resolution of Erroneous Switches, Crossed Meters, Switch Meter Read Problems and Duplicate Meter Points to micro-business consumers or should these requirements more generally apply to all Non-Domestic Energy Suppliers? For Switch Meter Read Problems, should the scope be extended to cover domestic and micro-business consumers who are settled on a Half-Hourly basis?

We believe that the implementation of the REC provides a good opportunity to introduce greater alignment of retail governance arrangements, but this should only occur where there is a demonstrable need to incur this change. Any proposals to extend these obligations into the non-domestic sector, should therefore be targeted at those customers who would benefit from it, to address instances where the current arrangements create detriment. It would certainly not be appropriate to extend these obligations into the I&C market for larger and more complex sites.

Question 3.9: Do you agree with our proposal to introduce a harmonise procedure for escalating delayed and disputed problem resolutions for all problem areas covered by the draft Resolution of Consumer Facing Switching and Billing Problems Schedule? If not, please explain how the approach for escalations could be improved.

Yes, we agree with the approach as set out to introduce harmonised escalation procedures. Industry is already taking forward some improvements to the escalation procedures, being driven through the Secure Communications work group. Ofgem should consider whether this workstream has any further suggestion as to how the approach could be improved.

Question 3.10 Do you agree that the draft Prepayment Arrangements Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

Yes, we agree that the draft Prepayment Arrangements Schedule meets the required standards as set out in the regulatory design principles.

Question 3.11: Do you agree that the draft Related Metering Point Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

Yes, we agree that the draft Related Metering Point Schedule meets the required standards as set out in the regulatory design principles.

Question 3.12: Do you agree that the draft Data Access Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

Yes, we agree that the draft Data Access Schedule meets the required standards as set out in the regulatory design principles.

Question 3.13: What changes would you make to best align the draft Data Access Schedule to the Energy Data Task Force recommendations?

We do not have a view on this question at this particular time. We would suggest that it would be prudent, if it has not already happened, for Ofgem to share the draft Data Access Schedule with the Energy Data Taskforce to seek their input in ensuring that their recommendations and thoughts around future developments are incorporated.

Question 3.14: Do you agree that obligations should be placed on networks and suppliers to ensure that RECCo procures gas and electricity enquiry services and that obligations in the Gas Transporter and Distribution Licences can be removed?

We do not have a view on this question.

Question 3.15: Do you agree that the RECCo should be able to appoint either the Code Manager, Enquiry Service operator or a third party to act as the Enquiry Service Administrator for the purpose of monitoring compliance and managing Data Access Agreements?

Yes, we agree that RECCo should be able to appoint either the Code Manager, Enquiry Service Operator or a third party to act as the Enquiry Service Administrator.

Question 3.16: Do you agree that the draft Interpretations Schedule meets the required standards set out in the Regulatory Design Principles? If not, please describe how you think it should be improved.

Yes, we agree that the draft Interpretations Schedule meets the required standards as set out in the regulatory design principles.

Question 3.17: Are there any other areas that you think should be covered in the REC to support the Switching Programme, other than those that will be included in the Technical Specification?

We will be able to offer a full view when the drafting of the Technical Specification and its subsidiary documents is provided. Looking at the proposed Technical Specification contents, there are no obvious additional candidates for inclusion that stand out, but in any event, we would expect any additional documents established over time to be incorporated.

As more information materialises around the design and planned utilisation of the various CSS Adaptor services, Ofgem may wish to consider if it is appropriate to include a section on Adaptors within the Service Definition documentation, given that they may form a critical part of the overall switching arrangements.

Question 3.18: Do you have any additional comments on the drafting of any of the schedules, in particular in relation to whether they effectively achieve the outcomes described here and articulated in Design Baseline 4 or other programme documents?

We do not have any additional comments at this time.

Chapter 4: Retail Code Consolidation: SCR Scope, Process and Proposals

Question 4.1: Do you agree that Ofgem should lead an end-to-end process to develop the code modifications to deliver retail code consolidation?

Yes, we agree that Ofgem should lead an end-to-end process to develop the necessary code modifications (i.e. Option 3). This should help to ensure that the post-SCR governance arrangements are complete, coherent and complementary. Options 1 and 2 are not preferred as they could lead to the fragmentation of ownership and responsibility for the delivery of the revised drafting, imposing greater risk and complexity to the programme.

Question 4.2: Do you agree with the proposed scope of the Retail Code Consolidation SCR? Do you think any additional areas should be in scope?

Yes, we agree with the proposed scope of the REC Consolidation SCR. We believe it is appropriate and beneficial for the SCR to include within the scope the complete management of MRA and SPAA provisions and their move into other codes. Furthermore, we support the SCR scope including consequential change management for other codes to ensure that cross-code changes are dealt with in a consistent manner.

Question 4.3: Which option outlined above do you think is best suited to govern MPAS (as defined above) once the MRA has closed, and why?

See 29th July response.

Question 4.4: Do you have serious concerns about the suitability of any of the options for the future governance of MPAS, outlined above?

See 29th July response.

Question 4.5: Do you agree that the GDAA and Green Deal related provisions in the MRA should transfer to the REC?

Yes, we agree that Option 2 is the most appropriate and that GDAA and MRA related provisions should transfer to the REC. We also agree that this should not be on the critical path for the programme – Option 1 should be retained as a backup plan should the full transfer of GDAA provisions into the REC not be possible within programme timescales.

Question 4.6: Do you think GDAA parties should accede to the REC, or be engaged in governance through some other means?

The benefits of moving the GDAA and related arrangements to the REC is that GDAA parties would benefit from having an empowered Code Manager, efficient change management processes and a robust performance assurance regime. Parties may not necessarily therefore need to fully accede to the REC to deliver these benefits. For example, Green Deal arrangements could be contained within a schedule or annex to the REC that has its own governance arrangements that would allow non-traditional REC parties to receive the aforementioned benefits without the complexity of full REC governance. This would be consistent with the desired outcomes of the Energy Codes Review (e.g. ease of access and understanding for smaller parties, less complex arrangements, empowered code management).

Question 4.7: Do you agree that the requirements currently held in SPAA Schedule 22 and the RGMA Baseline related to gas meter agent appointments and MDD should be mandatory for domestic and non-domestic suppliers? If not, why not?

Yes, we agree that the requirements currently held in SPAA Schedule 22 and the RGMA Baseline related to gas meter agent appointments and MDD should be mandatory for domestic and non-domestic suppliers.

Question 4.8: Do you agree with our preferred option for governance of agent appointments and MDD, outlined as option 3 above?

Yes, we are supportive of Option 3 and the transfer of the gas agent appointment provisions and electricity provisions related to MEM appointment and MAP notifications to the REC, along with relevant metering MDD. Option 2 is a feasible alternative, but this would not take advantage of the opportunity to harmonise governance of gas and electricity industry processes and is therefore not our preferred option.

Question 4.9: Do you support our proposal for consolidating the metering CoPs into the REC?

Yes, we agree that the metering CoPs are good candidates for rationalisation of governance under the REC. The companies subject to the CoPs tend to be active in both fuels and their activities are strongly linked to the retail market. Participants under the current CoPs should also benefit from integration with the REC through standardised processes, a single Code Manager etc.

Question 4.10: Do you think MEMs should be parties to the REC?

Yes, we agree that MEMs should be parties to the REC. MEMs are responsible for the provision and quality of industry data and associated processes. Being party to the REC would help to ensure that their rights, obligations and performance assurance management can be clearly set out and form a clear divide between the commercial role they undertake for suppliers.

Question 4.11: Do you think changes to the metering Schedule(s) of the REC should be progressed through the Change Panel only, or should there be an additional MEM Panel?

Careful consideration needs to be given to the constitution and operation of the REC Change Panel to ensure that it is effective as possible. For the more technical metering codes, or CoPs, we need to ensure that the relevant technical experts are still afforded the time and opportunity to develop, debate and take forward change. This may be achieved in sub-committees to the Change Panel (or elsewhere) and the Change Panel being more of a formal approval process. For example, currently for MOCOPA there is a Review Panel, with voting rights, and a Working Group, open to all. The Working Group could continue once within REC Governance to ensure consistency in technical expertise whereas the Review Panel could be superseded by the Change Panel (subject to appropriate representation being agreed). This issue will apply to other elements of code consolidation and the same will apply. Code consolidation should not lead to parties being disenfranchised from the change process, lead to inefficiencies in the process or an inferior process to those that exist today.

Question 4.12: Which of the requirements within SMICoP, if any, should extend beyond the initial installation of the smart metering system?

We believe the existing SMICoP provisions are overly prescriptive, duplicate provisions elsewhere (e.g. licence) and also cover obligations that already could apply to non-smart activity. Consolidation into the REC is an opportunity to move to a more principle and outcome-based set of requirements with less prescription and increased flexibility for suppliers (and installers). Rather than a piecemeal approach of looking at each obligation and determining whether it should, or could, apply beyond the initial installation, our preference would be for a full SMICoP review to be carried out prior to consolidation. This review should be carried out by the SMICoP Governance Board and this would be consistent with the proposed approach to the Theft Arrangements.

Question 4.13: Which of the requirements within SMICoP, if any, should apply to installation of non-smart metering systems and other site visits required to carry out metering related work?

As in our answer to Q4.12: We believe the existing SMICoP provisions are overly prescriptive, duplicate provisions elsewhere (e.g. licence) and also cover obligations that already could apply to non-smart activity. Consolidation into the REC is an opportunity to move to a more principal and outcome-based set of requirements with less prescription and increased flexibility for suppliers (and installers). Rather than a piecemeal approach of looking at each obligation and determining whether it should, or could, apply beyond the initial installation, our preference would be for a full SMICoP review to be carried out prior to consolidation. This review should be carried out by the SMICoP Governance Board and this would be consistent with the proposed approach to the Theft Arrangements.

Question 4.15: What are your views on our proposals for the governance and assurance of the SMICoP provisions once migrated to the REC?

We are supportive of the proposed governance and assurance arrangements for SMICoP provisions once migrated to the REC. We agree that the audit and customer survey requirements should be retained in the REC, however, these should be kept under review by the SMICoP Governance Board as the content and need for them may change prior to SMICoP consolidation within the REC. The existing governance and change provisions with SMICoP (Section B) would no longer be required and, as per the proposals, the remaining SMICoP provisions would be subject to REC Change Panel and PAB oversight.

Question 4.16: Do you agree with our proposal for incorporating PSR provisions in the REC?

Yes, we agree with the proposal of incorporating PSR provisions in the REC. This will not only harmonise the arrangements for both gas and electricity but is also beneficial as the majority of the existing PSR code provisions relate to rules around the population of the relevant data flows – and the migration of these provisions to the REC is closely linked to the migration of the data catalogue provisions.

Chapter 5: Licence Condition Changes

Question 5.1: Do you agree that Appendix 4 accurately describes all of the changes that should be made to licences to support the effective operation of the new switching arrangements?

Yes, we believe that appendix 4 accurately describes the changes that should be made to the supply licence to support the operation of the new switching arrangements.

As we have stated in programme discussions and within other submissions, most recently in response to the plan on a page, we would welcome Ofgem publishing proposed licence drafting, particularly in respect to the 5-day switching backstop and cooling off obligations, as soon as possible and earlier than the current stated plan. We have a dependency on the receipt of baselined licence drafting for our design and build activity and while we can make assumptions based upon earlier policy papers and decision documents, until the drafting is baselined, we carry a risk of having to incur re-work if we find that design assumptions we've made are incorrect.

Question 5.2: Do you agree that Appendix 4 accurately describes all of the changes that should be made to licences to support Retail Code Consolidation?

Yes, we agree that appendix 4 accurately describes all of the changes that should be made to licences to support retail code consolidation.

Question 5.3: Are there any changes to licences that, if not made prior to the switching arrangements going live, would inhibit the delivery of the Switching Programme?

We believe that Ofgem are best places to make this assessment, but to give full effect to the switching arrangements, we would anticipate that all proposed changes, other than those which appear to be more minor terminology / housekeeping related, would be required to be made. As per the response to 5.1 above, the new drafting for policy positions such as cooling off and the switching backstop are critical to the implementation and operation of the new arrangements.

Question 5.4: Do you think that we should remove licence obligations on GTs described in SLC 31 and DNOs in SLC 18 to provide one or more of the following services:

- Enquiry services;**
- Maintenance of a register of data associated with a metering point/supply point; and**
- Customer enquiry service?**

We do not have a view on this and again believe that Ofgem are best placed to make this assessment.

END