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ICoSS Response to Retail Energy Code - part 2

The Industrial & Commercial Shippers & Suppliers (ICoSS) is the trade body representing the majority of the GB non-domestic energy market. Our members¹, who are all independent Suppliers, in total supply in excess of three quarters of the gas and half the electricity provided in the highly competitive non-domestic market.

Please note that we have already submitted a response to Questions 1.3-1.5, 4.3 &.4.4 on 29 July 2019.

Summary

Overall there are significant areas in these proposals where further detail will be required before the full impact can be properly assessed. Considering the significant impact these changes will have on industry parties and their ability to influence change in the future we expect that Ofgem seeks to fully engage with the industry when these proposals are expanded upon.

We support the creation of the Retail Energy Code in that it will help reduce the administrative burden on suppliers in the market. In addition, in our response we have made the following points:

- We welcome the consolidation of industry codes and processes where they do not change the current scope of obligations on parties.
- We note with concern proposals to extend certain new obligations to the non-domestic sector regarding, for example Erroneous Transfers, without any supporting evidence to justify doing so. Evidence we have gathered indicates these proposals are unwarranted and will simply add cost.
- Likewise we do not support the extension of the SMICoP to non-smart metering processes.





- The REC, like other industry codes, is fundamentally a contract between industry parties on how they shall interact in the market. Their interests and ability to manage their contract should not be marginalised at the expense of increasing non-party engagements that do not bear responsibility for the costs of raising change or enforcing sanctions.
- We understand the desire for the RECCo manager to take more of a lead in industry change management, but this should not restrict the ability for parties to raise changes if desired.
- The PAB should be comprised of industry experts who can understand the issues facing the market and develop appropriate solutions.

Section 1

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 broadly support the mission statement and the current licence objectives. Whilst innovation should not be restricted, it should not be promoted to the detriment of the efficient running of the REC, or to competition. This requirement should be seen in that light as a natural by-product of those two other objectives being and so having it as a separate objective is unnecessary.

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

We have a number of comments on the REC board.

Functions

With regard to the board functions we do not see the requirement for the board collectively to act as the representative of the consumer at the same time as having consumer representatives on the board. As the authority (who also has a duty to consider customer interests) will continue to have an active role in the governance of REC code changes this additional requirement on the board will result in confusion as to who the advocate for consumer issues will be. As there will also be consumer board representatives and oversight by the regulator, this should ensure consumer views are taken into account.

We agree that innovation itself should not be a board function.

Appointment

We agree with the concept of a nominations committee to appoint non-executive directors. ICoSS, with EUK, has successfully run the Xoserve Shipper director appointment process on a number of occasions; we suggest that this model could be followed again with a committee drawn from representative bodies. We would not support the board having the ability to influence the appointment of its own representatives as that would inevitably create conflicts of interest. In light of the



experience of the Xoserve board, with 3 out of 4 shipper nominated directors standing down at the same time, we agree that appointments should be staggered.

Accountability

Board members should be accountable to REC parties and there should be a clear mechanism for removing these board members where there is a breakdown in trust or the director is not fulfilling their functions. We look forward to seeing further details on how this should operate in practice, but any process must be effective and provide clarity to both REC parties and the directors themselves on how this can occur.

Process

Experience with the Xoserve board appointment process has demonstrated that there needs to be very clear written processes for how board members operate, are appointed and how they are removed. Careful consideration needs to be given as to how the intentions of Ofgem and the industry are delivered in this area. There are a number of ways in which this can be achieved but a binding ancillary document to the articles of association could provide the clarity needed.

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?

As this stage there is comparatively little detail provided on the composition of the REC Change Panel and how they will operate in practice, but we are concerned regarding the proposal that there are independent members with sufficient voting right to ensure decisions are not taken against the “consumer interest”. The vast majority of industry changes are either technical amendments to existing processes, changes to reflect policy changes by government or the regulator, changes to process obligations (timescale for submitting meter reads) or result in redistribution of costs between parties.

None of these changes result in consumer detriment and we are not aware of any industry changes that have been occurred that are against consumer interests; we would be interested to know what examples Ofgem has of such instances. In any event, as Change Panel decisions are only recommendations to the regulator for material changes, and Ofgem has the power to intervene should a change not be sent to them, we fail to see how “detrimental” consumer change could occur.

If independent members are to have the power to block change to address this theoretical risk, it implies either a veto or plurality of votes on the Change Panel. This removes the ability for those impacted by code development, industry parties, to have a say over changes to their own operations and increase the risk of legal escalation outside of the code. It also reduces the effectiveness of the panel to understand technical proposals, as most voting members will not be directly involved in the industry.



The Change Board should instead be composed of individuals with an ability to assess and progress change whilst understanding the challenges that the industry faces, i.e. drawn from existing industry parties.

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

Ensuring compliance with the REC requirements is essential if it is to allow an effective, competitive market to operate. We therefore support the concept of a Performance Assurance Board, which has the ability to ensure compliance with the REC provisions. We have a number of comments on the proposals regarding its composition and potential remedies.

Coverage

Its remit should cover all REC parties and we welcome the recognition that organisations other than suppliers should be directly overseen by the REC PAB, with the same level of scrutiny, and where appropriate penalty, being applied. In particular the activities of TPIs should be scrutinised.

Sanctions

Any performance must be proportionate to the risk that non-compliance will represent; in many cases technical breaches of the REC will occur with no detriment to consumers or the market. We would expect that the PAB takes this into account when determining priorities for oversight and any sanctions. Disproportionate application of sanctions for minor infractions is likely to result in “gold-plating” of processes by suppliers and other industry parties to avoid such penalties which will in the long-run will harm consumers.

Transition Period.

We agree with Ofgem that such an effective performance regime will take time and effort to be developed. It is doubtful however as to whether during the transitional period that the PAB can start to build such a regime as industry engagement with the REC will be limited whilst existing codes and processes remain. Until the new CSS service provider is fully in place, REC process will not be fully tested and the PAB will not be able to accurately identify priorities. Realistically the PAB cannot commence full operations until the REC is fully operational in mid-2021.

Appointment

We do not agree that the PAB should have a mix of industry and external parties. The failings of the gas PAB process has been due to the lack of industry-wide expertise of members, coupled with a lack of robust information on which the PAB can properly monitor the market. What is required is more knowledge of all aspects of the industry, not less. The REC is a technical document that primarily sets out how industry parties manage data in the market; we fail to see how customer advocates with no industry background will understand the processes or are able to gauge an appropriate industry performance standard against those processes. Any



expertise outside of the industry that is relevant to the PAB should be provided by the secretariat that supports the PAB. To that end we support an election process as currently used by the BSC and the UNC to make up the members of the PAB board.

Accountability

It is important that the PAB is seen to be effective, and that there is appropriate oversight. We agree that the RECCo board should be ultimately responsible for its actions.

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?

Access

We do not support the ability for parties who are not party to the code to raise changes that could potentially have a significant impact on the market. The REC is fundamentally a contract that creates a series of obligations and rights between signatories. Allowing parties that are not signatories to changes those rights and obligations places a significant risk on those signatories, whilst the proposer has no risk at all. It will also place pressure on the Change Manager to provide significant levels of support to a party with potentially little understanding of the market. This could result in a significant cost burden to the market.

Ofgem already has the power to raise changes it considers required under the SCR process, which it has exercised in the past. If a situation where a beneficial change to the code cannot be sponsored (though we are not aware of any specific situation where this has occurred), the regulator can intervene. As a result we are not supportive of the proposal for parties who are not signatories to the REC having the power to raise changes.

Development

We are generally supportive of the REC Manager being expected to provide the necessary expertise and support for a code change to be progressed (in line with our view that only code signatories may raise changes), including assessment of any system changes. We agree with Ofgem's view that it should have access to necessary expertise but believe that management of resources should be a contractual matter for the REC Manager, not a prescriptive requirement of the REC Change Management Schedule.

Development

We have serious concerns regarding the proposed scope and power that the REC Manager will have over industry changes.

We agree that the REC Manager can play a positive role in speeding up industry governance and improving the quality of the change management process. It should



not have the power to impede or restrict debate or development of industry change however; there may be times where the interests of the Code Manager may not align with the proposal, or that the view of the Code Manager and the proposer may not agree regarding the likely success of the change; the power of whether an industry change is proposed and how it is progressed should lie with the proposer. In addition, we also note that the Change Manager has discretion over whether to allow industry meetings to discuss any change; again these powers should rest with the proposer who may wish to solicit wider views from the industry.

The current process for raising and developing industry change should be preserved with the proposer having power over their own changes. We do not believe that proposals that are badly developed will realistically be implemented (as either the REC Panel or the authority will reject them), but removing the ability for code signatories to influence their own contract sets an unwelcome precedent in restricting the ability for code parties to influence their own contract.

Section 2

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?

We broadly agree with the proposals regarding transition to the REC from the existing codes, but note that there will be a period between now and the proposed transfer date of April 2021 where change management of existing codes will need to be appropriately handled.

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 support the proposals from Ofgem regarding the delivery process and welcomes its commitment to allow changes that do not directly impact the switching programme to continue to be considered and developed under existing change management processes.

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 note the lack of detail provided by the BSC regarding the changes they expect, which has prevented us from assessing the impact in that market. In addition the changes set out to the UNC are not clear owing to the overlapping and repetitive nature of the documents.



It has therefore not been possible to fully review all of the changes to the industry codes, but we have not identified any significant issues with regard to the changes proposed.

We do note that the iGT UNC is now directly referring to the UNC in many areas. It therefore seems appropriate at this time to commence work on fully incorporating the iGT UNC into the UNC, so further reducing the number of industry codes that industry parties have to engage with.

Section 3

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.

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.

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.

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.

From an initial review, the schedules seem to meet the required standards as set out in the consultation, though we have not completed a full end-to-end review of the processes and their interface with the technical specifications. We do note that many of the schedules lack details on when an activity can be undertaken, for example when a Domestic Premises Indicator should be set. This detail needs to be provided to prevent ambiguity and uncertainty on when certain processes should be undertaken. At this time we therefore cannot provide a definitive view on the impact these processes will have on the market.

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.

We agree that existing industry participants should not have to undertake Qualification to continue operating in the market. With regard to re-qualification, we would expect that suppliers (and transporters) would have a natural incentive to verify their systems against central processes if they deemed it necessary. The sanctions against an existing party if they fail re-accreditation seem limited; will an existing party be barred from industry central systems as a result?

It therefore seems unnecessary and unworkable to require re-qualification for every “Material Change”, which in many cases will be unwarranted. Instead we believe



that suppliers should have the option to require the REC Manager to undertake re-qualification where they believe it would be beneficial.

We note under 2.7 of the schedule, there is an expectation that Gas Suppliers shall utilise the DTN service. It is our belief that the faster switching programme is assuming that gas suppliers can utilise existing systems (i.e the IX) if they wish and that should be confirmed in the schedule drafting.

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?

We have no comments on the details of the draft schedule as we do not believe it is appropriate for them to apply to non-domestic customers (as set out below in our response to q3.8.). It is notable however that all of the processes described are highly prescriptive (setting out numbers of days for each step to occur in many cases) which seems to go against the concept of principles-based regulation. Such prescriptive requirements are likely to be very burdensome for suppliers and difficult to effectively police.

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?

We do not have any comments on the transposition of the Erroneous Transfers Customer Charter into the REC, but note that the current processes apply to domestic customers only and have done so for the last 15 years. We are unaware of any previous consultation by Ofgem to extend these obligations to the non-domestic sector and do not understand why this additional regulatory burden is appropriate for a market sector that will not see any change owing to the faster switching programme (as contractual notification periods will still be observed for non-domestic customers) and hence will not have an increased risk of switching failure. Please see our answer to q3.8 for further details as to why this extension is inappropriate.

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?

This consultation pre-supposes that the existing provisions should be extended to some or all non-domestic premises. We do not believe there is merit in doing either.



There is not currently a significant level of occurrence of these issues in the non-domestic market. A recent survey of ICoSS members indicates that the number of erroneous transfers that occurs annually for their customers is minimal; in many cases members reported no erroneous transfers in the last 12 months and the total reported was less than 50. The other issues identified above also do not occur in any great regularity. We note that Ofgem has been unable to provide any form of data on the scale of the problem regarding erroneous transfers or the other issues identified and we therefore assume that the low-level of occurrence will also apply to other non-domestic suppliers.

We would expect significant levels of such occurrences in any event. In contrast with the domestic sector where switches are done remotely using PCWs, switches in the non-domestic sector are done by telephone or face-face with a greater emphasis on accurate information being obtained by the supplier (or the broker), rather than the customer typing information off their bill, or the PCW using address data to ascertain the meter number. The longer timescales for a switch by a non-domestic customer also reduces the possibility of error.

Such provisions have not existed for the non-domestic sector since privatisation owing to the lack of problems and there is no significant market change in that sector to warrant this change. The benefits for the faster switching programme is limited to the domestic sector; contractual notification periods to suppliers will continue to apply and there is no “cooling-off” period for non-domestic contracts. There will not be an increase in non-domestic customer transfers and so no need to protect from a potential increase in such switching issues.

Extending unnecessary regulations to market sectors will result in additional costs for both the suppliers themselves and the REC service providers such as the PAB for little additional benefit. The current scope of this schedule should be limited to where it is needed; the domestic sector.

3.9: Do you agree with our proposal to introduce a harmonised 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.

Our members are not currently covered by the process describe but if imposed, it would simplify administration if a single escalation process is proscribed.

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.

We do not understand why this schedule ever covered non-domestic customers as such as a service is not provided for non-domestic customers and if a non-domestic site is found to have PPM then the meter is typically removed. In our view it is a



drafting error. In line with our comments above (q3.8) regarding proportional regulation it should refocussed onto the domestic sector.

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.

We not identified any issues with the current drafting.

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.

We have a number of concerns regarding the Data Access Schedule, with particular with regard to the treatment of gas industry data:

- The current proposals for access to data by non-UNC signatories will not be between the CDSP and the User, but between the Code Manager and the User. This prevents the CDSP from overseeing appropriate use of the data it manages.
- It is unclear who will be responsible for Protected Information (as defined in the UNC), the Shipper or the Gas Transporter. This creates ambiguity on how this data will be handled, particularly when suppliers provide updates via the REC schedule.

We expect that Ofgem takes these concerns into account when reviewing the Data Access Schedule, to make non-UNC parties directly accountable to the CDSP when accessing the service, and to provider clarity on ownership and control of Protected Information.

We welcome the inclusion of AMR service providers as parties who may access industry data as that will help improve the quality and reliability of AMR data in the market. Energy data is an important and valuable resource, which many organisations will wish to access (with customer consent) for the purposes of developing value added services to sell. As there is commercial value to this information we expect that any parties that seek to access it contribute towards the cost of providing it; otherwise energy customers will be cross-subsidising commercial ventures. We are also mindful of the potential data privacy concerns and would expect that the regulator should have some oversight of provision of data.

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

We have no comments in this area, but we are mindful of the fact that the energy industry is seeking to deliver significant system changes to a challenging timeframe though the Faster Switching programme. The subsequent lack of capacity in energy suppliers should be borne in mind when scoping any significant additional work programmes around data access.



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 understand the desire to remove the obligations from the energy network operators, contained in the respective licences, regarding provisions of enquiry services. These requirements were first implemented during privatisation so that such services were created to support the development of competition. It should be recognised that there is a mature market in place and so there is no longer the need for this procurement to be mandated.

Considering also that Ofgem has the ability to directly intervene in code arrangements we do not see why there should be replacement licence conditions imposed on suppliers and network operators. Instead the natural incentives on parties to have such a service should be relied upon. Drafting within the REC should be sufficient.

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?

We have no concerns with the RECCo having the ability to make such an appointment.

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.

We have no comments on the drafting of the Interpretations Schedule

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 have not identified any further areas at this early stage.

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?

Whilst we understand the desire for simplicity with regard to the code drafting, we are concerned that in some areas there is a lack of rigour with regard to the detailed drafting (for example see our response to question 3.1- 3.4). This has the potential to result in differing interpretations in the requirements on suppliers and so impair market operations. Instead a far greater level of prescription needs to be provided in the schedules.



Section 4

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

We have no comments on how Ofgem should seek to deliver its proposals.

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?

We agree with the scope of the SCR.

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

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

ICoSS members are not GDAA signatories and so the impact on our members from either option will be limited. It is important however that, if incorporated into the REC, that the governance of the GDAA is kept distinct from the rest of the REC and that the costs of the GDAA are recovered from the appropriate signatories.

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?

ICoSS is the custodian of the I&C Code of Practice and our members currently adhere to the RGMA baseline as a result. We support inclusion of the RGMA baseline into the REC, assuming that appropriate governance processes apply to its maintenance and development, so that non-domestic suppliers' interests are not marginalised.

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

We support the harmonisation of metering processes in the REC as that will improve transparency and visibility of the metering regime.

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

We support the incorporation of the metering CoPs into the REC as this will help improve visibility and improve industry control over these important framework documents.

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

There is a strong case for MEMs to be signatories to the REC and we support their inclusion. In many cases in the non-domestic sector customers contract directly with the MEM to provide metering services; if these parties are not MEM signatories then



the oversight of their activities is very limited. In addition having a direct link between MEMs and the processes that undertake will improve transparency and accountability regarding their compliance to the REC requirements.

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?

Changes to the metering schedules will impact suppliers to the same level as MEMs in many cases, so we believe it should go through the Change Panel rather than a separate MEM Panel, with a MEM representative attending for relevant changes. We agree with the funding proposals.

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

ICoSS was directly involved in the drafting of the SMICoP, the primary goal of which was to ensure that the initial Smart Metering installation was a positive experience for the customer, so avoiding negative publicity and promote the rollout as a whole. To extend it to activities outside of the initial installation will result in a significant extension of the SMICoP beyond what was deemed necessary and create additional costs and burden on the industry. Considering it will be for activities not considered to be critical at the time of the SMICoP's inception this will be for marginal benefit. We believe that the current scope of the SMICoP is fit for purpose and should not be extended.

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 stated in our answer above (Q4.12) the intention of the SMICoP was to address government concerns of negative experiences from the rollout programme reducing consumer support for Smart Meters. Extending its scope to any metering-related visit will simply increase costs and would require significant revision of the SMICoP, for the areas around marketing for example. The costs of this exercise outweighs the benefits and so we do not support any extension of scope of the SMICoP

When looking at specific market sectors, the intention of the SMICoP when developed was to cover both domestic and microbusiness customers Smart Metering Installations to promote the rollout programme. Non-domestic customers larger than microbusiness are considered to be able to engage with suppliers directly and so do not require the additional protections that the SMICoP provides, benefiting instead from a lower cost to serve. This initial view on the scope of the SMICoP is still valid and we would not support extension of the SMICoP to larger non-domestic customers.

Finally, non-SMETS2 meters can only be installed at large I&C and certain sites where no such Smart Metering solution exists, extending the requirements of the SMICoP to such sites will capture very few microbusiness customers (primarily



though with metering installations for which no SMETS2 solution is provided). It will also require a significant revision of the SMICoP to incorporate the differing metering arrangements. We therefore do not support the extension of SMICoP to microbusiness customers that will have non-SMETS2 installations,

4.14 – please note that there is no 4.14 in the consultation and assume this is a numbering error.

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

We support the proposals to regarding governance and assurance of the SMICoP provisions in the REC.

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

We have not answered this question as it applies only to the domestic sector.

Section 5

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?

We have only reviewed those changes that apply to non-domestic gas and electricity suppliers and gas shippers. We have no concerns over the drafting proposed.

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?

We have not had the opportunity to review the entirety of the gas and electricity supply licences and the gas shipper licences to determine whether all of the changes needed have been adequately proposed.

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 have not had the opportunity to review the entirety of the gas and electricity supply licences and the gas shipper licences to determine whether there are any such changes.

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 any concerns with the removal of these obligations from GTs on the proviso they are replicated in the REC. It would not be necessary to create corresponding obligations in the supplier licences and we would not support that.



Should you wish to discuss any aspect of this response please get in touch

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