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By email to: [switchingprogramme@ofgem.gov.uk](mailto:switchingprogramme@ofgem.gov.uk)

26 July 2019

Dear Rachel,

**Switching Programme and Retail Code Consolidation: Proposed Changes to Licences and Industry Codes**

Thank you for the opportunity to respond to your consultation in relation to the above<sup>1</sup>. This response relates to questions 1.3, 1.4, 1.5, 4.3 and 4.4 as requested. A further response to the remaining questions will be provided by the 9<sup>th</sup> September 2019 deadline.

For the purposes of ease of comparison with other respondents, we have structured our response around the questions as posed in your consultation document.

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

Yes, we support the development of a draft schedule to further define the REC Manager role and consider that the inclusion of this schedule within the REC will create a level of visibility for all REC parties.

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

In principle we support the scope of services as described, however we would welcome greater clarity on the details of each responsibility. For example, the suggested responsibility of “Party Management, Market Entry and Exit” presumably refers to management of the code accession process, rather than market lifecycle processes. We do not consider that the latter would be within the REC Manager’s role.

We expect that the development of a draft schedule as discussed under Question 1.3 will provide greater clarity.

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

We agree.

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

As SGN is not party to the MRA, we do not have a view.

**Question 4.4: Do you have concerns about the suitability of any of the options for the future governance of MPAS?**

As SGN is not party to the MPAS provisions, we do not have a view.

Should you require any further information with regards to our response then please do not hesitate to contact me at Hilary.Chapman@SGN.co.uk

Yours sincerely,

Hilary Chapman  
**Regulation and Codes Manager**  
**SGN**