



Ofgem

Submitted by email
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Dear Rachel,

[Consultation re. Retail Code Consolidation: SCR Scope, Process and Proposals & Switching Programme](#)

Please find our responses to questions for your first tranche consultation deadline. Please let me know if any further clarifications are required?

As a general observation, our main focus will be in the delivery of REC services which are fit for purpose, but are also delivered in the most efficient manner possible. Bearing in mind this is a code consolidation exercise, there will be an expectation in making overall savings. For new specialist functions such as assurance, we must ensure there is no overlap with similar services provided elsewhere such as those for the BSC. Irrespective of duplication and expertise requirements, there will be commonality in the provision of assurance services and efficiencies of operation are likely to obtain the best cost to serve on behalf of the consumer.

We hope our feedback is helpful.

Kind regards,

Victoria Burkett
Regulation Analyst – Industry Codes



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

We believe the current prescribed methodology is an appropriate starting point for the REC manager function, in anticipation of further amendment in view of experience. It is possible further prescription may be required, however the REC manager will need to be satisfied service providers proposals will deliver fit for purpose services. We need to ensure that delivery of the Performance Assurance functions across all industry codes is done so in the most efficient manner, to ensure there is no unnecessary duplication of assurance functions. The ambition should be to deliver assurance across all associated codes in the most efficient manner.

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

We believe the scope covers what would be required of the code manager however as noted in question 1.3, we feel that further prescription may be required to ensure the scope is also fit for purpose. The REC manager role will need to be flexible and dynamic to ensure it remains completely fit for purpose. We believe the REC manager role should be reviewed following feedback from the consultation to ensure it fits with requirements.

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

We agree with the current outline proposals however, like noted in previous questions, we believe that these are a good starting point and should be revisited and redeveloped prior to contracts being put in place.

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?

Whilst on the face of it one might suggest that MPAS governance should sit within the BSC to align the fuels, it must be recognised that the use and purpose of MPAS is different from that of UKLink. MPAS data is intrinsically linked to the meter point and changes to the data over the past decades has primarily been driven by changes to switching. Given that changes to MPAS are likely to be aligned to changes to CSS it seems sensible for efficient industry operation that changes to MPAS can be progressed for a single change process at the same time as any CSS changes and therefore we believe governance should sit within the REC.

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

We do not have any major concerns with the options detailed however, as noted in our response to Question 4.3, we believe the governance should sit within REC. We do however have some concerns regarding the alignment of some of the codes of practice and how this will fit within the current proposal. We will ensure our concerns are fully noted within the next tranche of questions.