

Switching Programme and Retail Code Consolidation: Proposed changes to licences and industry codes

Response due 9 September 2019

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 believe that the mission statement is clear and unambiguous and the objectives are concise and simple to understand.
1.2	Do you agree with our proposals on the initial and ongoing appointment of RECCo Board Members?	Yes, we consider that industry/constituent expertise is required but additional members with knowledge outside of the energy industry could bring the innovation and forward thinking desired. Extending the term of some of the RECCo interim board members, would bring continuity for the enduring board.
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?	We agree on the proposals for the set-up of the REC Change Panel where constituents are represented from industry as well as independent members.
1.7	Do you agree with our proposals on the set-up of the PAB? Do you foresee any problems with these proposals?	We agree with the proposals, however we believe the responsibility for the set-up of the PAB and its accountability should be separate to any REC Manager roles to ensure impartiality for oversight of the REC Manager’s activities and compliance.
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?	<p>We agree that the principles included in the Draft Change Management Schedule should address some of the existing problems with code governance, however there are some areas where we would seek further clarification.</p> <p>The process overview in Section 2.1 doesn’t match the process detailed, specifically that the Final Report shows that it goes directly to the Authority for a decision before being passed back to the Panel for a recommendation, and we believe that this should be the other way around.</p> <p>Under Section 4, Submitting Change Proposals, we are confused as to why there are two criteria for assessing change. We believe that a change</p>

	<p>should have both a business case AND better facilitate the REC Objectives in order to be accepted, regardless of whether it follows the Self- Governance or Authority determined path.</p> <p>Section 4.5 (d) states that the Code Manager can refuse to accept a change proposal on the grounds that it has no reasonable prospect of it being accepted. We feel that this needs to be expanded to explain how this would work and what criteria would have to be met for this to be the case.</p> <p>Section 10.2 (b) states that a summary of responses to the consultation will be submitted to the Panel, however we feel strongly that full responses should be included for the Panel to review. This is based on past experience where a summary of responses has meant that complete responses and views have been omitted.</p> <p>We have some concerns, again based on experience within other codes currently, that there is not a consideration for further consultation with industry in the event of a Change Proposal being amended. For example, after the Consultation has been issued and industry comments received, the Code Manager can make appropriate changes before submitting this revised version to the Panel to vote. We believe that the Panel should assess the revisions by the Code Manager and if they are significant, decide whether a consultation should be reissued for further industry assessment prior to vote.</p> <p>Section 11 refers to 'material change' however this is not capitalised and therefore presumably not a defined term. We would recommend that the term Material Change is defined clearly.</p> <p>Section 11.2 states the criteria that would require Authority approval, but there is no reference to Annex A which specifically states 'Matters reserved for Authority decision'.</p> <p>Section 12.1 states that the questions and answered during the meeting should form part of the meeting records, however we feel these</p>
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	<p>should also be included in the change documentation for ease of reference.</p> <p>Section 12.5 states that the vote of the REC Panel will be carried by simple majority vote. If members are voting party agnostic, i.e. purely on the business case/facilitation of REC Objectives then we agree with this method, although we feel this should be stated somewhere for clarity. If members are voting as a Party Representative we feel that until the construction of the REC Panel is confirmed we would be unable to confirm if this is suitable.</p> <p>We would like clarification as to what would happen if a discussion during the voting resulted in a change to the proposal that then resulted in a potentially rejected change being agreed or vice versa. This would be of particular interest if the member of the Panel is voting on behalf of their Party.</p> <p>Under Section 14.1 we think that it should be a requirement that when the Service Provider responds to confirm if the change will impact their systems, that at this point they should also confirm whether they would be able to meet the preliminary and detailed assessment timescales. This would save time as the Code Manager would know from the start, rather than potentially requesting an assessment at a later stage to be told that the timescales can't be met. This would also inform the timetable discussion with the Panel.</p> <p>Section 19.1 states the criteria that would require RECCo board approval, but there is no reference to the Articles of Association as mentioned within the consultation document.</p> <p>Finally we acknowledge that this is a draft and assume that there will be another review prior to final consultation to address the numerous typographical and grammatical issues throughout, examples including inconsistency between Paragraph and Rule; Working Days and Business Days, 8.1 having two 'e's etc.</p>
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Delivery Approach

2.1	<p>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?</p>	<p>We agree with the proposed choreography, as well as the switching programme changes being implemented into the REC as dormant until go live is attained.</p>
2.2	<p>Do you agree with the approach we have described for managing the delivery of the Switching Programme SCR and the Retail Code Consolidation SCR?</p>	<p>We agree with the approach described for managing the delivery of the Switching programme SCR and the Retail Code Consolidation SCR.</p>
2.3	<p>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?</p>	<p>We consider all consequential changes to industry codes have been captured.</p>

Switching Programme: REC Operational Arrangements

3.1	<p>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.</p>	<p>Concerns were raised in response to the October 2018 consultation that sections 14.6.1.2 and 14.6.2.2. mentioned the notification of deregistration in the Electricity Industry.</p> <p>We note that a new term ‘deactivation’ has been introduced into Section 14 and that ‘deactivation’ of an RMP is only possible where the RMP Lifecycle Status is Terminated – in other words the RMP has been disconnected.</p> <p>This does not address the concern that we raised in respect of a RMP that has been de-energised. Is the understanding that a de-energised RMP will retain an RMP Lifecycle Status of Active regardless of the Energisation Status?</p> <p>Section 14.6 refers to ‘deregistration’ and not ‘deactivation’ – the document needs to be consistent in the defined terms.</p>
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3.2	<p>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.</p>	<p>Paragraph 3.6 outlines that the CSS Provider will ‘take all reasonable steps to obtain the data on licence terms which permit the data to be shared’. The paragraph then continues that ‘the CSS Provider shall not be obliged to share data under this REC Schedule to the extent that the relevant licence terms do not permit the CSS Provider to share such data in such manner’. If, for example OS licence required that data could only be shared with other OS licence holders how would this be obligated? Does an obligation need to be added into the REC to ensure that parties who receive the REL address are also suitably licenced?</p> <p>Section 7 Manually Entered Address. Supplier is able to send CSS a message to change the address. CSS will consider the change and steps are recorded – 7.4.2 to 7.4.6 – if the address change is accepted. There are no process steps to advise the Supplier that the address change message has been rejected.</p> <p>We feel that 7.4.6 is unclear and should be amended to advise a Supplier of the decision whether the updated REL address was accepted or rejected.</p> <p>Section 8. Additional Meters added to the Communication Hub. DCC notifies CSS when a Smart Meter is joined to a Communication Hub.</p> <p>Given the issues we have encountered about when a Smart Meter is actually at a premise does there need to be a firm definition of ‘joined to a Communication Hub’?</p> <p>We have concerns about how the CSS will process multiple ESMES being held on one Communication Hub.</p>
3.3	<p>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.</p>	<p>We agree that the draft Data Management Schedule meets the required standards set out in the Regulatory Design Principles on the whole.</p> <p>However, Section 6.14(b) states that the Electricity Retail Data Agents shall update the RMP DCC Service Event Indicator and synchronise to the CSS Provider following a</p>

		<p>change to the DCC Service Flag received from the DCC. We would highlight that an issue has been raised under the MRA and SEC that the use of the DCC Service Flag has become unclear. DCC can only append an Active flag against an MPL, not a device.</p> <p>Once an Active flag has been set against an MPL the DCC are unable to change the status.</p>
3.4	<p>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.</p>	<p>We believe that on the whole the draft Service Management Schedule meets the required standards set out in the Regulatory Design Principles. We acknowledge that comments provided previously have been included, however, we still feel there are areas within the Service Management Schedule which require further clarification and/or additional review.</p> <p>Section 1.5(g) has removed the requirement for the Switching Service Management to provide KPI's to the REC Panel and instead, provide these to the PAB. Whilst we understand and agree that PAB will monitor KPI's we believe that the REC Board should be provided with information collated relating to KPI's. This will ensure that the REC Board will have early recognition and awareness should any KPI's fall below an expected standard.</p> <p>New paragraph 1.10 introduces the concept of a Switching Portal bulletin – any portal would need careful consideration to ensure that security of that portal is robust to enable secure and confidential transmission of any data.</p> <p>Section 1.11 states that the REC Board will review this Switching Service Management Schedule on at least an annual basis and take all reasonable steps to revise, replace or remove any issues that the REC Board identifies may inhibit the achievement of the Code Objectives. Again we understand and agree that the REC Board should review the Switching Service Management Schedule on a regular basis, however, we believe that any revisions, replacements or removal of any identified issues should be subject to a formal change process.</p> <p>2. Service Requests and Incidents.</p>

		<p>Within Section 1, paragraph 1.10 makes reference that information to be provided by or to the Code Manager or a Market Participant can be done, amongst other methods, via a Switching Portal bulletin. Within Section 2, on raising Service Requests and Incidents, a Market Participant who has the necessary access rights can raise these via the Switching Portal. Where the Switching Portal is unavailable and/or the Market Participant does not have the necessary access rights, the Market Participant may raise Service Requests and Incidents via email to the switching Service Desk using the templates provided by the Switching Operator. However, under 2.5 the first of the three tier support model to resolve incidents is 'knowledge articles' available via the Switching Portal for the Market Participant to try and resolve the incident themselves before raising a formal Incident. If a Market Participant does not have the necessary access or the Switching Portal is unavailable, these 'knowledge articles' will not be accessible. Provision should be made to make these 'knowledge articles' accessible to all Market Participants.</p> <p>Section 2.5(b) and (c) have been expanded to add further guidelines on how and when an incident can be closed. Whilst we agree with the additional narrative that has been added to ensure that an incident has been fully resolved before closing, we believe that there should be a provision to re-open a closed incident if the issue re-occurs or if it is subsequently found that the resolution has not fully addressed the incident.</p> <p>Major Incidents</p> <p>Section 2.8 states that if a Market Participant, Switching Data Service Provider or Switching Network Service Provider believes that a Major Incident has occurred, this should be raised via the Switching Portal and followed up with a telephone call, which we fully agree with. However it should also be stated that where the Service Portal is unavailable and/or the Market Participant does not have the necessary access rights, the Market Participant may raise a Major Incident via email to the Switching Service Desk using the templates provided by the Switching Operator and follow</p>
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		<p>up with a telephone call to ensure a timely response.</p> <p>Section 2.10 states that where the MIM has classified an issue as a Major Incident, the Switching Operator shall notify all Market Participants that are likely to be affected by the Major Incident. Our experience with the DCC for Smart Metering System related incidents is that the DCC are not always fully aware of which Market Participants would be affected by an incident. We strongly feel, therefore, that where the MIM has classified an issue as a Major Incident, the Switching Operator shall notify all Market Participants (regardless of whether the Switching Operator believes they are likely to be affected or not). It will then be up to the Market Participants to assess the Major Incident and decide whether it is affecting them or not.</p> <p>Section 2.11 Again we believe that the MIM should keep all Market Participants informed of progress (regardless of whether the MIM believes the MP is affected or not).</p> <p>Section 2.14 The Switching Operator shall report each Major Incident to the PAB. We believe that the Switching Operator should also report the raising of a Major Incident, its resolution and the subsequent review to the REC Board.</p> <p>2.15 - Where a Major Incident is not resolved within the required Service Levels, the Switching Operator shall inform PAB on a daily basis until the Major Incident has been resolved. Again we believe that a report should also be provided to the REC Board.</p> <p>Problem Management</p> <p>2.16 We believe that further expansion and clarity is provided where a Problem Record is created. The Switching Service Management Schedule will currently create a Problem Record where:</p> <ul style="list-style-type: none"> i. An incident has been raised which cannot be resolved and a workaround is implemented or ii. The same incident occurs frequently
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		<p>This enables the Switching Operator to monitor progress and implement a permanent solution.</p> <p>We believe that there is a third scenario where a Problem Record is being reported by multiple parties – this is different to the same incident occurring frequently as that could be experienced by one Market Participant as opposed to an incident being reported to be affecting multiple Market Participants.</p> <p>2.19 & 2.20. When an incident has been closed, the record of the incident and all actions taken should remain available to enable review of historical incidents. Where an incident has been closed and the incident re-occurs, the original incident should be re-opened so that there is a continuous audit trail and all the historical data regarding that incident should be made available.</p> <p>We note that neither Appendix A – Key Performance Indicators, nor Appendix B – Service Levels, were included in the Switching Service Management Schedule. However, we would take this opportunity to re-iterate our concerns that draft service levels in Appendix B are influenced by the number of maintenance slots we are experiencing with the DCC for the Smart Metering System. These are increasingly regular and impact on end users with substantial down time. We therefore believe this should be addressed within the CSS to provide clear guidelines to the Switching Operator that these should be kept to a minimum – with targets and penalties if these are not adhered to. Any subsequent requests by the Switching Operator to amend these maintenance slots should be impact assessed by the wider industry and consideration should be given to the opinions of the end user.</p> <p>We also feel that any performance measures used for the Service Levels, need to consider the real world service experienced by the user.</p>
3.5	<p>Do you agree that the draft Entry Assessment and Qualification Schedule meets the required standards set out in the Regulatory Design Principles? If not,</p>	<p>The draft Entry Assessment and Qualification Schedule meets the required standards set out in the Regulatory Design Principles, however, we feel that further clarity is required in respect of the following:</p>

	<p>please describe how you think it should be improved.</p>	<p>Section 2.24 Should the Code Manager also advise the REC Board of a decision regarding an applicant’s qualification or requalification status?</p> <p>Section 3.1 requires re-qualification’before it makes a Material Change’. We feel that there should be a firm definition of ‘Material Change’ in respect of a re-qualification trigger.</p> <p>In addition, clarity is required for this Section 3.1 to make it clear that requalification is required before the change goes in to the <u>live</u> environment.</p>
3.6	<p>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?</p>	<p>Section D Crossed Meters We note that the consultation acknowledges that as a result of the MRA and SPAA SCWG new solutions for the secure transfer of personal data is being developed. It should also be noted that a new MAP has been drafted. The new draft MAP states that in addition to a crossed meter affecting more than one premise a crossed meter will also affect more than one Supplier. Where this is not the case, this is not a crossed meter. We feel that this conditions precedent should be included with the draft Resolution of Consumer Facing Switching and Billing Problems Schedule to ensure complete clarity.</p> <p>Resolution Process 16.1 The resolution process would not involve the Supplier contacting the Distribution Network Operator.</p> <p>16.7 We do not agree with this clause. The Electricity Retail Data Agent is only able to report an issue with a meter at a MPL which they suspect may be a cross meter to a Supplier. The obligation is on the Supplier to trigger the cross meter process. The Interface Timetable for Crossed Meters supports this.</p>
3.7	<p>Do you agree that we have adequately captured the requirements of the ETCC within the draft Resolution of Consumer Facing Switching and Billing Problems</p>	<p>We believe that Suppliers are better placed to provide a response to this question.</p>

	Schedule, taking account of the existence of Guaranteed Standards of Performance that cover engagement with the consumer and resolution of erroneous transfers?	
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?	<p>Yes, we believe that 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.</p> <p>We believe that for Switch Meter Read Problems, the scope should be extended to cover domestic and micro-business consumers who are settled on a HH basis.</p> <p>We see no merit in operating a two tier system under the REC.</p>
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.	<p>We agree with the proposal to introduce a harmonised procedure for escalating delayed and disputed problem resolutions to ensure that consumers are not unduly disadvantaged and that a positive outcome is achieved in a timely manner.</p>
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.	<p>We believe that Suppliers are better placed to provide a response to this question.</p>
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.	<p>Section 1.5. We do not agree that all subsequent registrations for each related Metering Point should have the same Supply Effective From Date and Supply Effective Through Date. There could be a scenario where there is a related MPAN relationship between more than one meter at a premise and a further meter is added to that premise and existing related meters or, a meter could be removed leaving a related MPAN relationship between more than one meter still current.</p>

3.12	<p>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.</p>	<p>Section 6.6 The Data Access Principles have not yet been defined within the Interpretation Schedule.</p> <p>We believe that it needs to ensure that all parties who use the Enquiry Service are audited on an annual basis to ensure that there is timely removal of any user access who is no longer associated with that party.</p> <p>Will there be any thresholds set on use and accessing data through the Enquiry Service?</p>
3.13	<p>What changes would you make to best align the draft Data Access Schedule to the Energy Data Task Force recommendations?</p>	<p>We believe that draft Data Access Schedule builds on the current foundations which has made data available on a secure and more accessible platform. The draft Data Access Schedule does align with the Energy Data Task Force recommendations and principles.</p>
3.14	<p>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?</p>	<p>The Enquiry Service provides information which will assist with the switching of consumers, therefore RECCo should be responsible for procuring the enquiry services. If RECCo are responsible the obligations should be removed in the Electricity Distribution Licence. We cannot comment on the Gas Transporter licence.</p>
3.15	<p>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?</p>	<p>Yes we 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.</p>
3.16	<p>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.</p>	<p>Yes we agree that the draft Interpretations Schedule meets the required standards set out in the Regulatory Design Principles.</p>
3.17	<p>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?</p>	<p>We are unable to provide an opinion in response to this question as we have not had an opportunity to review what will be included in the Technical Specification.</p>

3.18	<p>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?</p>	<p>We feel it prudent that a further separate consultation on purely the schedules is undertaken once all responses to this current consultation have been assessed and the schedules have been amended. It would be helpful if this further separate consultation included the Technical Specification. It would also be helpful if when further consultations are issued that the documents include tracked changes.</p>
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Retail Code Consolidation: SCR Scope, Process and Proposals

4.1	<p>Do you agree that Ofgem should lead an end-to-end process to develop the code modifications to deliver retail code consolidation?</p>	<p>We agree that Ofgem should lead an end to end SCR process to develop the code modifications to deliver retail code consolidation. It will avoid any fragmentation by providing a complete and coherent overview. It will also ensure that all necessary changes are managed in such a way that implementation dates are aligned as necessary.</p>
4.2	<p>Do you agree with the proposed scope of the Retail Code Consolidation SCR? Do you think any additional areas should be in scope?</p>	<p>We agree with the proposed scope of the Retail Code Consolidation SCR.</p>
4.5	<p>Do you agree that the GDAA and Green Deal related provisions in the MRA should transfer to the REC?</p>	<p>Although it is the more ambitious option, we believe that all Green Deal related provisions should be transferred to the REC. We understand that due to the closure of the MRA the provisions that are currently under the MRA will transfer to the REC, but to avoid a continued fragmented approach, we feel that all Green Deal provisions should be transferred to the REC.</p>
4.6	<p>Do you think GDAA parties should accede to the REC, or be engaged in governance through some other means?</p>	<p>Electricity Suppliers will already accede to the REC and therefore we believe that this is also appropriate for finance parties and Green Deal providers. We believe that by them acceding to the REC it will ensure a consistent approach to Performance Assurance and change, and the GDAA as a retail code, should sit in its entirety in the REC.</p>

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?	We believe that Gas parties are better placed to provide a response to this question.
4.8	Do you agree with our preferred option for governance of agent appointments and MDD, outlined as option 3 above?	Whilst we understand the reasons for wanting to move the electricity provisions for MEM appointment and MAP notifications along with relevant metering MDD into the REC, we feel that further clarification is required. How will this work in practice? Will there be two MDD publications and releases?
4.9	Do you support our proposal for consolidating the metering CoPs into the REC?	We support the proposal for consolidating the metering CoPs into the REC. We believe that there will need to be appropriate representation where required to ensure the correct knowledge is available to provide relevant expertise.
4.10	Do you think MEMs should be parties to the REC?	We believe that MEMs should be parties to the REC as this would ensure direct obligations and performance assurance could be placed on them.
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?	We believe that changes to the Metering Schedule(s) of the REC should follow a consistent approach and be progressed through the REC Change Panel only. This is subject to the REC Change Panel having appropriate representation and technical knowledge from MEM representative(s) where appropriate.
4.12	Which of the requirements within SMICoP, if any, should extend beyond the initial installation of the smart metering system?	We believe that this question relates to point 4.81 and therefore it is for suppliers to provide a response.
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?	We feel that suppliers would be better positioned to make comment on what requirements within SMICoP, if any, should apply to the installation of non-smart metering systems. However, we do believe that consumers should receive a consistent service irrespective of whether they have a Smart Meter or a non-smart meter and therefore any obligations or requirements should be in the REC and should be consistent.

4.14	NOT USED	
4.15	What are your views on our proposals for the governance and assurance of the SMICoP provisions once migrated to the REC?	We agree with the proposal that the governance should follow the standard REC procedures and that PAB should have the ability to determine assurance methods, providing that there is appropriate technical representation and knowledge input.
4.16	Do you agree with our proposal for incorporating PSR provisions in the REC?	We agree that the PSR provisions should be incorporated into the REC. This will help ensure harmonisation across gas and electricity and help facilitate cross-sector data sharing. As the DTC is transferring to the REC it would seem sensible that the PSR is incorporated alongside this.

Licence Condition Changes

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 considered the DNO tab, and on the whole are in agreement, subject to our comment in 5.2.
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 only considered the DNO tab and although we mostly agree, we question whether the REC should be added to SLC 20.3 and SLC 20.10 where Master Registration Agreement has been removed.
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 only considered changes to the DNO licence and we cannot see any changes that, if not made prior to the switching arrangements going live, would inhibit the delivery of the Switching Programme.
5.4	<p>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:</p> <ul style="list-style-type: none"> • Enquiry services; • Maintenance of a register of data associated with a metering point/supply point; and • Customer enquiry service? 	<p>We do not feel it is our place to comment on the Gas licence obligations.</p> <p>With regards to SLC 18 for DNOs, we agree that the licence condition can be removed as long as the obligations for the enquiry service, maintenance of a register of data associated with a metering point/supply point and the customer enquiry service are all fully detailed within a relevant code.</p>

		<p>We wish to highlight Sections 18.4 to 18.9 inclusively regarding Charging Statements, to ensure that if these obligations are removed from the licence that they are covered in another industry code.</p>
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