



Independent Networks
Association

Rachel Clarke
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

23rd February 2021

Consultation for the Retail Energy Code – proposals for version 2

By e-mail only

Dear Rachel,

I am writing on behalf of the Independent Networks Association (INA). The INA represents and consists of the UK's leading independent utility network owners and operators who serve the domestic and commercial and industrial sectors across the UK.

Thank you for the opportunity to respond to this consultation detailing proposals for version 2 of the Retail Energy Code (REC). All our members are fully supportive of the initiative to rationalise the industry codes into the REC and appreciate the benefits this offers to all parties and industry stakeholders.

Whilst we are generally supportive of the proposed governance arrangements, we would like to raise concerns over the proposed engagement with the independents in the code change process in the future. Some aspects of the proposed new REC governance would appear to reduce our members ability to engage which may create commercial and operational risk for our members (e.g., the closure of IREG). However, we do acknowledge that the details of the future change arrangements are not yet fully defined. We therefore look forward to working with the new REC Code Manager in the development of the change process to ensure that it is fair, transparent and allows our members to engage.

The proposed approach for the transition from the MRA, SPAA and other codes to the REC seems reasonable. We note that the intention at this stage has been to consolidate the codes without implementing any significant change.

Following the review of all the proposed schedules we have updated and attached the consultation response template provided to highlight any potential risks or minor concerns for your consideration. Reassurance is sought regarding the following 2 areas:

1. Metering Operations schedule - It is our understanding that all current arrangements in place relating to RGMA are still applicable, can you confirm if this is the case?
2. REC Transition Schedule - Confirmation is required as to the period any test environments need to be maintained given the cost implications associated with the maintenance of the systems. All parties have currently provisioned their environments for the course of each required test phase however post completion and approval of the related milestones, the systems would be decommissioned. Can you confirm whether there is a requirement to maintain these environments any longer during transition or post go live?



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It has also been highlighted that references to IT applications, services and role names are introducing additional complexity with the introduction of more names and acronyms and would encourage you to use the implementation of the REC as an opportunity to harmonise and rationalise terminology across the industry.

Finally, concerns have also been raised that the proposed single code change control process may not effectively influence the speed and outcome of cross code changes and would urge caution to ensure consequential change is identified early to avoid scenarios that have been endured previously whereby negative impacts had not been pinpointed.

Following our recent discussion with Andrew Amato regarding the Plot to Postal Data Cleanse activities and wider Data Working Group, we would also like to raise concerns relating to the Address Management schedule which is due to be published in the next version of the REC. Whilst Improvements have been noted across all parties, our members continue to report challenges when seeking support from Suppliers to cleanse address data. It has been noted that Suppliers currently have an obligation to support data cleanse activities of this nature and therefore we urge you to consider how to make all parties obligations under this schedule more explicit and robust to support the ongoing improvement targets that need to be achieved.

We look forward to reviewing the decisions and further developments made in this space. Our members are keen to engage with the REC to ensure that the transition of the REC into the standard industry code framework is smooth and efficient.

Yours sincerely,

Vicky Bell

Chair to the Independent Networks Association Regulations Sub-Committee

Encl.