

Rachel Clark
Switching Programme
Ofgem
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LONDON
E14 4PU

By email only to: switchingprogramme@ofgem.gov.uk

23 February 2021

Dear Rachel

Retail Energy Code V2.0 Retail Code Consolidation

Thank you for the opportunity to respond to the above consultation. This response is on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc; London Power Networks plc; and South Eastern Power Networks plc. We are Great Britain's largest electricity Distribution Network Operator (DNO), dedicated to delivering a safe, secure and sustainable electricity supply to 8.3 million homes and businesses.

I can confirm that we remain fully supportive of Ofgem's principles to deliver the Retail Code Consolidation alongside the Central Switching Service that will build on customer confidence, facilitate competition and deliver 'better' outcomes for all customers.

In the Appendix we have provided answers to questions relevant to UK Power Networks. I hope that you will find this information helpful. If I can assist further, please do not hesitate to contact Hazel Cotman (hazel.cotman@ukpowernetworks.co.uk) in the first instance.

Yours sincerely



James Hope
Head of Regulation & Regulatory Finance
UK Power Networks

Copy: Paul Measday, Regulatory Returns & Compliance Manager, UK Power Networks
Hazel Cotman, Industry Engagement Lead, UK Power Networks



Appendix:

Question 2.1: Do you agree with our proposed approach to information security and data protection assessment under the REC? In particular, do you agree with the requirement for all REC Service Users to notify the Code Manager of a security breach?

UK Power Networks agrees with the proposed approach to information security and data protection and is therefore supportive of the new requirement for REC Service Users to notify the Code Manager in the event of a security breach. However we believe that there should be a materiality clause built in to ensure the process is efficient.

Question 2.7: Do you agree with the principle that a consumer should be no worse off by virtue of a theft investigation being undertaken by a network company rather than a supplier?

UK Power Networks is minded to agree with the over-arching principle but sees some issues and potential conflicts in obligations.

Most particular amongst these would be a Distributor's obligation pursuant to Licence Condition 49 to recover the value of unbilled electricity taken; this is not punitive in nature but seeks to ensure that the occupier is not left better off than their regular bill-paying neighbours. UK Power Networks would be concerned if 12 months became the *de facto* limit and believe this would be in contradiction to the delivery of our Licence Obligation as recovery of unbilled electricity under theft investigation cases may cover a number of years.

Furthermore we seek additional information on how an assessment of a customer being no worse off will be made.

Question 2.10: What risks (if any) do you foresee in the transfer of processes associated with Commissioning, Complex Sites, Proving and Faults from BSCP514 to the REC Metering Operations schedule?

We believe that without allowing adequate central planning for consequential changes to industry codes affecting numerous parities, there is a risk that data will not be transmitted and critical information will not therefore be shared. This risks creating non-compliances and potentially impacting Settlement.