

Rachel Clark
Programme Director
Ofgem
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E14 4PU

16th November 2020

Dear Rachel,

Re: Retail Energy Code Consultation - The Retail Energy Code - proposals for version 1.1

Thank you for the opportunity to respond to Ofgem's latest Switching Programme consultation.

We welcome the further clarity that is detailed within the consultation document, particularly around the change processes. In principle we support the approach set out within this consultation. In particular, we welcome the proposal to have distinct change categories; but, we would appreciate further clarity that will be afforded by the detailed development of the change process.

We also note, and in principle support, the proposal to define and establish change processes in readiness for REC V2.0. We see that this will help mitigate the risk of industry change debt and an implementation lag following implementation of V2.0 of the REC; however, remain concerned regarding the industry capacity to implement change in the run up to, and also after, Faster Switching Go Live. We request that consideration is given to the impact of such proposals given significant industry change capability focus currently being upon the Faster Switching Programme. This will not necessarily stop at implementation due to change debt from the programme itself, from individual organisations and other Codes.

We note the principles with respect to Performance Assurance and generally support the proposed inclusion of organisations undertaking activity under the REC. We note the relatively recent appointment of the Code Manager, and until the next level of documentation is made available it is not possible to fully assess the proposals.

We also take this opportunity to highlight that we continue to engage separately with the programme regarding comments we have made with respect to the Main Body, the Qualification and Maintenance Schedule and the Data Access Schedule and therefore our response on these documents are not included within this response. We think that this is an area of significant importance to ensure that the release of data is managed in a transparent, efficient and effective manner whilst establishing and observing correct protocols around data ownership.

The latest set of documents provide further insight into the proposed framework and operation of the REC. We are largely supportive of these proposals but would welcome the clarity that will be available from the further development of these Schedules. We have collated some detailed comments against these schedules and will pass these back separately. We hope that you also find the detailed comments helpful. We remain committed to supporting the development of the REC and look forward to working with the programme as necessary and via the User Group.

Annex 1 contains our responses to the consultation questions which are pertinent to our current role as the gas industry Central Data Services Provider (CDSP) and our future roles as envisaged by the REC proposals.



We look forward to continuing to work with Ofgem, our customers and the wider industry to deliver a successful Switching Programme. In the meantime, if you wish to discuss further any aspect of our response, please do not hesitate to contact me. We are happy for you to publish this response in full.

Yours Sincerely

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Annex 1 – Responses to Consultation Questions

Naturally given our role as the gas industry Central Data Services Provider (CDSP) and our future roles as envisaged by the REC proposals we are most focussed within the consultation subject areas upon the Change Processes, so we offer responses particularly in this area:

Q 4.1: Do you support our proposals regarding the production of preliminary and detailed IA?

We support principles that create an effective and efficient process that enables the industry to perform impact assessment of change, in-line with proportionate governance. It is essential that a proper framework is established to determine when a further detailed impact assessment is required. The schedule itself is not clear whether a detailed assessment is necessary for all change in advance of approval of a Final Change Report. We acknowledge that there will be instances where a greater level of granularity of impact assessment – such as in instances where a business case assessment is marginal – will be necessary. We would also recommend that there is a wider triage, prioritisation and assessment of industry change pipelines that helps inform Code Manager requests for Impact Assessments, in particular where a Service Provider indicates that specific IA timescales are challenging.

Q 4.3: Do you agree that the REC should encourage shorter and more frequent Change Panels, to be held remotely where possible?

We support the proposal regarding remote meetings. The pandemic has demonstrated that industry meetings can be conducted effectively and with greater and more diverse participation where all parties are joining remotely. This should be the norm, but some face to face meetings should be convened.

We value the importance of clear scheduling of meetings that integrates effectively with the existing industry timetables to ensure that focus and attendance is maintained.

Consideration should be given to allow sufficient time between meetings for progression of the change, and for participants to prepare for meetings.

Q 4.4: Do you agree with the proposed categorisation of REC documents and associated change paths?

We would welcome more detail proposed regarding the categorisation of change to comment in detail. We support the principle of separation of regulatory change from technical documentation change. It is unclear to the extent that the change process will vary depending on the type of change, and how these processes would interact. We remain committed to ensuring cost effective and efficient development of change and it is essential that this ensures that effort is incurred at an appropriate point within the change lifecycle to make it meaningful and worthwhile.

We would welcome further clarity when Authority direction is expected. Our observations on the drafting are provided in the detailed review comments.

Q 4.5 Do you agree that code administrators and managers should be able to raise any changes identified as necessary by the CCSG?

We have no issues with this recommendation. Our understanding was that raising of a change is not restricted to Parties so such parties have not been precluded from doing so.