

GDAA Panel Secretary
On behalf of the GDAA Panel
Gemserv Ltd
8 Fenchurch Place, London, EC3M 4AJ
GDAAPanelSecretary@gemserv.com

To:
Rachel Clark,
Switching Programme
switchingprogramme@ofgem.gov.uk

23rd February 2021

Re: Retail Energy Code v2.0 and Retail Code Consolidation

Dear Ms Clark,

The Green Deal Arrangements Agreement (GDAA) Panel welcomes the opportunity to respond to the above consultation and in particular those areas that focus on future governance of Green Deal.

The GDAA Panel support Ofgem's aim of efficient and effective Green Deal Governance through integration into the Retail Energy Code (REC). The Panel also notes that the changes specified to the Green Deal Schedule support the like-for-like transitions of provisions into the REC. The Panel have focussed on those changes and related provisions that were specified in the consultation document, and comments on these specified changes and related provisions are laid out below.

The GDAA Panel note that their response relates to the provisions for governance, but have not commented where we feel it is more relevant for individual parties to the GDAA to respond. All parties to the GDAA have been encouraged to review the consultation and submit their own responses as well.

The Panel also wish to highlight that it would be good to better understand the falling away of GDAA obligations and how they will be subsequently picked up under implementation of the REC. The Panel also believes that further legal review may be warranted to ensure the overall transition is appropriate, and better understand any need for clauses under the GDAA to remain enduring after transition. Similarly, the GDAA Panel and Green Deal Expert Group (GDEG) are working to resolve outstanding legacy issues which will be highlighted to the REC Code Manager and Transition Manager in upcoming workshops.

The GDAA Panel support the proposed changes in the Retail Energy Code v2.0 which keep closely to the current GDAA to ensure that there is minimal disruption to the Scheme.

If you would like to discuss our response further, please contact the GDAA Panel Secretary (Gemserv) at GDAAPanelSecretary@gemserv.com.

Yours sincerely,

The GDAA Panel.

Green Deal Arrangements Schedule: PART B – Green Deal Users

The GDA Panel welcomes alignment of participant types to the current GDA by removing 'Gas Suppliers', 'Energy Efficiency Helpline' and 'Green Deal Cashback Representatives'. These REC Party types are currently eligible GDCC Users, and removal will require system changes. However, despite these types being initially allowed in order to facilitate expansion of the scheme, no access was ever requested from Gas Suppliers. The Energy Efficiency Helpline category was designed to allow the Energy Saving Advice Service (ESAS) to provide information on Supplier and Provider affiliation to GD Plans, however the delivery of provision of independent advice was replaced with the Simple Energy Advice website, and no access to the GDCC has been requested. Similarly, no further versions of the Green Deal Cashback scheme are anticipated, and no users of this type were set up on the GDCC. The Panel's opinion is therefore that the amendment is appropriate as it is not expected that additional Party types will be required. The GDA Panel note that the Green Deal Users Table from the Green Deal Central Charge Database Service definition Schedule references should read as 2.2(a) and 2.2(b).

Green Deal Arrangements Schedule: PART D – Green Deal Charges and Quarterly Payments

The GDA Panel support the change to simplify the procedure of Green Deal Quarterly Payments to offset Retail Energy Code Company (RECCo) costs for Suppliers. This solution is scalable based on the schemes activity and it is not envisioned by the GDA Panel that this change will raise any particular issues for Green Deal Suppliers.

Green Deal Arrangements Schedule: PART E Performance Assurance

The GDA Panel notes that the Supplier Performance Levels are identical to the levels set out in the GDA (Schedule 7). The GDA Panel agree with assigning determination of appropriate compensation levels to the Performance Assurance Board, and do not anticipate that this will cause disruption to the Green Deal Scheme.

Green Deal Arrangements Schedule: PART B – Green Deal Users

The GDA Panel believe that allowing the Performance Assurance Board to consider appeals raised against onboarding decisions is appropriate, and should cause no disruption to the Green Deal Scheme. The Panel note that the onboarding requirements in the Qualifications and Maintenance Schedule to the REC and the Green Deal Arrangements Schedule remain the same as the requirements under the GDA. It was also noted that the appeals process replicates that within the current GDA, with final appeals being made to court or to the Secretary of State for The Department of Business, Energy and Industrial Strategy.