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| Action | For Decision |

Switching Programme Consequential Changes

This paper provides details of SPAA changes required as a result of the Switching Significant Code Review (SCR) for approval.

1. Summary

- 1.1 On 15 October 2018, Ofgem published its latest Switching Programme Regulation and Governance consultation document¹. Draft REC V2 Schedules were included as Annexes to this consultation, including several REC Schedules reflecting information currently included within the SPAA.
- 1.2 The consultation document also re-iterated Ofgem's view regarding REC V3, stating that this will incorporate the remaining provisions from the MRA and the SPAA, providing a significant opportunity for code consolidation and rationalisation. REC V2 and V3 separate those provisions which are to be given effect through the Switching Significant Code Review (SCR) (REC V2) and those which continue to sit outside of the scope of the programme and must therefore be implemented through alternative means (REC V3). Ofgem intends to progress the development and, to the extent possible, the subsequent implementation of both of these packages at the same time.
- 1.3 The consultation included a request that proposed Switching SCR drafting be provided to Ofgem by the end of March 2019. As Ofgem plan to implement the Switching SCR at the same time as the closure of SPAA and MRA it is possible that the proposed SPAA Switching SCR drafting will not be implemented within SPAA, as V3 provisions will migrate to REC instead. However, the SPAA SCR drafting has been developed on the basis that there will be a gap between V2 and V3 so minimise any risk associated with a delay to REC V3. Changes highlighted through the Switching SCR drafting will be fed into the subsequent REC drafting.

¹ [Switching Programme: Regulation and Governance - way forward and statutory consultation on licence modifications](#)

- 1.4 At its December meeting, the SPAA EC agreed that draft text should be legally reviewed and provided to the February SPAA EC meeting for approval. This text will then be sent to Ofgem for inclusion in the Switching SCR.
- 1.5 Appendix 1 shows each SPAA Schedule and identifies whether its contents become redundant with the closure of SPAA, will be migrated as part of the Switching (REC V2) SCR or the Code Consolidation (REC V3) SCR.

2. REC V2 SCR Changes

- 2.1 The Switching SCR should incorporate consequential changes to existing industry codes as a result of the new switching arrangements. From a SPAA perspective, the majority of Switching SCR changes will result from the migration of provisions from SPAA to the REC, with SPAA Schedules being classified as 'Not Used'. However, the switching arrangements may result in changes to SPAA Schedules which are not expected to migrate into REC V2. These changes have been highlighted separately to ensure they are not missed when the bulk of the provisions migrate as part of the REC V3 SCR.
- 2.2 Attachment 1 provides details of proposed SCR changes. In summary this includes:
 - Amendments to definitions relating to provisions in REC V3 Schedules – definitions to be amended to reflect the new terminology.
 - Minor changes to the RGMA Baseline document to reflect the new end to end switch process – redlined drafting has been reviewed and agreed by the RGMA Faster Switching Review Group – see separate closure report for further information.
 - Minor changes to the Main Body to amend definitions and clarify data protection requirements.
 - Minor changes to other Schedules to reflect the change from Change of Supplier to Switch.
- 2.3 When the proposed SCR changes were discussed in December 2018 it was suggested that changes to Schedule 18, Schedule 23 and Schedule 24 may be required. The latest position regarding these Schedules has been detailed below:
 - Changes to Schedule 18 'Market Domain Data' to remove the management of Market Participant Data. The migration of Market Participant Data from SPAA to the UNC is being progressed outside the Switching SCR – see separate closure report for further information. Therefore, no further change is required as part of the Switching SCR.
 - Changes to Schedule 23 'Provision and Utilisation of DES and other supply point information services' may be required if the provisions are not fully migrated as part of the REC V2 SCR. The latest position is that the provisions in SPAA Schedule 23 will be fully migrated as part of the Switching SCR. Therefore the assumption has been made that this Schedule will be marked as not in use.
 - Changes to Schedule 24 'Publication of Operational and Escalation Contact Information' to remove the requirements to provide contacts relating to provisions that are migrating to the REC. SCP 429 'Arrangements for the Maintenance of Operation Contacts' has been approved which removes specific operation contacts from Schedule 24. Therefore, no further change is required as part of the Switching SCR.
- 2.4 Proposed SCR changes have been legally review by Gowlings.

3. Recommendation

3.1 The SPAA EC is invited to:

- NOTE the contents of the paper; and
- AGREE the Switching SCR changes included in Attachment 1 should be provided to Ofgem.

4. Appendices

- Appendix 1 – Table of Schedules

5. Attachments

- Attachment 1 – SCR Changes

Sarah Jones

Appendix 1 Tables of Schedules

| Schedule | Title | Scope of the REC | Phase |
|-------------|---|---|--------|
| Schedule 1 | Parties | This is not directly impacted by the REC, though there would be a duplicate Schedule for this area. | N/A |
| Schedule 2 | Accession Agreement | This is not directly impacted by the REC, though there would be a duplicate Schedule for this area. | N/A |
| Schedule 3 | Self - Certification | This is not directly impacted by the REC, though there would be a duplicate Schedule for this area. | N/A |
| Schedule 4 | SPAA Limited | This is not directly impacted by the REC, though there would be a similar Schedule in REC for RECCo Ltd. | N/A |
| Schedule 5 | - | Redundant Schedule. | N/A |
| Schedule 6 | SPAA Products | <p>This includes a list of SPAA Products as follows:</p> <ul style="list-style-type: none"> • MAMCoP • AMICoP • RGMA Baseline • Supplier Data Flow Catalogue <p>This Schedule will not be migrated to the REC, however the products may be migrated as part of the future phases.</p> | N/A |
| Schedule 7 | - | Redundant Schedule | N/A |
| Schedule 8 | Process for Customer requested Objections | Provisions transferred to the REC | REC V2 |
| Schedule 9 | Process for the assignment of debt in relation to PPM | Provisions transferred to the REC | REC V2 |
| Schedule 10 | Procedure for Resolution of erroneous transfers | Provisions transferred to the REC | REC V2 |
| Schedule 11 | The Procedure for Agreement of change of Supplier Reading and the resolution of | Provisions transferred to the REC | REC V2 |

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| | disputed change of supplier readings. | | |
| Schedule 12 | - | Redundant Schedule | N/A |
| Schedule 13 | - | Redundant Schedule | N/A |
| Schedule 14 | - | Redundant Schedule. | N/A |
| Schedule 15 | - | Redundant Schedule. | N/A |
| Schedule 16 | - | Redundant Schedule. | N/A |
| Schedule 17 | - | Redundant Schedule. | N/A |
| Schedule 18 | Market Domain Data | Working Group established to amend provisions to reflect migration of the management of Market Participant data to the UNC. Remaining provisions to be migrated in REC V3 | REC V3 |
| Schedule 19 | - | Redundant Schedule. | N/A |
| Schedule 20 | NOSI | Provisions transferred to the REC | REC V2 |
| Schedule 21 | The Procedure for Supplier submission of and early reading (POS) or old supplier estimated reading (OSER) | Provisions transferred to the REC or UNC (TBC) | Pre REC |
| Schedule 22 | SPAA Metering Schedules | Provisions transferred to the REC | REC V3 |
| Schedule 23 | Provision and Utilisation of DES and other supply point information services | Provisions transferred to the REC | REC V2 |
| Schedule 24 | Publication of Operational and Escalation Contact Information | This is not directly impacted by the REC, though there would be a duplicate Schedule for this area. | N/A |
| Schedule 25 | - | Redundant Schedule | N/A |
| Schedule 26 | Breach & Event of Default Process | This is not directly impacted by the REC, though there would be a duplicate Schedule for this area. | N/A |
| Schedule 27 | - | Redundant Schedule | N/A |

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| Schedule 28 | - | Redundant Schedule | N/A |
| Schedule 29 | Technical Glossary | Definitions to be reviewed and migrated for REC V2 and REC V3 | REC V2 REC V3 |
| Schedule 30 | The Procedure For Resolution Of Duplicate Meter Points (RDM) For The Same Gas Supply | Provisions transferred to the REC | REC V2 |
| Schedule 31 | Procedure for the resolution of Crossed Meters | Provisions transferred to the REC | REC V2 |
| Schedule 32 | Meter Asset Manager Arrangements | Further consideration for whether MAMCoP should form part of the REC. | REC V3? |
| Schedule 33 | Theft of Gas Code Practice | All theft provisions to be migrated to the REC in one go. | REC V3 |
| Schedule 34 | Theft Risk Assessment arrangements | All theft provisions to be migrated to the REC in one go. | REC V3 |
| Schedule 35 | Gas Smart Metering System Operator (SMO) Retrospective Update Process | Schedule to be removed before REC implementation | N/A |
| Schedule 36 | Provision of Smart Meter Roll-out Data to Transporters | This is not directly impacted by the REC, though can be transferred across into enduring governance. | REC V3 |
| Schedule 37 | Energy Theft Tip-Off Service | All theft provisions to be migrated to the REC in one go | REC V3 |
| Schedule 38 | - | Redundant Schedule | N/A |
| Schedule 39 | Gas Theft Detection Incentive Scheme | All theft provisions to be migrated to the REC in one go | REC V3 |
| Schedule 40 | Approved Meter Installer Arrangements | Further consideration for whether AMICoP should form part of the REC. | REC V3? |
| Schedule 41 | - | Redundant Schedule | N/A |
| Schedule 42 | The Procedure for Sharing Priority Services Data | Provisions transferred to the REC | REC V3 |
| Schedule 43 | Smart and Legacy Prepayment Activities | Provisions transferred to the REC | REC V2 |