RETAIL ENERGY CODE

CONSULTATION RESPONSE

R0283 – ANNUAL ADDRESS MANAGEMENT UPDATES

DATE ISSUED	24/10/2025
RESPONSE DEADLINE	14/11/2025

LINKS

- Change Proposal Page
- Consultation Register

The completed response document should be uploaded to the REC Portal. On the Consultation Page click 'Add Response' to upload the completed document. Further information about Consultations can be found in the Change Management User Guide.

Responses can be submitted as:

- **Non-confidential** – the full response plus the submitting organisations name and category will be published; or
- **Confidential** – responses will only be shared with RECCo, the Code Manager, the Responsible Committee and the Authority (where relevant) but will not be published to REC Parties, Service Providers or wider stakeholders. Details of the response will not be referenced in any Change Report; or
- **Anonymous** – the full response will be published, but will omit the name of the submitting organisation (organisation category will be published). Details of the response will be referenced in the Change Report, and the organisation name will be shared with RECCo, the Code Manager, the Responsible Committee and the Authority (where relevant).

Organisations can submit the whole response as non-confidential, confidential or anonymous, or flag each question separately as they wish.

All responses will be treated as non-confidential unless indicated otherwise.

The Code Manager recommends that only financials or other commercially sensitive information is submitted confidentially, and that anonymous is used for all other cases where the submitting organisation does not wish to be identified, as this allows the details of the response to be seen in the Change Report and for the Code Manager's comments to the response to be published.

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1 RESPONDENT DETAILS

NAME	David Addison
ORGANISATION	Xoserve
ORGANISATION CATEGORY	Other – GRDA / CDSP
EMAIL ADDRESS	David.addison@xoserve.com
TELEPHONE NUMBER	
RESPONSE CONFIDENTIALITY	Non-Confidential

2 QUESTIONS

1. Do you agree with the proposed solution? If not, please explain why?

We understand that this change is establishing the Address Prioritisation Matrix framework principle and then the activities to be undertaken for each category of issue will be subsequently determined via consultation. We recognise the complexity of the address processes, but in order to provide support this change we feel that this change should set out the criteria against which activities defined within the Address Prioritisation Matrix will be established and the nature of the consultation processes that will be followed to ensure that full Impact Assessments can be conducted by impacted parties. We consider that the criteria to establish these should be part of the solution for this change.

Until the criteria for items being added to the Address Prioritisation Matrix are established, we have reservations supporting objectives being placed on parties.

As the CDSP, Xoserve have expended a reasonable amount of time to review MPLs with a view to establish processes that will support the CRS in managing the REL. I acknowledge that more time could have been attributed to the activities, but we needed to establish robust processes given the importance of the MPL. We also acknowledge that since this time and effort that was expended the CRS has sought to engage on the subject of the REL and we welcome the additional insights that this engagement has provided in relation to REL derivation.

There are distinct stages within the REL derivation that parties cannot be responsible for, and so if there is any inference that the end of the process is the derivation of a REL then the extent to which parties can influence this is questionable, and as such we have reservations and cannot agree with the proposed solution. In previous reviews undertaken we have provided updated MPLs where addresses still haven't met the 'gold standard' REL address match but that we are satisfied are valid locations of the Meter Point. REC Parties cannot be responsible for match activities. We welcome recent insights provided by the CRS team as to reasons why RELs are not matched to MPLs, and we will continue to work with the team at CRS to assess whether any of the criteria that prevent REL derivation can be removed from the MPL without degradation of the MPL.

The creation of the REL was specifically introduced to recognise that the MPL is not a recognised address or because the MPL is satisfactory to fulfil the GTs objective to maintain a record of where the meter point is,

therefore, it should be acknowledged that there will be instances that the MPL will not result in derivation of the REL.	
RESPONSE CONFIDENTIALITY	Non-Confidential

2. Do you agree with the proposed implementation approach (BIG BANG)? If not, please explain why?	
We do not comment specifically on the implementation approach. As referenced above, we have reservations related to this change without better information related to establishing the criteria to determine the items that will be added to the Address Prioritisation Matrix, and the assessment processes afforded to parties for each such addition.	
RESPONSE CONFIDENTIALITY	Non-Confidential

3. Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
The Address Prioritisation Matrix itself will not result in additional costs. However, each entry within the Matrix will result in costs for parties as this will create specific areas of focus that will require assessment to define processes and may require system solutions.	
RESPONSE CONFIDENTIALITY	Non-Confidential

4. Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the Change Panel?	
We have no comments on whether authority or self governance.	
RESPONSE CONFIDENTIALITY	Non-Confidential

5. Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to determination by the Authority following approval by the Change Panel?

As this change is stated as SG, assume that this question is included in error. We have no comments on whether authority or self governance.	
RESPONSE CONFIDENTIALITY	Non-Confidential

6. Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 27 February 2026? If not, please explain why?	
We acknowledge that this is establishing the Address Prioritisation Matrix only and that separate consultations will establish the content of the matrix. We are not aware of the timeline or process that will be followed for introduction for such content, nor do we understand the nature of such proposals. I think the above should be set out within this change proposal in order to assess this change proposal. The complexity of establishing processes to manage addresses should not be under estimated.	
RESPONSE CONFIDENTIALITY	Non-Confidential

7. Do you have any other comments relating to this Change Proposal?	
RESPONSE CONFIDENTIALITY	Choose an item