RETAIL ENERGY CODE

CONSULTATION RESPONSE

I0286 – CLARIFICATION ON DETAILED IMPACT ASSESSMENT ACTIVITIES

DATE ISSUED	20 February 2026
RESPONSE DEADLINE	13 March 2026

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will only be shared with RECCo, the Code Manager, the Responsible Committee and the Authority (where relevant) but will not be published to REC Parties, Service Providers or wider stakeholders.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 (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 agree with the principles that this change is trying to establish. As documented in the change proposal, the REC Change process controls complex system processes, and parties impact assessments will be entirely dependent upon the solution options that have been proposed by 'lead' providers.

We do not agree with the solution as described. We consider that the activities expected of this design will be distinct and outside activities currently expected in DIAs – so should be recognised as a distinct activity.

We do however agree that, in certain circumstances, the provision of a more detailed design would form a helpful part of the change process. The impact assessment process (including IIA, PIA and DIA approaches) has been designed to support RECCo and REC parties in developing a full and complete set of requirements, agnostic of solution, with the intention that a solution can then be worked up that meets all these requirements. Typically, multiple options could be provided as part of a PIA for the purposes of testing understanding of requirements and further refining these down to a leading solution as part of the DIA.

As such, we think that the ability for the Responsible Sub Committee to instruct design works to be undertaken is correct, but we see that this activity is distinct from the activities undertaken in the DIA – and we believe that it would be helpful to define this as a separate request outside of the existing IA requests. We would expect that DIAs may still be required by the Code Manager in order to refine options to a single solution to progress to the relevant Panel and into 'Design'.

We have reservations that by NOT classing this distinct activity separate from the DIA that there is an inference that standard DIAs could include design artefacts going forward or that the Design periods would be subject to defined timescales associated with the existing IAs. Such design activities will require detailed resource planning and will typically far exceed the timings currently envisaged in paragraph 12 of the Change Management Schedule.

We also note that in some instances, working with the Code Manager, we have been able to agree that certain steps within the development process are eliminated – e.g. a DIA is conducted without a PIA. We suggest by creating this Design artefact as a distinct product that this will enable clarity for the Service Provider whilst supporting this flexibility.

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2. Do you agree with the proposed implementation approach (Big Bang)? If not, please explain why?

We do agree that a single implementation / change would be the best approach to this – noting that stakeholder engagement would be key to achieving this and managing expectations accordingly.

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3. Do you agree with the Code Manager's assessment of the costs and benefits for this change?

With our proposed approach, we would agree that there should be no specific implementation costs associated with this change, the change is seeking to propose the ability for the Code Manager, with the approval of the relevant Sub Committee, to request that Service Providers undertake specific design activities.

If the proposed solution is pursued this is likely to have contractual impacts where DIA activities are defined.

We do observe that undertaking detailed design activities divorced from build and test activities have the potential to lead to diseconomies of scale depending on the delivery model adopted by the Service Provider.

From a GRDA perspective, we would also need to consult with DSC Change Management Committee with respect to undertaking these design activities. Whilst we would not anticipate that they would prevent activities taking place this would need to be confirmed on a case by case basis in relation to each release.

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 REC Change Panel?

We have no comments on whether authority or Self Governance.

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5. Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 26 June 2026? If not, please explain why
As is observed within the Change Report, this approach has already been undertaken for previous changes so we do not think that the Code Manager should be prevented from requesting the Design to be undertaken as an activity distinct from the DIA within the Change Process. We welcome clarity related this to be defined in the Change Schedule outside of Paragraph 12.

We feel that an additional step in the process outside the impact assessment would be a more suitable way to achieve the outcome that RECCo are looking for without impairing the impact assessment process. A consideration would be a document that follows a DIA that explores the specifics of a solution without the inclusion of impact assessment narratives, creating clarity on the scope, functionality, dependencies and implementation timescales being proposed.

For example:

IIA > PIA > DIA > [Additional Solution Confirmation doc.]

RESPONSE CONFIDENTIALITY	Non-Confidential

6. Do you have any other comments relating to this Change Proposal?
No

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