

By email to: [rachel.clark@ofgem.gov.uk](mailto:rachel.clark@ofgem.gov.uk)

Rachel Clark  
Director, Retail Systems Transformation  
Ofgem

14 February 2020

Dear Ms Clark,

### **Switching programme Significant Code Reviews (SCRs) – BSC Panel response**

The BSC Panel reviewed your letter of 28 January 2020 at its meeting on 13 February 2020 ([BSC Panel paper 299/08](#)). I am writing to you on behalf of the BSC Panel. We are confident of meeting your 31 March 2020 deadline subject to the caveats below. ELEXON, on behalf of the BSC Panel, have been working with Ofgem, other Codes and industry for some time. I understand there has been good collaboration and working relationships established. Consequently, I believe these caveats are well understood by your colleagues and they regard this response as acceptable.

On 9 October 2019 ELEXON raised [Issue 86 'Review of processes potentially impacted by Ofgem's Faster Switching Programme'](#) to assist with preparing proposed document changes for the Switching SCR implementation in summer 2021. Issue 86 was extended in time and scope to carry out the same function for the Retail Code Consolidation (RCC) SCR changes in January 2020.

ELEXON will, as agreed by and on behalf of the BSC Panel, submit to you no later than 31 March 2020:

- Redlining and proposed draft legal text for the Switching SCR;
- Redlining and proposed draft legal text for the RCC SCR; and
- Consolidated document for both SCRs (annotated to differentiate between SCRs).

It should be noted that ELEXON understands that Ofgem will 'dovetail' the BSC drafting with the drafting from the other associated Codes. It is not possible for ELEXON to do this by 31 March 2020 as there is not currently sufficient visibility of the changes to the other Codes.

The consolidated documents will also remove conflicts between the two SCRs on the basis that the RCC changes will be implemented ahead of CSS changes. We considered your request for our plan for developing alternate text should this be reversed. We note this is a fall back contingency preparation and it is not your intent to follow this route. As such, we feel the priority must be preparation of documents to support your SCR consultations due this spring. At this time, it would be reasonable to assume it will take ELEXON between 4-6 weeks to produce this alternative text and a one month notice period to mobilise. Provision of this text is subject to confirmation and will be affected by other obligations at the time of the request.

The Panel understands that you are still reviewing how Metering and Performance Assurance obligations will be split between the BSC and REC, and ELEXON is helping with this process. As such, ELEXON will only be able to propose Metering and Performance Assurance redlining so far as the relevant REC drafting has been finalised. ELEXON will aim to deliver as much of the Metering and

Performance Assurance redlining as they can by 31 March 2020, and will keep you informed as part of on-going discussions as to when the remainder will be available once you have made your final determinations in this respect.

Issue 86 identified some potential improvements to the switching related provisions in the BSC that would support the spirit of the Switching Programme. These are not directly related to the SCRs but, Issue 86 Members believe they will have a positive impact on the transition to faster switching. The Panel understands that you are discussing with ELEXON whether they can be incorporated into the SCRs, raised as changes now or wait until after the SCRs are complete. We trust that you will agree a way ahead with ELEXON regarding these potential changes.

We note your BSC Section F and SCR comments. Prior to making your directions in November 2020 we would appreciate further guidance as to your expectations in terms of governance and practical management of the process. ELEXON, in their role as manager/administrator of the BSC, will engage with your team to resolve any concerns they may have and will keep us informed as required.

As part of the plan that we approved, ELEXON will provide you with a list of Modification Proposals and Change Proposals on-going and expected that could impact the Switching and RCC SCRs. This will be updated as required. Please find the Panel's plan, provided by ELEXON, as requested in your letter in Appendix A.

The Panel looks forward to future updates on the switching programme as necessary and welcomes continued collaboration and engagement between ELEXON and Ofgem and other key stakeholders.

If you have any questions relating to this letter, please contact Chris Wood (Issue 86 Lead Analyst) on 020 7380 4142/ [bsc.change@elxon.co.uk](mailto:bsc.change@elxon.co.uk).

Yours sincerely,

Michael Gibbons CBE

BSC Panel Chair, on behalf of the BSC Panel

Appendix A – High level plan to deliver SCR changes

## APPENDIX A: HIGH LEVEL PLAN TO DELIVER SCR CHANGES

### ELEXON's high level plan week by week

Date	Activity – Switching SCR	Activity – RCC SCR	Date	Activity – Switching SCR	Activity – RCC SCR
27-Jan	Draft CSS text	Await consolidation plan	02-Mar	Review and checks	Review and checks
28-Jan					
29-Jan					
30-Jan	Issue 86 Meeting		05-Mar	Issue Group Meeting (date TBC)	Issue Group Meeting (date TBC)
31-Jan	Draft CSS text	Consolidation plan released by Ofgem	06-Mar		
03-Feb	Draft CSS text	Analyse Code Consolidation plan	09-Mar	Consolidation and de-confliction	
04-Feb			10-Mar		
05-Feb			11-Mar		
06-Feb			12-Mar	BSC Panel - progression update	
07-Feb			13-Mar	Consolidation and de-confliction	
10-Feb	Draft CSS text	Draft RCC text	16-Mar	Consolidation and de-confliction	
11-Feb			17-Mar		
12-Feb			18-Mar		
13-Feb	BSC Panel Meeting - discuss plan		19-Mar		
14-Feb	Submit plan to Ofgem		20-Mar	Final reviews and checks	
17-Feb	Draft CSS text	Draft RCC text	23-Mar		
18-Feb			24-Mar		
19-Feb			25-Mar		
20-Feb			26-Mar		
21-Feb			27-Mar		
24-Feb	Review and checks	Draft RCC text	30-Mar	Final preparation for submission	
25-Feb			31-Mar	Submit proposed changes to Ofgem	
26-Feb			01-Apr	Prepare Issue 86 Report for BSC Panel	
27-Feb			02-Apr		
28-Feb			03-Apr		
Draft Documents		Review documents	Panel activity		Issue Group Meeting

The above is for planning purposes only and is subject to change. It should not be seen as definitive but indicative of intended progression between 28 January and 31 March 2020.