

By email to:

Rachel Clark
Director, Retail Systems Transformation
Ofgem

15 February 2020

Dear Rachel,

Switching programme Significant Code Reviews (SCRs) – BSC Panel intent

In response to your letter of 28 January 2020, ELEXON presented its progression plan to the BSC Panel at its meeting on 13 February 2020. Having reviewed your letter and considered the paper presented by ELEXON ([BSC Panel paper 299/08](#)), we are confident of meeting your 31 March 2020 deadline subject to the caveats below.

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 will be extended in time and scope to carry out the same function for Retail Code Consolidation (RCC) SCR changes.

ELEXON will submit to you no later than 31 March 2020:

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

It should be noted that we anticipate the need for Ofgem to 'dovetail' the BSC drafting with the drafting from the other associated Codes.

The consolidated documents will also de-conflict between the two SCRs on the basis that the RCC changes will be implemented ahead of CSS changes. We note your request for developing alternate text should this be reversed but, as you should be aware, ELEXON **will not** be able to produce this by 31 March 2020 due to time restraints. ELEXON will be happy to provide it in due course if requested. It would be reasonable to assume it will take between 3-4 weeks to produce this alternative text but, this is subject to confirmation and will be affected by other obligations at the time of request.

We understand 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 2021 and will keep you informed as part of on-going discussions as to when the remainder will be available.

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 however, Issue 86 Members believe they will have a positive impact on the overall switching process. We understand that you are discussing this with ELEXON as to whether they can be incorporated into the SCRs, raised as changes now or should wait until after the SCRs 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.

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.

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

Yours sincerely,

Michael Gibbons CBE
BSC Panel Chair

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			
17-Feb	Draft CSS text	Draft RCC text	23-Mar	Final reviews and checks		
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.