RETAIL ENERGY CODE

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REC CHANGE ISSUES GROUP
MEETING MINUTES

MEETING	**RECCHIG_25_0501**
DATE	**01 May 2025, 10:00**
LOCATION	**By teleconference**

Presenter	Representing	Initials	Role
Glenn Sheern	REC Code Manager	PWD	Chair
Caroline Freimuller	REC Code Manager	CF	Lead Analyst
Harriet Truss	REC Code Manager	HT	Lead Analyst
Holly Law	REC Code Manager	HL	Change Delivery Manager
James Hardy	REC Code Manager	JH	Lead Analyst
Lorna Mallon	REC Code Manager	LM	Subject Matter Expert
Mica Thomas	REC Code Manager	MT	Lead Analyst
Mollie De Camp	RECCo	MD	Operations Consultant
Harry Firth	REC Code Manager	HF	Secretariat

Full attendee list available upon request.

1. INTRODUCTIONS

The Chair welcomed attendees to the REC Change Issues Group (CHIG) meeting. There were apologies received from Paul Witton-Dauris.

2. CONFIRMATION OF AGENDA

The Chair invited any additional items of business for consideration during the meeting and noted there were two updates from the Code Manager on R0122 and I0237. A DNO representative raised an item on R0053.

3. APPROVAL OF THE PREVIOUS MINUTES

The Chair invited attendees to provide comments on the draft minutes from the meeting which took place on 03 April 2025. HF advised that no comments had been made prior to the meeting.

There were no comments, and the minutes were approved as an accurate reflection of the meeting.

4. I0241 – MHHS INCREMENTAL CHANGES FOR GO LIVE

HT provided attendees with an overview of the Issue. HT advised that the focus in this session would be taking a deeper dive into the MHHS Activation scope items and two new scope items, as well going through a recap of all the I0241 scope items and an overview of the legal drafting.

MHHS Activation v MHHS Qualification

HT provided an update on this issue that was summarised in the April Change Issues Group meeting by Sarah Jones (RECCo). HT advised that provisions within the REC relating to Reverse Migration reference MHHS Qualification, i.e., where an MHHS Metering Point is registered by a Supplier that is not MHHS Qualified, then the Metering Point will undergo Reverse Migration. HT added that in practice, the qualification status does not determine whether a Metering Point should be Reverse Migrated, but when a Supplier is activated after MHHS Qualification.

HT advised that REC provisions relating to MHHS Qualification are derived from Section C12 of the BSC, however the BSC does not define activation and therefore the REC drafting cannot cross reference the BSC. HT advised that the REC drafting had been developed to introduce two additional definitions, "DIP Identifier" and "MHHS Activation", to ensure the provisions legally reflect the technical solution, and the migration drafting has been updated to reflect these new definitions. HT added that this approach has been shared with the MHHS Programme, and the Code Manager has received support to carry this forward. HT added that drafting updates will be required in Schedules 1 and 9 and the new Schedule on MHHS Migration.

HT advised that the Code Manager's recommendation was there is no impact assessment required for this scope item as there are no changes required by participants. A poll returned unanimous agreement from 11 votes that an impact assessment was not needed. Another poll returned 100% approval from 12 votes that this item should be confirmed in scope for I0241.

Drafting Alignments

HT advised that the Code Manager is considering two additional scope items in I0241 that capture alignments or corrections within the REC MHHS drafting in the new MHHS Migration Schedule approved under R0209.

- HT advised that the first proposed scope item is the removal of erroneous references to the MHHS Transition Schedule within the new MHHS Migration Schedule and replacing with references to Schedule 14 - Metering Operations.
- HT advised that the second proposed scope item is the inclusion of the cross reference to the process step for retrospective appointments within the new MHHS Migration Schedule for the MHHS Migration with Switch process. HT added that this update will reflect the MHHS Design and equivalent process steps in Schedule 14 – Metering Operations.

HT advised that the Code Manager's recommendation was that no impact assessment was required for these two scope items. A poll returned unanimous agreement from 8 votes that no impact assessment was required. Another poll returned 100% agreement from 11 votes that these items should be confirmed in scope for I0241.

Drafting

HT took attendees through a table listing all of the scope items within I0241, each with a status on drafting and impact assessment (if applicable). HT advised that all of these scope items had been discussed in Change Issues Group meetings and approved to be included within the Change Proposal by attendees. HT noted one scope item on new Metering Points that has not been included within I0241 as the relevant SDES requirements are not captured in the REC Code.

HT provided a summary of the proposed legal drafting for each scope item in I0241 and took the attendees through each item. A DNO representative asked about a scope item on a single CSS Market Message for agent appointments and noted that in the MHHS Programme Change Request impact assessment responses, it had been requested to add clarification that it should be a single Market Message per MPAN. A RECCo representative responded that this was indeed technically correct, and the Code Manager would look into adding that clarification into the legal text.

Next Steps:

HT advised that the legal drafting for I0241 will be reviewed further at the Code Drafting Working Group (CDWG) on 13 May and encouraged attendees to make any comments on the drafting prior to that meeting. HT advised that an additional Change Issues Group meeting later in May was now unlikely as no further potential scope items for I0241 had been noted. HT added that any proposed new additions to I0241 would be covered through the CDWG and Cross Code Advisory Group (CCAG) meetings on 10 and 25 June.

HT advised that I0241 will be progressed to a Change Proposal, as R0241, alongside the respective BSC and DCUSA changes, after the CCAG meeting on 28 May. HT added that these changes will have a coordinated timetable under an Ofgem Significant Code Review, and it is expected that a consultation will be released in June, depending on endorsement at the May CCAG meeting.

The Chair and HT encouraged attendees to get in contact by emailing Harriet.Truss@recmanager.co.uk if they had any questions or issues with the content covered in this meeting. They thanked attendees for their interactions with the polls.

5. QUARTERLY ISSUES UPDATE

HL provided attendees with a quarterly update on all raised Issues in the REC since the changes to the Change Management process were introduced in June 2024:

HL advised that:

- 50 Issues have been raised overall.

- 12 Issues are at the Initial Assessment stage.
- 13 Issues are at the Solution Development stage.
- 10 Issues are currently out for Service Provider or Party Impact Assessments
- 6 Issues have been progressed to Change Proposals
- 5 Issues have been withdrawn or rejected.
- 4 Issues are currently on hold.

HL advised that from the next Change Issues Group meeting, the Code Manager will present tracker slides which provide updates on individual Issues progressing through the Change Management process.

6. I0179 – PROPOSAL FOR LIMITING QUERIES IN EES API CALLS (SINGLE QUERY PER API CALL)

HL provided an update on this Issue to attendees. HL advised that this Issue had been raised to standardise the number of queries per single API call to one, as APIs are designed to be used often for small amounts of data rather than infrequently for large amounts of data, and that a large number of queries within a single API call can cause system instability.

HL added that the Issue had been on hold due to MHHS and resourcing issues within the Service Provider, but it is now moving forward, and the Service Provider had completed their impact assessment. HL advised that the original Issue submission had suggested a limit of 1000 queries per API call, but the Service Provider had suggested copying the GES API and reducing to one query per API call following the completion of their impact assessment. HL added that this new limit had been recommended as the Service Provider felt the first suggested solution of 1000 queries per API call could encourage Parties to batch their queries.

HL advised that a party impact assessment is currently open for responses until 20 May and encouraged all interested Parties to provide a response to the Code Manager.

7. I0205 – PROVISION OF HALF-HOURLY CONSUMPTION DATA FOR ADVANCED METER ERRONEOUS SWITCHES

JH provided attendees with an overview of the Issue. JH advised that as part of the MHHS REC Code change activity, a change has been made to Schedule 30 to remove the Half-Hourly meter exemption from the Erroneous Switches (ES) provisions. JH added that the Code change was necessary from an MHHS perspective, but the application of ES obligations in the Advanced Meter segment create some additional challenges. JH advised that in the absence of this Half-Hourly consumption data for ES Consumers, Energy Suppliers are currently required to estimate consumption for billing purposes which can lead to inaccurate billing and Consumer detriment.

JH advised that to accurately bill an Advanced Meter site, following repatriation of the Consumer to their correct Supplier after an ES has been raised, the Supplier need to have access to Half-Hourly consumption data for the ES period when they were not the registered Supplier. JH added that with ES's potentially taking up to two years to identify and resolve, the only place that the Supplier could reliably source this information is from the losing Supplier.

JH advised that an approval of this Issue would see an obligation placed on the losing Supplier following a successful ES repatriation to provide the gaining Supplier with the required Half-Hourly consumption data for when they were erroneously supplying the meter. JH added that a suggestion had been made by the Proposer that this data could be provided by the losing Supplier via SDEP using an Excel template within five working days of the ES repatriation switch date. JH added that the gaining Supplier would be required to provide 48 Half-Hourly consumption intervals for each day that the Energy Supplier was supplied erroneously.

JH noted that that the Code Manager are aware of work currently going on by Elexon which means that this required data could be provided at some point once MHHS has gone live, so the proposed solution has taken this into mind, and that it may only be a short-term solution.

JH advised that the Code Manager's thinking is to keep this short-term solution as simple and cost-effective as possible. JH added that this solution may be to include an obligation within Code on the losing Supplier to share the Half-Hourly consumption data, through the existing Erroneous Transfers General Query Process type screens on SDEP, rather than a new process type screen as it would heavily delay the implementation due to the impacts of the MHHS Code Freeze. JH added that the Code Manager is working towards an implementation as part of the November 2025 REC release, the first available release after M10.

A DNO representative asked if there was a timeframe on this potential long-term solution from Elexon and whether this change would be worth taking forward. JH responded that there are no available timeframes at the moment, but the Code Manager will be engaging with Elexon on this matter. They suggested that if all goes well, a REC solution using this Elexon data could be raised in potentially 18 months to two years. JH added that there is no guarantee that that this Elexon data will form a long-term solution either.

A supplier representative asked if the Code Manager know of the volume of ES's and aware of how big this issue is. JH responded that they do not have data that they can share at the moment, but this is something that will be captured as part of the business case assessment for the Change Proposal. They added that if it were a small number of ES's, which would push towards simplifying the solution as much as possible.

JH thanked attendees for their engagement and advised that they would aim to bring this Issue back to the June Change Issues Group meeting to provide some clarity on the solution and plans for an impact assessment.

6 I0232 – NON-DOMESTIC CHANGE OF OCCUPIER SDEP SCREENS (R0155 SOLUTION)

JH provided attendees with an overview of the Issue. JH advised that the part impact assessment for this Issue closed on 04 April. They thanked the parties that responded and advised that these responses are being used to set the solution requirements ahead of the Service Provide impact assessment.

JH showed a list of the proposed requirements for the design of the SDEP Process Type Screen(s). They asked attendees if Consumer names or further Consumer details should also be included as a requirement, adding that a couple of the impact assessment responses had suggested this as an addition.

A DNO representative asked if there were any General Data Protection Regulation (GDPR) issues with this potential addition. JH responded that some of the potential Consumer details that could be included may fall within a Supplier's own data protection policies. They added that as part of the process, the Code Manager will do a legal review to see if there are any GDPR concerns. LM advised that this information will be shared from June onwards, but not on a R0155 dedicated SDEP screen. They added that it is for all non-domestic Consumers, some of whom will be Sole Traders, so acknowledged that there will be a risk, but there was a justification for sharing this information as part of R0155. This had already been discussed and confirmed as part of the R0155 change journey.

JH thanked attendees for their inputs and advised that the next step was the Service Provide impact assessment. They added that the dates for this were still unknown, but they would provide further updates as this Issue progresses.

8. R0162 – ACCESS TO SDES FOR GAS NETWORKS

CF provided attendees with an overview of the Issue. CF advised that Gas Transporters were not included within the scope of the Secure Data Exchange Service (SDES) as their main interactions were with Shippers. CF added that it has become clear recently that GTs do send direct queries to Suppliers, including MPRN level data, so there is a requirement for a secure means of transferring this data. CF added that the main current means of transferring data is via email which is less secure and efficient as there is no central list of contacts.

CF advised that a party impact assessment for this Issue closed on 29 April, and the published paper has confirmed the proposed Process Types (PTs) and the proposed data items on each PT. CF provided a brief overview of the feedback from the party impact assessment, that responses were happy with the PTs, believed there was a benefit in having escalation PTs to support each of the proposed use cases, and supported the inclusion of a Supplier to GT scenario variant for each PT, as well as GT to Supplier.

9. I0235 – MISSING SCENARIO VARIANTS IN D0179

CF provided attendees with an overview of the Issue. CF advised that following feedback received in the March Change Issues Group meeting, the Code Manager were looking at alternates to the original solution of adding back the missing scenario variants to the D0179 flow. CF added that feedback had been received that D0179s are only used for traditional prepayment meters, which are to be phased out over coming years for Smart meters, and even

in this scenario, DNOs and MOAs often send the D0139 flow instead. CF advised that the Data Transfer Network (DTN) had confirmed that only 280 D0179s had been sent between January 2024 and March 2025. CF added that the D0179 DNO to MOA variant had been added back to Schedule 14 in error.

CF advised that there had been feedback received that the D0179 flow could be removed entirely and the D0139 flow used for all meter types, especially as a lot of Suppliers currently do this anyway. They asked attendees if they had a preferred solution, and if an alternate Change Proposal should be raised so they can consult on both options. A poll received 10 votes, with 90% supporting the raise of an alternate Change Proposal.

DNO and MOA representatives advised that they would support the removal of the existing D0179 scenario variants from Schedule 14 and that they do not ever send a D0179.

CF advised that this Issue had been raised at the Cross Code Steering Group meeting on 28 April that if the removal of the D0179 flow is taken forward as the preferred option, there will need to be a cross-Code BSC change to remove an obligation regarding D0179. CF added that this had been flagged to BSC, and they will continue to engage with Elexon on this Issue.

10. RECCO SIR SURVEY AWARENESS

MD advised that RECCo have commenced on the annual Switching Incentive Regime Stakeholder survey. MD added that this survey is based on DCC performance and how they are managing incidents and solutions for their Stakeholders, and these responses will form the response sent by RECCo to Ofgem. MD advised that this online survey is open to responses until 08 May.

11. AOB

The Chair invited attendees to provide AOB.

MT provided an overview of I0237 – Erroneous Switch Review. MT advised that ES resolution has not undergone an end-to-end review since the REC go live date, and Consumers are being impacted due to gaps within the process. MT added that this Issue will allow the Code Manager to review this process, as well as to ensure it aligns with faster switching and MHHS. MT advised that the Code Manager's recommendation is for this Issue to either return at the June Change Issues Group meeting or a separate Working Group for solution development.

A Supplier representative suggested that if this is to be an end-to-end review of the ES resolution process, then there should be a longer response period than the standard time due to the extra detail. MT agreed. Another Supplier representative expressed support for a separate Working Group due to the level of detail that will be covered by this review.

A DNO representative asked if the Code Manager would be looking into breaking this review down into intersections, as this could be easier for parties. MT responded that the Code Manager is still in the initial assessment stage and will be looking at breaking down this Issue at a later point.

The Chair provided a brief update on R0122 - SDEP Review Improvements (2) - Usability. The Chair advised that this Change Proposal had been put on hold due to the MHHS Code Freeze but is due to move forward again in due course.

A DNO representative requested for R0053 – 24/7 Emergency Metering Service to be withdrawn as the Proposer as Ofgem have recently published their licensing conditions on this matter and indicated they would be keen on discussing a new Change Proposal with the Code Manager. HL responded that they would withdraw R0053 and reach out to the DNO representative about raising a new Change Proposal.