RETAIL ENERGY CODE

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R0207 IMPORT / EXPORT MOA CHARGING CLARIFICATION WORKING GROUP 3
MEETING MINUTES

DATE	**02 February 2026, 13:00**
LOCATION	**Microsoft Teams**

Attendee	Representing	Initials	Role
Holly Law	REC Code Manager	HL	REC Change Delivery and Release Manager
Jon Hawkins	Retail Energy Code Company	JH	Director of Market Design
Daniel Declercq	Octopus Energy	DD	Working group member
Rebbecca Bennett	Centrica	RB	Working group member
Yvette Lawrence-Hood	Centrica	YLH	Working group member
Simon Shaw	Good Energy	SS	Working group member
Tricia Grace	IMServ	TG	Working group member
Riley Gallacher	Octopus Energy	RG	Working group member

1 INTRODUCTIONS

HL opened the meeting and explained that the group had re-convened following the Party impact assessment, to review the responses and address any concerns raised and to provide additional clarity if needed.

2 IMPACT ASSESSMENT REPONSES SUMMARY

JH provided a summary of the impact assessment responses received from Parties. (Slide 2)

3 IMPACT ASSESSMENT QUESTION 1 - 2

JH gave an overview of the responses received for these questions, and the Code Managers comments (slide 3 - 4).

There were no questions.

4 IMPACT ASSESSMENT QUESTION 3

JH gave an overview of the responses received for this question, and the Code Managers comments (slide 5).

JH asked the working group if they would support looking at a longer-term solution, caveating that this would need to be done post MHHS due to risk to Migration?

RB shared support at looking at something long term and agreed that it should be after MHHS Migration.

JH explained that his view at the minute that the longer-term solution being explored, does not remove the need to progress this solution.

5 IMPACT ASSESSMENT QUESTION 4

JH explained that he could not go into detail on this question as the responses were confidential, but they did highlight there would be some additional costs to MOAs for this Change Proposal.

6 IMPACT ASSESSMENT QUESTION 5 & 6

JH gave an overview of the responses received for these questions, and the Code Managers comments (slide 7&8).

There were no questions or comments from the working group.

7 IMPACT ASSESSMENT QUESTION 7

JH gave an overview of the responses received for this question, and the Code Managers comments.

RB expressed that she agreed with the assumption. There is large commercial risk here with the current MHHS Programme design, but there is, by exception, a risk to Consumers. If a Consumer was to contact the Export Supplier to say, they need you to come out and they've only got those basic services, it is going to cause some delays to being able to get someone out for that Consumer. However, she said that

she was comfortable that is going to be explored that separately and that this Change Proposal still needs to get across the line because of the more immediate commercial risk.

8 IMPACT ASSESSMENT QUESTION 8

JH gave an overview of the responses received for these questions, and the Code Managers comments (slide 10).

JH clarified that the solution in the Change Proposal only applies to MHHS Metering Points and also would not apply to Export only and while the legal text does provide for this, it is not immediately clear. He asked for views on whether clarifying within the text what is excluded from basic services should be included?

TG, RB and RG agreed that this would be helpful.

JH agreed that this would be added to the legal drafting.

RG asked that on the clear timescales, he couldn't see the reference to the past rules and asked for a separate e mail/ call. JH asked if others were looking for the clarification. No one else asked for clarification so agreed would be picked up outside of the working group call.

9 IMPACT ASSESSMENT QUESTION 9 & 10

JH gave an overview of the responses received for these questions, and the code managers comments (slides 11&12).

JH asked the group for views on implementation.

RB said they would support implementation at the earliest opportunity as they are already Migrating into MHHS arrangements and have this flagged as a risk against their Export pot for this exact issue.

JH asked what would be the risk of an implementation date coming in before contract negotiations had concluded?

TG answered that from a general point of view, in business to business arrangements, pricing and contract reviews don't always happen annually. So business to business arrangements might be on three to five year contract. So trying to then put through some kind of pricing variation is dependent on both Parties. In a worst case scenario, what would be the outcome for the mower if for reasons they weren't able in that situation to reach an agreement with the Supplier. That might be a stumbling block or a challenge because then where does the responsibility sit in terms of picking up any additional costs on the import side? So that might be one challenge with having a hard date to go at, but is open to what other think.

SS added that he was supportive at an earlier implementation time, but noting that, organisations are probably going to have different views on this question, however, coming back to the solution again and the interaction with MHHS and those basic services, that is really the focus of the solution here and that doesn't prohibit those discussions outside of that for additional services. So that's why, they are supportive of an earlier implementation that's closely aligned with market wide.

JH confirmed he'll take it away and think about what the right proposal for the implementation date will be, noting this will go to the Authority for decision. So any implementation date will be subject to their decision to approve or not.

10 IMPACT ASSESSMENT QUESTION 11

JH gave an overview of the responses received for this question, and the Code Managers comments (slide 13)

RB said that she was not sure she'd agree with the cost saving piece for Export Suppliers because it's not a cost saving, but it's mitigating an increased risk to additional unfair costs, but not saving any costs.

11 NEXT STEPS

JH covered off the next steps as agreed in this working group, these are:

- Agreed that that review of metering arrangements for import Export Suppliers would be helpful. This will be raised as a separate Issue.
- Agreed it would be useful to do a long-term assessment. To be factored into future road map.
- Agreed that in the consultation process, particularly in relation to the timescales, it would be helpful to ask a specific question around whether those timescales would be affected if this general proposal weren't to proceed and therefore if there is, it's a hard dependency or a soft dependency.

HL thanked attendees for their engagement and feedback. Participants encouraged to reach out via email for further discussion or confidential input.