RETAIL ENERGY CODE

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MEETING MINUTES

MEETING	**RECPAB_25_0729**
DATE	**29 July 2025**
LOCATION	**Teams**

Attendee	Representing	Initials	Role
Jon Dixon	RECCo	JD	PAB Chair
Dorcas Batstone	Independent Member	DBa	PAB Member
Steve Arthur	Independent Member	SA	PAB Member
Steve Verdon	Independent Member	SV	PAB Member
Angela Joyce	Supplier Representative	AJo	PAB Member
Paul Saker	Supplier Representative	PS	PAB Member
Anne Jackson	UNC Representative	AJa	PAB Member
David Brown	MEM Representative	DBr	PAB Member
Paul Everett	Supplier Representative	PE	PAB Member
Bryan Heap	DNO Representative	BH	PAB Alternate
Marina Papathoma	GT Representative	MP	PAB Member
Beth Procter	SECCo Representative	BP	PAB Member
Simon Waltho	BSC Representative	SW	Performance Assurance Manager (Elexon)
Faye Brookes-Lewis	Citizens Advice Representative	FBL	PAB Member
Anton Moden	Code Manager	AM	Performance Assurance Lead
Vaishnavi Sharma	Code Manager	VS	Performance Assurance Manager
Bailey Robb	Code Manager	BR	PAB Secretary
Anna Weeks	RECCo	AWe	Senior Operations Analyst
Jonathan Hawkins (*for item 2)*	RECCo	JH	Director of Operations Programmes
Bilal Ali (*for item 3)*	DCC	BA	Interim Director of Customer Relationship Management
Sodiq Lawal (*for items 4 and 5*)	Code Manager	SL	Service Provider Assurance
Ollie Bowden (*for item 4)*	Code Manager Technical Team	OB	Managing Consultant
Rosalind Timperley (*for item 4)*	Code Manager Technical Team	RT	Managing Consultant
Glenn Sheern (*for items 7 and 8)*	Code Manager	GS	Operational Account Manager

Attendee	Representing	Initials	Role
Eve Marriner (*for item 7)*	Code Manager	EM	Operational Account Manager
Kev Duddy (*for item 7)*	Code Manager	KD	Operational Account Manager
Daniel Rodgers (*for item 9)*	Code Manager	DR	Performance Assurance Qualification Manager

1. APPROVAL OF PREVIOUS MINUTES AND REVIEW OF ACTION LOG

The Chair welcomed attendees to the meeting of the PAB. Apologies were received from Fungai Madzivadondo (DNO Representative).

The PAB unanimously **APPROVED** the actions and draft minutes from the PAB meeting held on 24 June 2025. PAB Members reviewed the open and overdue actions. Five actions were closed following information provided in the meeting papers or via a verbal update.

Please refer to the Action Log for a full status update.

2. REC TRANSFORMATION: DIGITAL SERVICES

JH joined the meeting.

The Director of Operations Programmes at RECCo provided an update to the PAB on the progress of the Digital Services Project, detailing activity so far and the intended next steps, including a high-level plan to November 2026.

The PAB noted that the purpose of the Digital Services Project is to fundamentally improve the experience of users and how they interact with the Code Manager, with a vision of a single point of access for all digital interactions through a single REC Portal. This includes significant improvements to the systems operating in the background such as performance assurance and change management. PAB were advised that any change would not be fundamentally different to what currently exists, rather, it will be redesigned with the application of modern technology principes in mind.

The PAB noted that a dedicated technology partner has been appointed who will commence work shortly alongside the User Test Group to test and refine improvements to the REC Portal, with the aim of launching the new digital services on 1 September 2026.

A PAB Member had noted that they were particularly looking forward to seeing how the new and refreshed portal would look like, as the current one involves a lot of their time looking around or waiting.

The PAB:

- **NOTED** the update.

JH left the meeting.

3. CRS IMPROVEMENTS UPDATE

BA joined the meeting.

A representative from DCC presented an update on the CRS Improvements Plan requested by Ofgem to the PAB, further to the previous update in April. An update was provided for each of the five workstreams, detailing what progress has been made over the period, what the focus is for the next period, and any key risks, issues and dependencies.

On the address data quality workstream, it was noted by the PAB that one dependency on progress is REC Change Issue I0200. DCC's concern is the lack of progress that it is making and the lack of time, and updates that they are receiving. A PAB Member noted their appreciation for the progress being made and queried if there was anything the PAB could do to incentivise further improvements and whether DCC had visibility of where the greatest number of mismatches lie. The DCC representative advised the PAB that they could provide that view to PAB on where most of the volume sits and would discuss with the PAB Chair. However, they advised that where the data is more categorised and specific, historically, when it has been shared with industry and there has been no incentive or target for them to do something, it has not driven an upward trend.

The PAB Chair noted that time is running out to bring the high-level changes arising from I0200 forward and to implement properly. They advised that this is something PAB ought to have scrutiny on but anything the PAB does is done on a goodwill basis and informally until there is full codification of that address quality plan within there, where they could put reasonable expectations on REC Parties. The Code Manager queried whether the Performance Assurance (PA) Schedules being brought forward by the PAB Chair could be used as the vehicle to codify improvements and reduce the dependency. The PAB Chair noted that they wouldn't peg it to specifically the PA Schedules updates immediately, rather, to take an action to see how the PAB can ensure that the governance elements of the address data quality plan can be expedited and in place for the next annual round without curtailing the I0200 group and the work they are doing. The DCC representative queried where and how they could get updates on the work that the I0200 group are doing. A RECCo representative advised that this is something they need to clarify with the Change Team more generally. The PAB Chair noted the action to explore the point on governance and visibility of action in relation to I0200.

On the Change Management workstreams, the DCC representative noted that some of the challenges faced were around the process and elements of it needing simplified and improved as there wasn't a clear differentiation between a small change versus a large complex change being put through the process. For the process on small, non-critical changes, there are discussions ongoing with RECCo as to how this looks and is funded, as well as the governance process.

On the Engagement and Communication workstream, the DCC representative noted key positives in recent feedback on their engagement and communication with the industry over 2024-25 but that there was still more work to do. They noted positive steps being taken on creating and maintaining a regular contact list, using the Operational Account Managers (OAMs) contact list as a baseline. Work is also underway to map current engagements with RECCo and with industry to further baseline, as well as steps to ensure there is a clear line of engagement between the REC, RECCo, and DCC when issues arise.

On the Incident Management workstream, the DCC representative noted four key areas for improvement; improvement to work notes (including mandatory fields so DCC get the information needed and to send quality responses back to industry); category, subcategory, and template enhancement; automation; and third-party incident management.

On the Reporting workstream, the DCC representative advised the PAB that the feedback they have received is that DCC create hundreds of reports per month, with some of them being of no use to people. They advised that a full review is being conducted with a view to drive efficiencies in address matching and switching. They are also looking at reports that are no longer needed, and in the event of regulatory reports, they will engage with PAB on this further.

A PAB Member queried the overall status of the planned programme and whether it was still on track or if there has been some slippage. The DCC representative advised that the programme was being reviewed next week with the programme manager and while certain deliverables and milestones had slipped, they needed to work through what the impact of those are. They noted that this would not cause any major impacts because the work is still progressing in the background, but that the overall plan would be re-baselined and that DCC would share that with PAB. The DCC representative noted that the overall concern was the work is being delivered through existing resources who are doing BAU alongside, and that this would be discussed further too.

The PAB thanked the DCC representative for the update. The PAB discussed the appropriate cadence of reporting and confirmed it wished to receive quarterly updates.

The PAB:

- **NOTED** the update.

NEW ACTION: REC Change Team to clarify how updates on I0200 are shared with REC Parties.

NEW ACTION: REC Change Team to explore how the set up of governance arrangements to set data quality targets can be expedited.

NEW ACTION: DCC to provide an update to PAB when the CRS Improvement Plan is re-baselined, and then provide quarterly updates to PAB.

BA left the meeting.

4. SERVICE PROVIDER ASSURANCE UPDATE

SL, OB and RT joined the meeting.

The Code Manager presented an update on the performance of REC services (up to June 2025) and on the REC Technical Service (RTS) Key Performance Indicators (KPI) review. The review presented PAB Members with a number of key decisions to take on the RTS KPIs.

The Code Manager advised PAB that the proposals and recommendations detailed in the paper had already been discussed by the Code Manager, RTS, and RECCo, all of which agreed on the changes that PAB was being asked to take a decision on.

The Code Manager noted that after the decision of PAB, they expect RTS and RECCo to implement proposals that do not affect incentives in the next two months, and for those proposals that do affect incentives, they expect to confirm implementation in around six months. The reason for this is due to a potential impact on the contractual agreement that will need to be reviewed and agreed further to this decision.

A PAB Member raised their concerns that GES performance continues to be below expected performance levels and queried why that seems to be the case and whether there is something PAB could do to improve GES performance. The Code Manager confirmed they were unable to answer the point raised specifically but believes it may be to do with the technology architecture in the background which is not entirely governed under the REC and requires a lot of manual intervention to update and manage the system which may impact the performance of REC Services. The PAB Member noted that this may be a commercial decision for GES. The PAB Chair noted it would also be a commercial decision for RECCo and that there is a limitation in what can be done within the current contract period.

Another PAB Member raised the ongoing project Trident system review and queried whether the Code Manager was currently aware of the implications of Trident, noting they did not want the service performance to further deteriorate. The Code Manager advised they would take an action to get an update to try and understand what the potential impact may be and the associated timeline of the review.

The PAB:

- **APPROVED** the proposed recommendation for the delivery of the RTS KPIs review

NEW ACTION: RECCo to provide an update to PAB on the medium-term and long-term plans to tackle persistent performance issues related to GES architecture complexities, including the impact of project Trident.

OB and RT left the meeting.

5. I0180 ASSURANCE UPDATE

The Code Manager presented an update on the assurance options required for I0180. The paper invited PAB to determine the assurance approach to be included in response to the I0180 change consultation.

The Code Manager outlined the background to change I0180 and the rationale behind the four options presented within the paper, noting that two of the four require the Code Manager to provide assurance. These would require the application of Performance Assurance Techniques (PATs) on Parties who fail to respond after a particular agreed period of time. The two remaining options do not require performance assurance. The Code Manager advised PAB that the recommendation contained within the paper is for the approval of risk driver monitoring, allowing the Code Manager to continuously monitor performance and gives a target to meet.

The PAB Chair noted that I0180 is still early in development and the decision being taken today would be the PAB putting forward its recommendation for assurance based on the change proposals. The PAB Chair advised PAB that once the impact assessment is complete, the PAB may revisit their recommendation based on the proportionality of that assessment. The Code Manager confirmed that the responsible committee is the Change Panel itself.

A Supplier Representative PAB Member queried whether it is fair that DCC are unable to cancel or close down queries until the originator has confirmed they can do so. They noted that they see a lot of queries across the industry that are completed but someone has not confirmed it can be closed correctly so are still awaiting closure, as noted in the paper. They queried whether those awaiting closure are in the hundreds or thousands. They also queried whether another step could be including in Option 3 so that the Lead is emailed so they are able to advise that a person may be off on leave, are absent, or have left their employment before it goes to the Code Manager.

The Code Manager advised that they believed the current outstanding cases were in the hundreds and that assurance is an ongoing process. They advised that if they implement and need to ramp up assurance, they could do that, and rather, it is hard to ramp down assurance. They noted that risk driver monitoring comes at no cost essentially to the Code Manager.

The PAB Chair advised that the points raised can be fed back to the Change Management Team for input.

The PAB:

- **APPROVED** the Risk Driver Monitoring, described in Section 3 of the paper, to be applied as the assurance technique to be used in implementing the proposed change.

NEW ACTION: The Code Manager to reflect Supplier Representative feedback on the options being considered within the Service Provider Impact assessment response to I0180 which will be shared with the REC Change Team.

SL left the meeting.

6. PARTY ASSURANCE UPDATE

The Code Manager presented an update on Party Assurance, including observations from the Sprint 4 mid-sprint review and the proposed PATs, as well as an update on the Theft Detection Incentive Scheme for 2024/25.

The PAB:

- **NOTED** the update.

7. DEROGATION APPLICATIONS

EM, GS, and KD joined the meeting.

The Code Manager updated PAB on two Derogation Applications that had been received. The first application was received on 4 July 2025 from the Parties in the Opus Group. At this point, the PAB Chair advised PAB that given the nature of this Derogation, Paul Saker (PAB Member) had declared a conflict of interest with this derogation given his employment with EDF. The PAB Chair determined that PS could remain for the discussion of the Derogation but that he would not take part in the vote.

The Code Manager advised the Derogation relates to the 2024-25 Theft Detection Incentive Scheme (TDIS). Opus has sold a large proportion of its portfolio to EDF, and both organisations wish to transfer the target and confirmed thefts along with the sale.

The Code Manager confirmed that if approved, the Derogation would have no impact on other TDIS Suppliers, only Opus Group Parties and EDF.

The Code Manager advised that while Schedule 7 has provisions in the event of a total sale of a portfolio, it does not accommodate what would happen with a part-sale. They advised that both companies had been working with the Code Manager, in terms of the Theft Analytics team, to work out what that might look like. The detail of this is included in Appendix 1.

The Code Manager confirmed that this would apply to the 2024-25 TDIS only, and that work is ongoing as to what might need to be done for the 2025-26 scheme year as a separate piece of work.

A PAB Member queried whether it is likely, in the longer-term, that PAB would see more of this type of activity and whether it would be worth considering editing Schedule 7 to include explicit provisions to deal with this, rather than having to do it through Derogations in the future.

The Code Manager reiterated that there is a mechanism to deal with the transfer where the whole portfolio is being sold, and that process has been refined overtime. They advised that they do not believe there is a ‘best’ way to do this.

The PAB:

- **APPROVED** the Derogation Application as set out in the paper, including the timescales and recommended conditions.

EM and KD left the meeting.

The second application was received on 21 July 2025 and relates to the requirements placed on the REC Code Manager in Schedule 11, Paragraph 10.2 and the starting of the annual 'Unallocatable transactions' process. The application requests that the start date be moved from July to October to allow the process to be run as effectively as possible.

The Code Manager advised that the request is due to delays in the Prepayment Meter Infrastructure Provider (PPMIP) receiving the central data required for phase one which allows them to match transactions. The Code Manager further advised PAB that R0223 (Reconciliation of Unallocatable transactions review) considers this area, and if approved, would be implemented in September. This would have no impact on the Derogation, but should the change be implemented, it would allow improvements to the process proposed in the change to be realised by the PPMIP sooner.

A PAB Member queried if there would be some form of communication to let Parties know this is happening. They also queried what the impact of deferring the receipts of some of these allocations would be on Parties. The Code Manager confirmed they had communications ready to go out if approval is confirmed by the PAB. They advised that consideration was given to what the delay in payments would be, but they do not believe there would be detriment to Parties or customers given they are three-year old, and it is a cash flow process for Parties.

Another PAB Member noted that this is something that must happen every year and queried whether this was a one-off or it is likely to occur again. The Code Manager advised that a delay like this has not happened under the REC before, but that it did happen under the previous SPAA administration through a similar Derogation. They noted that with R0223, which addresses the need for a derogation, is likely to be implemented in September, so they do not believe the PAB will see something similar in future years.

The PAB:

- **APPROVED** the Derogation Application as set out in the paper.

8. DATA ACCESS REQUESTS

The PAB were presented with a paper from the Code Manager seeking changes to the Electricity Data Access Matrix; the Department for Energy Security and Net Zero (DESNZ) had raised two requests related to regular reporting and a bespoke report to support a meter recall event, and East Lothian Housing Association had raised one request related to Radio Teleswitch Service support.

The Code Manager noted that there had been some discussion previously about taking government departments and government organisations, similar to DESNZ, without having to bring their requests to PAB unless it is beyond the Electricity Data Access Matrix but that this will be for another time.

A PAB Member queried whether government departments / organisations could be able to assist in checking information, such as address management. The Code Manager advised that there is a proposal under consideration for non-REC parties to be able to submit information like that. They noted this was currently being assessed and may be part of a potential change.

The PAB Chair noted the previous discussions that government departments should be assumed to be accepted where they are requesting the same access to data items, as opposed to extending the list of items.

The PAB:

- **APPROVED** the Code Manager's proposed alterations to the Electricity Data Access Matrix; and
- **APPROVED** the Code Manager's implementation date of these changes for **22 August 2025.**

GS left the meeting.

9. QUALIFICATION UPDATE

DR joined the meeting.

The Code Manager presented an update on Qualification activities, as well as an alleged breach of CoMCoP by an Electricity Metering Operative that is being currently investigated. The Code Manager also updated PAB on its intention to publish REC Assessment Criteria for MHHS Qualification v4.1, which has been updated with the latest version of MHHS Business Requirements and Design Requirements, and additionally reflects some agreed changes to the Qualification Requirements-to-Test-Traceability-Matrices (RTTMs).

The Code Manager advised that these changes had been shared with the MHHS working group and noted they had not received any objections from them, therefore, they are asking PAB to note that these changes have been made to reflect the wider changes agreed within the MHHS programme.

A PAB Member queried how these changes will be communicated to Parties. The Code Manager advised that they would inform Parties through both REC and MHHS Programme communication channels, including the REC Portal, the REC Weekly Bulletin, as well as the MHHS Clock.

The PAB:

- **NOTED** the update.

DR left the meeting.

10. PERFORMANCE ASSURANCE OPERATING PLAN 2025-26

The Code Manager presented an update to PAB on the Performance Assurance Operating Plan for 2025-26 further to last month's interactive session feedback and input from various REC Stakeholders. The paper outlined those insights to inform PAB's decision on activities to include within the PAOP for 2025-26 and invited PAB to take a decision.

The Code Manager noted that the format of the PAOP for 2025-26 has changed from previous versions based on the feedback from the PAB and input from various REC Stakeholders. They highlighted key elements within the draft PAOP, including the chosen topics for the quarterly deep dives, with two of these focusing on REC processes and two focusing on REC services.

The Code Manager noted that while PAB Members prioritised a deep dive review into objections and whether the objection processes are working or not, Parties deemed a deep dive review of the escalation processes a priority. The Code Manager advised that, in this instance, they have proposed to go with the Parties recommendation to focus on the escalation processes with a view of identifying opportunities to improve existing processes, so fewer escalations are required. In terms of the objection deep dive, the Code Manager confirmed this will still be touched upon as an element of its review of critical REC changes, including through how effective R0155 has been.

The Code Manager also noted positive feedback from DCC on the approach to deep dives over the last year, noting these had worked well and helped DCC identify opportunities for improvement.

The Code Manager noted that the PAB was being asked to approve Appendix B (PAOP) to allow them to issue this for further consultation with REC Parties to close the loop and ensure Parties are happy

with it and the timeline of it. The Code Manager intends to come back to the PAB in August to have this ratified.

A PAB Member commented that they found the interactive session held at the June PAB meeting useful and liked the updates to the PAOP format presented in Appendix B. They suggested that it may be helpful if the Code Manager incorporates both the outcome and benefits that are being sought from planned activities in Appendix B. The Code Manager confirmed it would add this before sharing the PAOP for wider consultation later in the week.

The PAB Chair noted that it would be helpful to capture the five recommendations that were recently accepted by the REC Board to ensure they are feeding into this PAOP and to, more formally, recognise them. The Code Manager noted that these could be incorporated within a narrative document to provide linkage as some of them can be covered by performance assurance and others can't.

The PAB:

- **APPROVED** the Performance Assurance activities to be planned for 2025-26.
- **APPROVED** the draft timetable for those activities for further consultation and refinement before the final PAOP is presented to PAB for approval at the August meeting.

NEW ACTION: The Code Manager to add intended outcome/benefit within the PAOP 2025-26 and link to the REC Board recommendations from the annual report.

11. OPERATING PLAN

The Code Manager updated PAB on the Operating Plan, detailing the intended actions between now and the start of the new Performance Assurance Operating Plan 2025/26 from September.

The PAB:

- **NOTED** the update.

12. PARTY ANNUAL RATING

The Code Manager presented an update to the PAB on the Party Annual Rating Decision, where the criteria approved in June 2025 was applied to the performance data to validate if the criteria have the expected effect. A minor change in the criteria was approved, to reflect all of the escalation and remediation PATs within the Performance Assurance Methodology and Techniques document. The Code Manager advised PAB of the next steps for the query window before ratings are published.

The Code Manager noted that given the importance of the Annual Rating, they are keen to work with the PAB step by step through the process, but also directly with Parties too. This builds in a number of controls before the Annual Rating is issued and allows the Code Manager to do a dry run of the criteria to ensure any unexpected issues are dealt with at that point before issuing ratings to Parties.

The Code Manager noted that the dry run of the criteria worked, with one exception. This has resulted in the Code Manager seeking a slight change to the criteria. A key element of the criteria was for Parties who have had more severe performance issues, they would attract a more severe rating. One Party is an exception to this given they have been reasonably severe for some time, with no other Party previously being in this position. The Code Manager advised the PAB that the change they are seeking to make would add this into the criteria, and thus treat this Party fairly. The Code Manager noted that

whilst the Party's performance has been problematic in this period, they have seen an improvement and hope that they are performing much better next year.

The Code Manager advised PAB that the only other observation they had was that there is one set of organisations who have been rated poorly for two years in a row, with no evidence of actions to improve. As such, the Code Manager has proposed to PAB to publish their ratings but also request they come to PAB to explain their rating and the steps they will take to improve performance going forward.

A PAB Member queried whether the Code Manager had communicated with the Board or Chief Executive's of those Parties rated as 'Severe Weaknesses'. The Code Manager advised they hadn't as they provide this via Contract Managers, but they did agree it would be a sensible step for those Parties in the worst category to have additional communications, including writing out to others within the organisation so that it doesn't just go to the Contract Manager. Various PAB Members noted their agreement with this approach, with one noting they would be in favour of seeking evidence of internal escalations. The PAB Chair noted that he is happy to be included in the CC of these letters.

A RECCo Representative queried the escalation process and whether the Code Manager had thought through what actions they would be able to track to make sure that there is an improvement in performance. The Code Manager reiterated the approach of providing each individual Party with their rating, with further communication with those rated 'Severe Weaknesses'. As discussed, they will also write to more senior individuals within those Parties rated as 'Severe Weaknesses' based on the feedback from PAB Members. Additionally, those proposed to the PAB will be invited to discuss why there is a lack of engagement, including on theft.

The PAB:

- **APPROVED** updating the criteria to include the two remediation PATs.
- **APPROVED** organisations with repeated Severe Weaknesses requested to attend the PAB, as set out in the paper.

NEW ACTION: The Code Manager to implement increased communications for Parties rated 'Severe Weaknesses' in the Annual Rating 2025-26.

13. AOB

The Code Manager reminded PAB Members of the MHHS Upskilling Session for Committee Members being held by the Code Manager teams on Thursday 31 July 12-2pm.

The PAB Chair circulated a link to the annual stakeholder satisfaction survey which was published last week and can be found here.

The PAB Chair advised they had sought an update from the DNO raised at the last PAB, in relation to the ongoing operational dispute but had not heard back. The Chair agreed to ask for regular updates for PAB.

The PAB Chair noted it had been some time since the PAB were updated on the reprocurement of the Performance Assurance services. It was agreed that RECCo would be asked for an update ahead of the next scheduled PAB meeting in August.

The PAB Chair advised they would bring updates to the next PAB meeting in relation to the Actions on the Data Use and Access Act and the impact on two programmes – Consumer Consents and Tariff Interoperability. The PAB Secretary shall include time within the August agenda for this.

The PAB Chair noted that the September PAB meeting will be held in-person.

14. NEXT MEETING DATE

The next meeting of the PAB will be held online on 26 August 2025.