RETAIL ENERGY CODE

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RECCO DIGITALISATION STRATEGY UPDATE: ADDRESSING FAILURE DEMAND DRIVING AUTOMATION SANDBOX REQUESTS

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FOR INFORMATION



This paper provides an update (action RECPAB_25_1125_02) on how RECCo's digitalisation strategy is addressing failure demand that has contributed to Sandbox requests for bespoke SDEP robotics/automation.

REC PAB members are invited to **NOTE**:

- Sandbox requests for SDEP robotics reflect underlying user pain points and failure demand.
- RECCo's strategic direction is to remove root causes through API-first, machine-to-machine (M2M) integration enabled by the API Gateway, rather than screen-led automation.
- Key milestones: REC Portal Relaunch go-live Sep 2026; Enquiry Services go-lives GES Jul 2027 and EES Jul 2028.

1 PURPOSE

This paper is provided to the REC PAB for information in response to action RECPAB_25_1125_02.

It acknowledges why recent Sandbox requests proposing SDEP robotics/automation have arisen, and how RECCo's digitalisation strategy and delivery roadmap will provide a more sustainable path that avoids Parties investing in workarounds that may not endure.

2 CONTEXT: FAILURE DEMAND, SANDBOX REQUESTS, AND ROLES

Parties have highlighted that some current SDEP journeys require repeated manual interactions to achieve outcomes. Where needs are not met at first request, this drives repeat contact, rework and operational workarounds.

In that context, Sandbox requests have been raised proposing bespoke robotic process automation around SDEP. RECCo recognises the underlying need these requests are seeking to address: faster, more reliable, programmatic interaction with REC services.

Most robotics proposals address symptoms rather than root causes. They risk brittleness, increased operational burden, and additional security/assurance considerations.

The strategic direction is digitalisation and machine-to-machine communication, in effect, fit-for-purpose, governed programmatic capabilities rather than automation of manual user journeys.

3 DIGITALISATION STRATEGY AND DELIVERY ROADMAP: WHAT CHANGES THE EQUATION

RECCo's digitalisation strategy is focused on removing the root causes of failure demand by shifting the need from screen-led workarounds towards secure, standards-based machine-to-machine (M2M) integration. A governed API Gateway provides the consistent front door for programmatic interaction, enabling sustainable integration patterns across REC digital services including the REC Portal Relaunch.

The API Gateway is key here because it enables a consistent approach to:

- controlled access and policy enforcement,
- predictable integration behaviour,
- operational controls, and
- structured API lifecycle and versioning.

These characteristics directly address common pain points that drive robotics proposals, by enabling Parties to integrate once against governed interfaces rather than automate user journeys that are expected to evolve.

RECCo's Design Principles and Policies reinforce this direction. We are committed to good API design aligned to user journeys and minimise the number of calls needed to complete a journey, with appropriate documentation and reliability practices to reduce errors and rework.

3.1 SYNERGY WITH ENQUIRY SERVICES AS A PRACTICAL PATHWAY TO REDUCE PAIN POINTS

- The Enquiry Services evolution is designed on a gateway-led, API-first architecture that uses shared integration patterns, security governance, gateway controls and operational tooling, with explicit support for version-managed APIs and backward compatibility controls.

- In particular, the Enquiry Services approach includes dedicated effort to support adoption of Enquiry Service APIs via the Kong API Gateway in line with RECCo's migration plan from May 2026 to July 2027.
- This creates a clear strategic alternative to robotics that is evidence-led and reduces repeat manual steps by moving users toward durable programmatic integration.

3.2 WHAT WE ARE DOING NOW

- Alongside platform delivery, RECCo is targeting the specific failure-demand drivers behind these Sandbox requests by:
    - prioritising stability and clarity in service operations and change communications,
    - improving guidance and support around high-friction journeys, and
    - capturing the underlying SDEP automation requirements as programmatic needs.

3.3 DELIVERY ROADMAP AND KEY DATES

- The delivery roadmap below is the key reason RECCo is cautious about Parties investing in bespoke robotics against the current set-up. Interaction patterns and interfaces will evolve, and robotics built on current journeys will likely require redevelopment.

Timeline

Date	Enquiry Services Timetable	Existing Sandbox timetable
May 2026	REC Portal Relaunch soft launch	
Sep 2026	REC Portal Relaunch go-live	
By Jul 2026:	Enquiry Services contract award	Access suspension functionality built in SDEP
Apr 2026-Sep 2026	Enquiry Services gateway pre-migration window	
Aug 2026-Nov 2026		Access baseline monitoring
Dec 26		Robotics trials start
May 2026-Jul 2027	Targeted support to drive adoption of Enquiry Services APIs via the Kong API Gateway	Robotics trial ends, Code Change development in process
Jul 2027	GES go-live	Earliest likely change to the REC to enable robotics
Jul 2028	EES go-live	

- The REC Portal Relaunch includes delivery of an API Gateway Service Wrap and explicitly positions this as readiness for onboarding and operating services consistently, supporting standardisation and scale for programmatic interaction across the REC digital estate.

3.4 LONG-TERM DIRECTION IS TO REDUCE ROBOTICS REQUESTS THROUGH DURABLE PROGRAMMATIC CAPABILITY

RECCo's long-term intent is that Parties should be able to meet underlying outcomes through appropriate, governed, supportable programmatic mechanisms, rather than by automating UI journeys. The API Gateway-led model provides the foundation for this approach.

4 SUMMARY

RECCo acknowledges the current customer experience issues that sit behind these sandbox requests. The goal of the approach set out above is to reduce failure demand by tackling root causes and providing a clear migration path to durable programmatic integration.

If Parties invest in bespoke robotics now, the likely impacts are:

- The risk of rework through robotics tied to current journeys is likely to require redevelopment as the enquiry services and portal relaunch programmes lands and as services increasingly standardise around API-first/Gateway-led integration.
- Fragmentation through multiple bespoke automations creating uneven outcomes across Parties and increasing complexity for support, assurance, and change management.
- Increased operational risk as user interface automation is typically more brittle than API integrations, and it bypasses the standard controls the Gateway pattern provides, such as policy enforcement, observability, audit trails, throttling, and structured versioning.

If Parties align to the strategic direction, the benefits are:

- Lower failure demand over time by removing the need for repeated manual steps and rework through more reliable, well-documented programmatic interaction and API reliability practices.
- More predictable change through controlled evolution via versioning and gateway-led controls reduces breakage and improves integration stability.
- Clear migration pathway involving the May/Sep 2026 Portal milestones and the Enquiry Services migration/adoption window provide the basis for coordinated industry transition planning, reducing duplicated investment.

5 NEXT STEPS

On this basis, we recommend that the approved approach to RECSANDBOX_02 and RECSANDBOX_03 to trial the use of robotics is not progressed to avoid wasted effort developing a solution that will shortly be decommissioned. We acknowledge the need articulated by Parties and intend instead on meeting this need through improved API access.

RECCo will:

- continue engaging with Parties through its programmes to understand pain points and translate these into durable requirements as designs evolve;

- provide evidence and technical context to support Code Manager in applying the Sandbox process properly and transparently; and
- if helpful, provide further updates to PAB as the Portal Relaunch and Enquiry Services programmes progress and milestones are confirmed.
- arrange for the Code Manager to liaise directly with the applicants to inform them of the updated position on their sandbox application.
- arrange for the Code Manager to update the sandbox register, so that all organisations are aware that this sandbox application will not progress.

REC PAB ACTION



REC PAB members are invited to **CONSIDER** whether both RECSANDBOX_02 and 03 based on the recommendation above. The Code Manager will communicate with the affected organisations and update them on the steps being taken to improve digital access.