RETAIL ENERGY CODE

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MEETING MINUTES

MEETING	**RECPAB_26_0728**
DATE	**28 July, 10:00am**
LOCATION	**Online via 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
Anne Jackson	UNC Representative	AJa	PAB Member
David Brown	MEM Representative	DBr	PAB Member
Fungai Madzivadondo	DNO Representative	FM	PAB Member
Shiv Singh	GT Representative	SSi	PAB Member
Simon Waltho	BSC Representative	SW	PAB Member
Harry Jones	SEC Representative	HJ	SEC Representative Alternative
Scott McPhillimy	Ofgem	SMcP	Ofgem Representative
Jess Collins	Citizens Advice	JC	Citizens Advice Representative
Anton Moden	Code Manager	AMo	Performance Assurance Lead
Andrew Waghorn	Code Manager	AWa	Performance Assurance Analytics Lead
Daniel Rodgers	Code Manager	DR	Performance Assurance Manager
Tanya Mason-Hawes	Code Manager	TM	PAB Secretary
Kat Higby	RECCo	KH	Assurance Integration Lead
Joy Nnanami	RECCo	JN	Assurance Manager
Carrie Shannon	RECCo	CS	Project Manager
Kevin Redmond	Moorhouse	KR	PAB Observer
Lewis McKenzie	Moorhouse	LMcK	PAB Observer
Becca Fox	Moorhouse	BF	PAB Observer
Lorna Mallon *(for item 3)*	Code Manager	LMa	Principal Regulatory Consultant
Sasha Shipulina *(for item 4)*	NESO	SSh	Head of Data Sharing Infrastructure and Sector Digitalisation
Nathan Gould *(for item 4)*	RECCo	NG	Enterprise Architect
Chris Thompson *(for item 5)*	Code Manager	CT	Operational Account Manager

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1. REVIEW OF OPEN ACTIONS AND APPROVAL OF DRAFT MINUTES

The Chair welcomed attendees to the meeting of the PAB. Apologies were given from Shelley Rouse (Operational Account Manager), and Paul Everett (Supplier Representative).

The PAB unanimously **APPROVED** the actions and draft minutes from the PAB meeting held on 30 June 2026. PAB Members reviewed the open and overdue actions. One action was closed following information provided via a verbal update.

2. UPDATE ON CODE MANAGER EVOLUTION PROJECT

RECCo provided an update on the Code Manager Evolution project and preparations for the interim Performance Assurance service from 1 September 2026. Progress was reported across the three workstreams.

The PAB was advised that the Strategic Products include the Performance Assurance Strategy, the Risk Register, the Performance Assurance Operating Plan and the Performance Assurance Methodology. Consultation on the Risk Register and Performance Assurance Operating Plan opened on 10 July and closed on 24 July. Initial feedback received from Parties and other interested stakeholders was under review. It was noted that, due to consultation timings, a full summary of responses could not be presented at the meeting. A separate paper will be prepared for PAB during the week commencing 3 August, summarising the feedback received and explaining how it will be addressed. Following this, approval will be sought to publish the finalised documents for use from 1 September. RECCo confirmed that handover discussions were already taking place to ensure open observations and ongoing risk-related matters transfer into the new service model. In particular, the updated risk thresholds will be reflected in version 6 of the Risk Register, including matters relating to the Change of Occupier flag.

The PAB was informed that workstream 2 remains active, with significant collaboration taking place between RECCo and service providers. Business processes are being reviewed and validated through workshops to ensure that all parties understand the new model, identify any gaps, and resolve areas of inconsistency or confusion. A collaboration day held on 2 July was noted as a positive session, enabling service providers to understand RECCo's expectations and approach to the new outcome-focused service model. The RECCo Assurance Manager thanked those involved for their engagement and participation.

Recruitment activity is ongoing, with interviews taking place. It was recognised that there is a risk the enduring resource may not be in place by 1 September. RECCo is therefore mapping the PAB year, with particular focus on the first few months, to ensure key activities, papers and attendees are identified and can be supported if recruitment is not complete by go-live. A PAB Member queried whether delays in appointing secretariat resource were due to the timing of the recruitment process or availability of suitable candidates and that, given the scale of change, it would be preferable for the required resource to be in place from day one. RECCo explained that the delay was due to a combination of factors, including the need for the resource to support both PAB and the next iteration of change-related work, as well as the impact of the summer period on recruitment. Further, RECCo confirmed that they are considering interim resource options to mitigate any service or capacity gap from 1 September.

The mobilisation and transition coordination workstream is focused on transferring activities from the current to new service providers. The current service provider has supported handover sessions, workshops and business process validation sessions. The PAB was informed that readiness assessments are now being undertaken with service providers and RECCo. These assessments use readiness criteria and evidence requirements to understand the extent to which each party is prepared for go-live. Any gaps identified are being addressed through additional focus and support.

A PAB Member asked whether key risks, mitigations or alternative plans should be made clearer to PAB, particularly in relation to seasonal and resourcing challenges. RECCo confirmed that additional resource, focus and working sessions have been put in place where concerns have been identified, and that there is currently no risk to the 1 September go-live date. Further, RECCo noted that they will include a clearer summary of key risks, mitigations and actions taken to address potential issues in a future project update.

RECCo invited PAB to consider future reporting preferences under the new service model, noting that RECCo will receive monthly data from service providers on areas including Party Assurance, Market Entry and Qualification. Members agreed that the current reporting frequency remained appropriate, subject to RECCo and suppliers promptly escalating any matters requiring attention outside normal cycles. PAB also emphasised the need for future reports to provide clear context, materiality and impact, particularly in relation to the market, service providers and customers.

The PAB:

- **NOTED** the update.
- **DISCUSSED** the regular PAB reporting and any improvements or changes that can be made going forwards.

3. ADDRESS PRIORITISATION MATRIX

LMa joined the meeting.

The PAB considered a request for approval of a Category 3 change relating to the Address Prioritisation Matrix, following the paper presented at the previous meeting. The change supports targeted prioritisation of unmatched electricity registration data provided by DCC to DNOs and iDNOs, enabling parties to focus activity more efficiently and allowing assurance arrangements to be applied.

The consultation ran for three weeks and received five responses. Feedback was generally positive, with some comments incorporated into the approach, including the creation of a new outcome status for reporting purposes where additional information is required. It was noted that further stakeholder engagement would be needed ahead of implementation.

The legal text is due to take effect on 1 September, with supplier MPANs expected to be issued in mid to late September. Data will then be collated and shared with DNOs, who will be subject to SLAs based on the size of the files provided. A portal issue had incorrectly shown the implementation date as approval date; this has now been corrected and affected parties have been informed.

A PAB Member questioned whether parties had sufficient clarity on the process, requirements and SLAs. The Code Manager confirmed that a webinar, guidance document and FAQs are planned, subject to approval, and that updates will also be shared directly with relevant stakeholders to support less engaged parties. DNOs have already received early sight of data, with a further data share planned in August to help reduce backlog and identify records that should be excluded from future reporting.

The PAB Chair asked for clarification on the categorisation. The Code Manager noted the Category 3 classification as mandatory and assurable, while allowing flexibility to amend reporting, categorisation and SLAs quickly without being tied to the standard change release cycle. However, further clarification was received following the meeting:

Post-meeting clarification: R0283 introduced the Address Prioritisation Matrix to Schedule 6 clauses 7.24-7.27 setting out the activities required and the prioritisations. It is clause 7.24(a) that states that the activities listed within the APM must be undertaken by Parties and that is where the mandatory requirement is. Schedule 1 was updated, with the Address Prioritisation Matrix as "Matrix

setting out the SLA's and prioritisations for resolving individual REL data quality categories. The SLAs will apply to ERDS, GRDS and Suppliers. The matrix may be updated as per the Performance Assurance Schedule, clause 7.26". As such, although the Address Prioritisation Matrix is a Category 3 document, it is set out within Schedule 6 that this is a mandatory requirement.

The Code Manager noted that similar work is expected to follow for gas, including invalid postcodes and plot addresses, although this has taken longer due to data availability. Related work under change I0200 is also underway to address interpretation issues and support standardisation, with assurance remaining central to the approach.

The PAB:

- **APPROVED** the Code Manager recommendation to populate the Address Prioritisation Matrix based on invalid postcode categorisation and service.

LMa left the meeting.

4. DIGITALISATION

SSh and NG joined the meeting.

Representatives from National Energy System Operator (NESO) and RECCo presented the collaborative work between RECCo, Elexon, and NESO on the sector architecture reference framework, outlining the strategic objectives, technical architecture, and future interoperability model.

NESO explained that the framework is grounded in Department for Energy Security and Net Zero and Ofgem digitalisation policy, aiming to create a coordinated, interoperable digital ecosystem to support a smarter, more flexible energy system.

The team developed a taxonomy of interoperability rules and a logical architecture distinguishing between consent-managed, platform-shared, and directly shared data, with a future model introducing a federated trust framework to enable scalable, governed data sharing.

NESO clarified that the work is being conducted on behalf of Ofgem, with critical stakeholders engaged for feedback, but the outputs remain confidential until Ofgem's public consultation in autumn.

In response to PAB questions, NESO confirmed that risk annexes are included, addressing data quality and dependencies, and that the digitalisation coordinator will eventually govern transitions, with interim governance provided by existing domain coordinator boards.

The PAB:

- **NOTED** the update.

SSh and NG left the meeting.

5. ADDITION OF NEW CATEGORIES TO THE DATA ACCESS MATRICES

CT joined the meeting.

A Code Manager Operational Account Manager proposed the creation of a new category for white label tariff providers (WLTP) in the electricity and gas data access matrices, following a recent application and identification of a gap, with the group discussing the rationale and voting to approve the change.

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The Code Manager representative explained that WLTPs, which sell energy tariffs under their own brand but rely on licensed suppliers, require access to data for customer support and switching, prompting the proposal to add them as a category with similar access rights as suppliers.

A PAB Member question the status of the Data Access Process paper that was due at PAB in June but was delayed to the Ofgem Open Data Consultation. It was discussed that there would not be sufficient time for a decision and outcome to be brought to the August meeting, but that the Code Manager would determine the RECCo owner to take this forward.

NEW ACTION: The Code Manager to determine the RECCo owner of the clarification of the scope, nature and extent of the assurance required to ensure data is used and passed through the supply chain by Energy Consultants in line with the use case approved by PAB, including how costs are charged and recovered.

The PAB:

- **APPROVED** the Code Manager's proposal to add the new category to the Data Access Matrices.

CT left the meeting.

6. PARTY ASSURANCE UPDATE

The Code Manager presented the proposed thresholds for risk drivers 8.12 and 8.13, which monitor Suppliers' use of the change of occupier flag when raising switch requests. The thresholds were proposed following a review of industry performance, which showed that most Parties used the flag at very low levels, while a small number had significantly higher usage. A 20% threshold was proposed for both domestic and non-domestic monitoring, with a minimum activity level of 100 successful switches per month. The thresholds are intended to support targeted engagement with Suppliers whose performance is significantly outside normal market behaviour, rather than to treat every threshold breach as a compliance issue.

The Code Manager further updated the PAB on the monthly data review cycle, which identified 20 threshold breaches across risk drivers. As this was a non-active month, notification paths were applied in line with the Performance Assurance Methodology and Techniques document.

The Code Manager noted a Party that had responded to a previously issued PAT and no further escalation was proposed. Engagement with another Party also continued in relation to the non-submission of the MOA portfolio report, with no further escalation proposed at this stage due to progress made and ongoing cooperation.

PAB Members were informed that a new Annex 5 to the MHHS Qualification Approach and Plan had been developed to support the removal of legacy market qualifications. The paper was for information only and did not introduce new REC obligations, assurance processes or responsibilities for the REC Code Manager.

PAB Members were also updated on a major Data Integration Platform incident on 13 July, which affected users' ability to send and receive messages and may impact parties' ability to meet required timeframes for REC processes. The impact will be considered in the September data review, with continuity discussions held with the incoming Performance Assurance Service Provider.

The Code Manager reported that draft annual ratings had been applied to market participants in line with the agreed criteria and shared with parties for review. The full list was included in the paper, alongside a summary of the six largest suppliers. The draft ratings for those suppliers had worsened overall, primarily due to poorer theft performance by two organisations and a substantial delayed payment by one organisation. A PAB Member raised their concern about the number of Parties

requiring improvement and asked how the ratings could be better linked to the scale of customer impact. Another PAB Member also highlighted the importance of connecting ratings to consumer outcomes, particularly if rating information is to be made more public. PAB Members discussed the importance of providing appropriate context for ratings, including whether poor performance reflects material consumer harm and what actions are being taken to drive improvement.

The Code Manager noted that confirmed theft volumes appeared to have reduced for the first time during the lifetime of the REC, and suggested that this may require further analysis to understand whether this reflects reduced theft levels, changes in smart meter penetration, or limitations in current assumptions and methodology.

The PAB Chair confirmed that the theft estimation methodology had not been updated since 2022 and that a future refresh is planned, subject to securing richer data sources. New data, including consumption data and smart meter tamper alerts, could support more targeted analysis and help test whether existing assumptions remain valid. A PAB Member asked whether smart meter tamper alerts had been analysed by type, volume and demographic profile. The PAB Chair confirmed that this work is not currently active but remains an area of interest, particularly in relation to improving theft analytics and sharing useful insights across suppliers. PAB Members discussed the potential value of restarting focused theft discussions or using the existing REC Issues Group to consider theft-related matters, including best practice sharing and the interaction between incentive arrangements and supplier willingness to share effective targeting approaches.

The PAB:

- **APPROVED** the thresholds for Risk Drivers 7.27, 8.12, and 8.13 are included in Retail Risk Register v6.0.
- **NOTED** the PATs applied by the Code Manager in line with the Performance Assurance Methodology and Techniques Document.
- **NOTED** the publication of Qualification Approach and Plan Annex 5.

7. AOB

No items were noted.

NEXT MEETING DATE

The next meeting of the PAB will be held in-person on 25 August 2026.

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