RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

| | |
|---|---|
| 01 | Proposal Plan |
| 02 | Consultation |
| 03 | Final Recommendation |

# CHANGE REPORT

## R0307 – RELEASE AND LICENSING OF THE COMCOP LOGO FOR ACCREDITED PARTIES

| | |
|---|---|
| DOCUMENT VERSION | V1.0 |
| PROPOSED IMPLEMENTATION DATE | 26 June 2026 |
| IMPLEMENTATION APPROACH | Big Bang |

| | | | |
|---|---|---|---|
| RESPONSIBLE COMMITTEE | Change Panel | CHANGE PATH | Self-governance |
| PRIORITY STATUS | Low | URGENCY | Standard |
| IMPACTED STAKEHOLDERS | AMR Service Providers, Metering Equipment Managers | | |

| LEAD ANALYST (SOLUTION LEAD) | TECHNICAL LEAD | ASSURANCE LEAD | SUBJECT MATTER EXPERT |
|---|---|---|---|
| FLO MONEA | POPPY PARK | ANTON MODEN | CHRISTOPHER THOMPSON |
| Click to send an email | Click to send an email | Click to send an email | Click to send an email |

## OVERVIEW

This Change Proposal is seeking to make the CoMCoP logos available for use under licence.

## CODE MANAGER RECOMMENDATION

The Code Manager minded to position is to recommend that the REC Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 26 June 2026.

RETAIL ENERGY CODE

CONTENTS


1 Summary ..... 3
2 Problem Statement ..... 3
3 Impacts ..... 3
4 Cross-Code Impacts ..... 4
5 Proposal Plan ..... 4
6 Priority Status and Urgency ..... 4
7 Proposed Solution ..... 4
8 Draft Legal Text ..... 5
9 Risks, Assumptions, Issues and Dependencies ..... 6
10 Business Case Assessment ..... 6
11 Case for Change ..... 7
12 Appendix ..... 7
13 Glossary ..... 7

# BACKGROUND

## 1 SUMMARY

Although a Consolidated Metering Code of Practice (CoMCoP) logo was trademarked prior to the launch of the CoMCoP in April 2023, the logos have not yet been made available for use. This delay was due to the decision to await the implementation of R0152 Revision to the Consolidated Metering Code of Practice (CoMCoP). In the interim, materials in public circulation still display logos from the previous (pre-CoMCoP) Codes, and Parties certified or Qualified under CoMCoP do not have a logo to display on their marketing materials to demonstrate their status.

The absence of an official, widely available CoMCoP logo undermines the visibility and credibility of the Accreditation scheme. This gap perpetuates confusion among Consumers and stakeholders, allows outdated branding to persist, and fails to reward Parties who have invested in meeting the highest standards of metering practice. Without a clear Accreditation mark, the benefits of CoMCoP certification are not fully realised or recognised in the marketplace.

## 2 PROBLEM STATEMENT

The lack of a visible Accreditation mark risks eroding Consumer trust and confidence, as there is no straightforward way for Consumers to identify Accredited Parties. This situation may also discourage Parties from seeking or maintaining Accreditation, as the benefits are not sufficiently visible or valued. Furthermore, it increases the risk of misrepresentation and reputational harm to both RECCo and Accredited Parties.

## 3 IMPACTS

| CONSUMERS |
|---|
| All consumers |

| REC SERVICE PROVIDERS |
|---|
| AMR Service Providers |

| RECCO / REC CODE MANAGER |
|---|
| REC Performance Assurance |

| REC PARTIES AND SERVICE USERS |
|---|
| No impact |

| REC DOCUMENTS / PRODUCTS |
|---|
| Schedule 1 – Interpretations and Definitions Schedule |
| Schedule 15 – Metering Accreditation |

| MHHS |
|---|
| No impact |

## 4 CROSS-CODE IMPACTS

No cross-code impact has been identified.

## 5 PROPOSAL PLAN

| Milestone | Activity | From | To |
|---|---|---|---|
| **Change Proposal** | | **09 Feb-26** | **21 Apr-26** |
| | Business Case Assessment | February | March |
| | Consultation | March | March |
| | Solution Refinement | March | April |
| | Final Determination | April | April |
| **Voting** | | **21 Apr-26** | **21 Apr-26** |
| | Appeal Window | 21 April | 06 May |

Due to the low level of scope and complexity of this Change Proposal, the Code Manager is proposing for R0307 to proceed to consultation, without the need for a Party impact assessment.

## 6 PRIORITY STATUS AND URGENCY

### PRIORITISATION MATRIX

| Category | Significance / Resource impacts / Urgency | Further selection / breakdown | Score (0-3) | Weighting | Weighted Score |
|---|---|---|---|---|---|
| **Impacts** | Consumer Impact | Indirect | 1 | 27 | 27 |
| | Retail Markets Impact | Innovation and Market Arrangements | 0 | 17 | 0 |
| | RECCo / REC Party / REC Service Provider Impact | Operational Effectiveness and Efficiencies | 0 | 7 | 0 |
| | | Legal and Regulatory Compliance | 0 | 14 | 0 |
| **Resource** | Complexity / Effort / Duration | | 3 | 9 | 28 |
| **Strategic Alignment** | Contribution to/ Alignment with the objectives of the REC | | 1 | 17 | 8 |
| | Contribution to/ Alignment with RECCo's Forward Work Plan | | 2 | | 17 |
| **Urgency** *(The need to progress a change to meet a targeted date)* | | Other Planned Activity | 1 | 10 | 10 |
| | | | | Overall Priority Score (rounded) | 89 |

| | |
|---|---|
| Priority Status | LOW |
| Change Proposal Type | STANDARD |

The overall priority score of R0307 is 89, with a ‘Low’ priority status.

# SOLUTION

## 7 PROPOSED SOLUTION

This Change Proposal is seeking to release and make available the CoMCoP logos to all eligible Parties under a robust and well-governed licensing framework. This will ensure that only those who meet the required standards can use the logo, protecting its integrity and value. The logo should be actively promoted as a hallmark of quality, with clear guidance and enforcement

mechanisms to prevent misuse and to maximise its positive impact on market behaviour and Consumer outcomes.

Introducing the CoMCoP logo will build greater trust and confidence among Consumers by offering an easily recognisable Accreditation mark. This logo will promote transparency and assist Consumers in identifying Parties that meet CoMCoP's standards. By making it clear which Parties are Accredited, the CoMCoP logo should help clarify the market and support Consumers in making informed decisions. The logo's availability to all relevant market segments, will further enhance its value and reach.

The introduction of the CoMCoP logo is a timely and strategically important step that will support awareness, compliance, and Consumer protection as the market evolves. This change proposal is directly linked to two significant previous and ongoing change initiatives within the REC framework: 1.

- R0152 Revision to the Consolidated Metering Code of Practice (CoMCoP): The implementation of R0152 was a necessary prerequisite for this proposal. R0152 addressed foundational changes to the CoMCoP, ensuring that the regulatory and operational environment was suitably robust to support the introduction of new Accreditation marks such as the CoMCoP logo. Without the clarity and structure provided by R0152, it would not have been possible to proceed with the controlled release and licensing of the logo.
- I0278 Establishing the Safe Isolation Provider (SIP) as a Standalone REC Metering Party: This proposal is also strategically aligned to the implementation of I0278, which aims to introduces the SIP as a standalone REC Metering Party. The launch of the CoMCoP logo will play a vital role in raising awareness of CoMCoP Accreditation standards across the market, particularly as new SIPs and other Accredited Parties begin to operate under the revised framework. By providing a clear, recognisable mark of quality, the logo will help stakeholders and Consumers identify Accredited Parties, support communications and engagement activities, and reinforce the importance of compliance with CoMCoP standards. This increased visibility is essential for a smooth transition to the new arrangements under I0278, and will help ensure that the benefits of the change (such as improved safety, Consumer confidence, and market clarity) are fully realised

## 8 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0307 can be found [here].

Changes to Schedule 1 Interpretations and Definitions are being proposed to introduce three new definitions:

- CoMCoP Logo Trade Mark;
- CoMCoP Logo; and
- Conflicting Brand.

Changes to Schedule 15 Metering Accreditations are being proposed to introduce CoMCoP Logo requirements as well as the introduction of a new Annex A: CoMCoP Logos.

# PRELIMINARY ASSESSMENT

## 9 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

### 9.1 RISKS AND ISSUES

No risks or issues have been identified.

### 9.2 ASSUMPTIONS AND DEPENDENCIES

No assumptions or dependencies have been identified.

## 10 BUSINESS CASE ASSESSMENT

### 10.1 COSTS

There are no costs associated with the progression and/or progression of R0307.

### 10.2 BENEFITS

| INTANGIBLE BENEFITS | BENEFITS DESCRIPTION |
|---|---|
| MARKET CLARITY AND CONSISTENCY | The absence of a unified, Accredited logo has resulted in the continued use of outdated branding, which can confuse Consumers and undermine the visibility of current standards. Launching the CoMCoP logo will ensure that all Accredited Parties present a consistent, recognisable mark of quality, supporting a level playing field and reducing the risk of misrepresentation. |
| CONSUMER TRUST AND CONFIDENCE | In a market where trust is paramount, a visible Accreditation mark provides Consumers with immediate reassurance that they are engaging with Parties who meet rigorous, up-to-date standards. The logo acts as a quick reference point for Consumers, helping them make informed choices and fostering greater confidence in the market as a whole. |
| RECOGNISION AND INCENTIVE FOR ACCREDITED PARTIES | Accredited Parties have invested in meeting CoMCoP standards. The logo serves as a tangible reward and public recognition of their commitment to quality and compliance. This visible differentiation incentivises ongoing compliance and encourages others to seek Accreditation, raising overall standards across the sector. |
| MITIGATION OF REPUTATIONAL RISK | Without a controlled, official logo, there is a risk of unauthorised or misleading use of branding, which could damage the reputation of |

| | |
|---|---|
| | both RECCo and Accredited Parties. The proposed licensing and governance arrangements provide clear mechanisms for enforcement and withdrawal of rights in the event of misuse. Incorporating the logo into the REC, with robust legal and procedural backing, ensures that its use is properly governed and protected. |

## 11 CASE FOR CHANGE

### SELF GOVERNANCE

The Code Manager considers there is a positive case for change for implementing this Change Proposal on the basis that the proposed solution:

- Is both viable and implementable, and effectively resolves the problem statement;
- Has no associated central systems costs or any associated Party costs;
- Has minimal effort required for implementation; and
- Delivers positive indirect outcomes for Consumers by providing reassurance that they are engaging with Parties who meet rigorous and up-to-date standards.

## 12 APPENDIX

| | |
|---|---|
| **CHANGE PROPOSAL** | Link |
| **LEGAL DRAFTING** | Link |
| **RELATED CHANGE(S)** | R0152 Revision to the Consolidated Metering Code of Practice (CoMCoP)<br>I0278 Establishing the Safe Isolation Provider (SIP) as a Standalone REC Metering Party |

## 13 GLOSSARY

| TERM | DEFINITION |
|---|---|
| Accreditation | means the process by which each Meter Asset Manager, Meter Operator Agent, Approved Meter Installer, Electricity Metering Operative and AMR Service Provider is recognised as fulfilling the requirements of the CoMCoP which are applicable to their role, which may include an audit process in accordance with the Metering Accreditation Schedule. "Accredited" and similar expressions shall be interpreted accordingly. |

| | |
|---|---|
| AMR Service Provider | means a business or organisation that offers provision of consumption data from a utility meter collected through an AMR system to a number of parties including Consumers, Shippers, Energy Suppliers, Gas Transporters, DNOs, energy brokers and energy management companies. |
| Consolidated Metering Code of Practise (CoMCoP) | means the code of practice against which relevant ASPs, MEMs and MIs are assessed pursuant to the metering Accreditation Schedule. |
| Metering Equipment Manager | means, as applicable, either: (a) for electricity, a Meter Operator Agent (MOA); or (b) for gas, a Meter Asset Manager (MAM). |