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REC CHANGE PANEL MEETING
MEETING MINUTES

MEETING	**RECCP_26_0303**
DATE	**03 March 2026**
LOCATION	**By teleconference**

Attendee	Representing	Initials	Role
Joy Nnamani	Retail Energy Code Company	JN	Chair
Ben Atkinson	Domestic Suppliers	BAt	Voting Member
Alex Travell	Electricity Network Operators	AT	Voting Member
Andy Clasper	Gas Transporters	AC	Voting Member
Martin Brailsford	Metering Equipment Managers	MB	Voting Member
Sebastian Eyre	Independent SME	SE	Voting Member
Sarah Jones	Independent SME	SJ	Voting Member
Keith Foster	Independent SME	KF	Voting Member
Faye Brookes-Lewis	Consumers	FBL	Voting Member
Scott McPhillimy	Authority	SM	Observer
Nadir Hafeez	Authority	NH	Authority Representative
Holly Law	Code Manager	HL	Change Delivery Manager
Lydia Bentley	Code Manager	LB	Senior Change Lead
Bela Ashworth	Code Manager	BAs	Change Analyst
Florentina Monea	Code Manager	FM	Change Analyst
Mica Thomas	Code Manager	MT	Change Analyst
Paul Witton-Dauris	Code Manager	PWD	Head of Change
Alison Beard	Code Manager	AB	Observer
Harry Firth	Code Manager	HF	Secretariat

1 INTRODUCTIONS

The Chair welcomed attendees to the meeting of the REC Change Panel (RECCP). There were apologies received from Lindsay Biginton.

2 CONFIRMATION OF AGENDA

The Chair invited any additional items of business for consideration during the meeting; NH added item 11.1 – Authority Update.

3 APPROVAL OF PREVIOUS MINUTES

RECCP Members unanimously approved the draft minutes from the previous meeting held on 17 February 2026. The approved minutes would be published as 'final' and made available via the REC Portal.

4 R0253 - THEFT - DNO/NETWORKS NOT PROVIDING PHOTOS

As the Lead Analyst for R0253, LB provided an overview of the Change Proposal.

LB reminded Members that R0253 arose from an issue when Network Parties attend a Site first and make it safe (in cases of suspected/Confirmed Energy Theft), they may remove the physical evidence needed by Suppliers to make a Theft Detection Incentive Scheme (TDIS) claim. Suppliers require evidence of theft - in the form of a photograph or sketch - to support claims, but this evidence can be lost during safety works.

LB took Members through the proposed solution, to amend REC Schedule 8 to introduce an obligation on Network Parties, where possible, to take a photo of the meter / theft evidence before making the Site safe. If a photo is not possible, the Network Party should try to provide a sketch instead. The obligation is on an "all reasonable endeavours" basis, recognising safety risks, Consumer impacts, and time pressures on field operatives. Evidence must be sent to the Supplier proactively or on request, using GDPR-compliant, mutually acceptable methods

LB took Members through the evolution of the legal drafting, advising that the initial drafting putting a mandatory obligation to provide a photo/sketch had been changed to reasonable endeavours following Network Party feedback. A third version of the text had explicitly called out proactive sharing of evidence and changed "mutually agreed" communication methods to "mutually acceptable" to avoid the need for a formal agreement between Parties.

LB advised that R0253 had received significant industry feedback, having been considered at the REC Theft Issues Group three times, as well as a Party impact assessment. Suppliers had provided strong support for the Change Proposal and solution, in order to provide improved theft investigations, easier to evidence TDIS claims and improved cost recovery for theft investigation. Some Suppliers had suggested changing the definition of Energy Theft by removing the photographic evidence requirement, allowing for written statements instead, but the Code Manager considered this out of scope. Network Parties provided feedback that mandatory photos/sketches would add a cost to their organisational practices, and pose a safety risk to their field operatives, leading to the change to a reasonable endeavours basis.

LB presented the cost-benefit assessment of R0253, with identified benefits such as improvements to theft detection and resolution, enhanced Consumer safety and improved Supplier costs recovery. Identified costs included Network Party costs and operational challenges. The Code Manager determined that the cost-benefit test for R0253 had been met.

LB advised that 13 consultation responses were received for R0253, with six from Suppliers and seven from Network Parties. Of all responses, Suppliers were broadly all in favour of the proposed solution, with one offering qualified support as they felt the solution was not robust enough. Network Parties were split,

with three offering full/qualified support (following the move from mandatory to by all reasonable endeavours), and four against the solution.

AT and AC voted against the proposals, citing a lack of robust, quantified cost-benefit analysis, noting that most of the identified benefits were qualitative. They also raised concerns that sketches add little value and may reduce efficiency.

RECCP Members noted the contents of the Change Report; and

- **AGREED** by majority to approve the proposed solution
- **AGREED** by majority to approve the proposed implementation date of 06 November 2026; and
- **AGREED** by majority to approve the proposed implementation approach.

5 I0292 - OBLIGATE ENERGY SUPPLIERS TO PROVIDE PHOTO EVIDENCE OF THEFT IN CONVEYANCE TO NETWORK PARTIES

As the Lead Analyst for I0292, MT provided an overview of the Issue.

MT explained that I0292 proposes obligating Suppliers to provide sufficient evidence (e.g. photographic evidence) to Network Parties when Suppliers attend Sites that have been involved in theft. The problem being addressed is that Network Parties sometimes receive insufficient information, leading to unnecessary or duplicate Site Visits/jobs. The Issue arose from discussions at the October Theft Issues Group and links directly to R0253, which addressed evidence flowing in the opposite direction (from Network Parties to Suppliers).

MT advised that no solution has been proposed yet, and the plan is to issue an Information Request on 06 March to understand how often Suppliers encounter Theft in Conveyance and the frequency and scale of insufficient evidence being passed to Network Parties. Further impact assessment work is also planned for later in March 2026 to clarify the scope before solution development.

MT confirmed that I0292 will be a Self-Governance non-urgent Issue, with the Change Panel assigned as the Responsible Committee. I0292 has been given a low priority status, reflecting the limited impacts and current early-stage definition of the Issue. The impacted Parties are Suppliers and Network Parties, with no identified Consumer impacts.

MT provided Members with an overview of the milestones within the Change Proposal Plan. They noted that they will return to Change Panel in May with a full plan once the scope of the Issue has been determined.

Milestone	Activity	From	To
Definition		**03 Feb-26**	**15 May-26**
	Solution Analysis	February	March
	Solution Development	March	March
	Legal Review	March	April
	Impact Assessment	March	April
	Impact Assessment result	April	May

SM asked to be kept informed of any updates for this Issue. MT agreed to provide communications of when the Information Request and impact assessment are live.

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve the Issue Pathway; and
- **AGREED** unanimously to approve the Issue timetable for I0292.

6 I0302 - PROVISION OF DATA TO THE GES PROVIDER

As the Lead Analyst for I0302, BAs provided an overview of the Issue.

BAs explained that I0302 was raised by RECCo as part of work to develop a new dual fuel Enquiry Service Provider, involving migration from existing legacy services. At present, the Gas Enquiry Service (GES) Provider, the Central Data Service Provider (CDSP) and Gas Retail Data Agent (GRDA) are the same entity, and the REC reflects this by referencing a "logical interface" for data transfer. If these roles are separated in future, the REC will need to support a physical data interface to ensure gas data can still be provided to the GES provider. The Issue proposes amending Schedule 12 and the GRDS Definition document to remove reference to a "logical interface" of data transfer from the CDSP, GRDA and GES.

BAs confirmed that I0302 will be a Self-Governance non-urgent Issue, with the Technical Expert Panel (TEP) assigned as the Responsible Committee. I0302 has been given a medium priority status, as it is considered a legal clarification with limited technical and Consumer impact. The main impacted Party is Xoserve who are the CDSP, GRDA and GES Provider. BAs added that potential impacts on assurance services have been identified, but would work with RECCo and the REC Performance Assurance team on this area.

BAs provided Members with an overview of the milestones within the Change Proposal Plan, noting that the full plan can only be determined following further engagement with Xoserve.

Milestone	Activity	From	To
Definition		**11 Dec-25**	**07 April-26**
	Solution Development	February	February
	Legal Review	February	March
	Service Provider Impact Assessment	March	April

SJ queried whether the definition of the physical data interface, including how data would be transferred in practice, fell within the scope of I0302 or would be progressed separately. They highlighted the risk that, without clarity on the technical solution, the change could be treated as a text-only amendment despite having potential technical and operational impacts. BAs explained that this was still under discussion with RECCo, but that the current preference was to include the interface definition within the scope of I0302 where possible.

SJ emphasised the importance of addressing the technical elements early to avoid multiple impact assessments and asked that the scope be clearly defined when I0302 returns to panel. BAs responded that I0302 is linked to I0301 - Updates to Enquiry Service API endpoints to support migration to RECCo's API Gateway with work ongoing alongside RECCo to ensure the correct allocation of activities. BAs agreed to clearly set out the relationship between the two Issues in future updates.

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve the Issue Pathway; and
- **AGREED** unanimously to approve the Issue timetable for I0302.

7 R0307 - RELEASE AND LICENSING OF THE COMCOP LOGO FOR ACCREDITED PARTIES

As the Lead Analyst for R0307, FM provided an overview of the Change Proposal.

FM explained that the Consolidated Metering Code of Practice (CoMCoP) logo was trademarked ahead of the launch of CoMCoP in April 2023 but has not yet been made available to Accredited Parties. This delay was intentional, pending implementation of R0152 - Revision to the Consolidated Metering Code of Practice (CoMCoP). The absence of an official, licensed logo could create risks, including erosion of Consumer and stakeholder trust, reduced incentive for Parties to seek or retain Accreditation and potential misinterpretation and reputational harm to both RECCo and Accredited Parties

FM took Members through the proposed solution, to make the CoMCoP logos available to eligible Accredited Parties under a robust, well-governed licensing framework. This would include amending Schedule 15 to include a new paragraph (Paragraph 10) on the use of the CoMCoP logo and a new Annex A containing the four approved logo variants, as well as introducing CoMCoP Logo, CoMCoP Logo Trademark and Conflicting Brand as new defined terms into Schedule 1.

FM confirmed that R0307 will be a Self-Governance, non-urgent Change Proposal, with the Change Panel assigned as the Responsible Committee. R0307 has been given a low priority status, with minimal impacts identified on Consumers, RECCo, REC Parties and Service Providers No costs have been identified. Benefits identified in the case for change include market clarity and consistency, Consumer trust and confidence, recognition and incentive for Accredited Parties and mitigation of reputational risk.

FM provided Members with an overview of the milestones within the Change Proposal Plan. They advised that the Code Manager is looking to issue a consultation on 06 March, closing on 27 March before returning to Change Panel on 21 April.

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

RECCP Members noted the contents of the Change Report and the proposed solution; and

- **AGREED** unanimously to approve the Change Pathway and Timetable for R0307; and
- **AGREED** unanimously the Change Report contains sufficient information to proceed to consultation.

8 R0316 - CLARIFICATION OF DATA ITEMS WITHIN THE PAYMENT METHOD LEVELISATION SUPPLIER DATA REPORTING SPECIFICATION

As the Lead Analyst for R0316, BAs provided an overview of the Change Proposal.

BAs explained that R0316 is an Authority-Determined Change Proposal, raised by RECCo on behalf of Ofgem, following engagement with the Payment Method Levelisation (PML) team. R0316 arose from ambiguity in REC Schedule 31 regarding certain data item definitions used in PML reporting. This ambiguity has led to inconsistent Supplier data submissions, where some Suppliers are reporting based on Primary Metering Points, others reporting based on total Metering Points and some including Secondary Related Metering Points. These inconsistencies risk uneven allocation of scheme debts and credits and are not aligned with the original intent of the PML scheme.

BAs took Members through the proposed solution. Schedule 31, Appendix 1 will be amended to correctly label the data items. For the purposes of Appendix 1 only, Eligible Meter Point will be introduced. For Gas, this will be domestic Supply Meter Points, and for Electricity, this will be an Unrelated Metering Point or Primary Related Metering Point for (in each case) a Domestic Premises. This includes any domestic Metering Points that are related under a single Consumer account but not related as per REC Schedule 28. Unrelated Metering Point will also be added as a defined term to Schedule 1. BAs advised that this will ensure all Suppliers have clear and consistent guidance, improving operational efficiency, and removing ambiguity in the PML scheme. The Guidance to Suppliers document will also be made available on the REC Portal page.

BAs confirmed that R0316 will be an Authority-Determined, non-urgent Change Proposal, with the Change Panel assigned as the Responsible Committee. R0316 has been given a high priority status, and although it does not meet Ofgem's urgency criteria, it will be treated as such at Ofgem's request to meet the 01 May 2026 PML submission deadline. Impacted Parties identified are Suppliers partaking in the PML scheme.

BAs advised that no costs had been identified by the Code Manager for R0316. The Code Manager noted potential concerns around historic recalculation of PML payments, and BAs clarified that the proposed clarifications would apply on a forward-looking basis only, with no retrospective resubmissions required. Intangible benefits identified in the case for change are improved clarity on Supplier obligations in the PML scheme, ensuring accurate and aligned reporting across the scheme.

BAs presented the expected impacts of R0316 against the REC Objectives. Specifically:

- **To ensure the REC operates and evolves in a manner that facilitates the objectives of its mission statement**. It was considered that R0316 would positively impact this Objective, through eliminating ambiguity around the PML scheme, allowing for more consistent data submissions from Suppliers and consequential improved compliance with the scheme
- **To ensure customers' interests and data is protected in the operation of the REC.** It was considered that R0316 would have a neutral impact on this Objective, as it has minimal Consumer impact.
- **To drive continuous improvements and efficiencies in the operation of the REC and the central systems and communication infrastructures it governs**. It was considered that R0316 would have a positive impact on this Objective by driving continuous improvements and efficiencies in the operation of the PML scheme as it directly addresses a current issue of inconsistent data submissions.

BAs provided Members with an overview of the milestones within the Change Proposal Plan. They advised that they plan to issue the consultation on 04 March for the standard 15 working day period,

returning to Change Panel on 07 April for the final vote. They noted that a proposed implementation date of 17 April had been set, allowing for two weeks' notice ahead of the 01 May submission deadline. SM noted that with the upcoming local elections in May, Ofgem may be under purdah in mid-April and may not be able to provide a decision. BAs thanked SM for the information.

Milestone	Activity	From	To
Definition		**13 Feb-26**	**02 Mar-26**
	Solution Development	February	February
	Legal Review	February	February
Change Proposal		**03 Mar-26**	**06 Apr-26**
	Consultation	March	March
	Final Determination	April	April
Voting		**07 Apr-26**	**07 Apr-26**
	Issue for Authority Determination	08 April	08 April

NH asked about the proposed big bang implementation approach. BAs explained that all the proposed changes would be introduced into Code at once on the proposed implementation date of 17 April, so the REC is prepared for the PML submission deadline of 01 May.

RECCP Members noted the contents of the Change Report, the proposed solution and proposed implementation approach; and

- **AGREED** unanimously to approve the Change Pathway and Timetable for R0316; and
- **AGREED** unanimously the Change Report contains sufficient information to proceed to consultation.

9 R0304 - IMPLEMENTATION OF OFGEM-LED CODE MODIFICATION PRIORITISATION WITHIN THE REC

As the Lead Analyst for R0304, HL provided an overview of the Change Proposal.

HL informed Members that Ofgem is implementing a harmonised prioritisation framework across all industry codes under the powers granted by the Energy Act 2023 (Schedule 12). REC must update its code text, governance process and portal outputs accordingly. The change is Authority-directed, meaning REC must implement the mandated legal text once Ofgem publishes it and will receive 28 days' notice. HL added that implementation may be required as early as 1 April 2026.

HL provided Members with further detail on the new prioritisation framework. There will be two prioritisation categories: high which will require faster progression but not urgent and standard which follows the usual timelines. All codes must assess against three equally-weighted criteria: Alignment with the Strategic Direction Statement (including time horizon), Importance (value, consumer risk, market risk, regulatory compliance) and Complexity (scale, interdependencies, system/process impacts).

HL took Members through the required changes, noting that several REC documents and processes must be updated. This includes the change submission form, where Proposers will be required to provide a self-assessment against Ofgem's prioritisation criteria, and removal of references to the existing prioritisation matrix from the REC Portal. Updates will be also made to the Change Management User Guide, Change Tracker (with all old prioritisation scores replaced), Change Reports, as well as internal process maps, training materials, and guidance documents. Amendments to Schedules 1 and 5 and the

Change Panel Terms of Reference are also required, these have already been consulted on as part of Ofgem's process. HL added that a webinar will be held close to the implementation date for REC Parties to explain the new prioritisation process and proposer self-assessment requirements.

HL presented the case for changes for R0304. The solution is considered viable and implementable, with no additional central or Party costs, minimal implementation effort and supports the REC's ability for further alignment within the reformed code governance framework.

RECCP Members noted the proposed solution and proposed implementation date as directed by the Authority; and

- **AGREED** unanimously to approve the proposed implementation approach.

10 CHANGE PROPOSAL TRACKER

HL provided Members with an update on the Change Tracker.

HL provided an overview of the new submissions, which have all been accepted in by the Code Manager since the last Change Panel meeting on 17 February:

- I0315 - REC Portal Solution to R0224
- R0316 - Clarification to Data Items within the Payment Method Levelisation Supplier Data Reporting Specification
- R0317 - Number of Displayed Register Digits Data Item linkage
- I0318 - Introduction of Consumer Consent Solution
- R0319 - Clarification of in-year amendments to the CRS budget

HL advised that one new submission had been rejected by the Code Manager:

- **Guidance for Service Termination Issue Reporting A guide for MEMs on reporting and acting on Distribution Business asset condition issues, May 2025** - Issue rejected by the Code Manager as this is a Category 3 document, so needs to go through the Category 3 Change Process with the Responsible Owner (in this case, the Metering Expert Panel). There is a larger review of the Guidance for Service Termination Issue Reporting planned with the Metering Expert Panel, and this submission will be fed into that.

HL provided an overview of further updates:

- **R0287 - Clarification and Amendments to Annulment Definition in Schedule 23 – Alignment with SLC Obligations -** On 20 February 2026, the Authority published their decision to approve R0287 and reject R0287A, in line with the Code Manager and Change Panel recommendations. Following Ofgem's decision, this Change was implemented on 27 February 2026.
- **R0096 – CSS Message Regeneration Functionality -** On 25 February 2026, the Technical Expert Panel voted in line with the Code Manager recommendation to approve R0096 for implementation. Subject to no appeals raised, this Change will be implemented as part of the standard REC release in November 2027.
- **I0189 – Voice of the Consumer** - Following discussions with the RECCo Market Design team, this Issue has been moved to Resolved and will no longer be progressed at this time. An Issue Closure Report has been published with the full reasoning for this decision.

- **I0265 - Theft Calculator Usage and Suitability Assessment** - A third Working Group session will take place on 25 March 2026 and will be a specific session for Industrial and Commercial (I&C) cases.
- **R0266 – REC Data Specification Clarifications -** The consultation has closed. The Code Manager is reviewing responses and refining the solution, on track to present the Change Report (Final Recommendation) at the 07 April 2026 Change Panel meeting.
- **I0278 - Establishing the Safe Isolation Provider (SIP) as a Standalone REC Metering Party** - On 13 February, the Code Manager issued an information request to gather further input from the industry. Responses are due by 13 March 2026.
- **R0294 - Implementation of IF-051 Data Refresh in EES for BSC CP1607 -** The consultation closed on 27 February 2026. The final recommendation will be prepared for consideration by RECTEP on 25 March 2026, following on the outcomes of BSC CPs 1607 & 1629 at BSC Supplier Volume Allocation Group (SVG) on 03 March.
- **R0286 - Clarification on Detailed Impact Assessment Activities -** The consultation has been published, responses must be received by 23:59, 13 March 2026.

11 ANY OTHER BUSINESS

11.1 AUTHORITY UPDATE

NH provided Members with the following updates from the Authority:

- Strategic Direction Statement (SDS 2)
    - Consultation on SDS 2 will begin at the end of March.
    - Publication expected in early September, with industry workshops during the consultation period (likely around May).
    - Structure will remain the same as SDS 1: (Act now / Think and plan / Listen and wait).
    - Improvements will focus on more targeted “Act now” areas.
    - A similar number of policy areas to SDS 1 is expected, with:
        - Some new areas added, mainly due to REMA decisions.
        - Some areas removed where Code changes are complete or no longer needed.
    - A supporting spreadsheet will again be published alongside the draft SDS as a quick reference.
- Implementation and Code Reform Phasing
    - Code Managers will be required to explain how they will deliver the SDS in their delivery plans.
    - Phase 1 (Winter 2026): BSC and REC (Code Managers appointed).
    - Phase 2: Electricity commercial codes (CUSC, DCUSA) and gas network codes (UNC, IGT UNC).
    - Phase 3: Electricity technical codes (Grid Code, STC, SQSS, Distribution Code, SEC).

    - Until Codes are designated and Code Managers appointed, the SDS remains preliminary:
        - Existing Code Administrators are not obligated to produce delivery plans.
        - However, Ofgem expects Administrators and Panels to:
            - Consider SDS priorities within existing budgets and delivery planning.
            - Identify existing or potential modifications that support SDS delivery.
    - More detail on roles and responsibilities across all phases will be included in the SDS 2 draft consultation.
- New Consultation on Ofgem Performance Indicators
    - Ofgem has launched a consultation on performance and sector health indicators.
    - Most indicators already exist, but the aim is to use them collectively for greater transparency.
    - Of particular interest: a proposed indicator on Ofgem's performance relating to code modifications.
    - Stakeholder views are invited on which indicators would drive optimal behaviours.
    - Consultation closes: 7 April 2026.

AT asked whether there would also be a publication on stakeholder advisory forums and the appeals process, which had previously been consulted on. NH confirmed that several publications are due at the end of the month but could not confirm whether that specific item would be included. They indicated further updates may follow, potentially at the next Change Panel meeting.

There was no further business raised, and the Chair closed the meeting.