RETAIL ENERGY CODE

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01	Proposal Plan
02	Consultation
03	Final Recommendation

CHANGE REPORT

R0311 – COMCOP 2-YEAR AUDIT CYCLES

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	BIG BANG
IMPLEMENTATION APPROACH	26 June 2026

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL	CHANGE PATH	SELF-GOVERNANCE
PRIORITY STATUS	MEDIUM	URGENCY	STANDARD
IMPACTED STAKEHOLDERS	Metering Equipment Managers (MEMs), AMR Service Providers (ASP)		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	ASSURANCE LEAD	SUBJECT MATTER EXPERT
FRANCINE PEYROUX-SISSOKO	KEISHA PATEL	ANTON MODEN	CHRIS THOMPSON
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OVERVIEW

This Change Proposal seeks to align the Metering Accreditation Schedule's auditing information with current practices to ensure a consistent audit cycle across industry.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the Change Panel:

- **APPROVE** the Proposal Plan, including the Metering Expert Panel as the Responsible Sub-Committee, the self-governance path, the medium priority status, the standard urgency and timetable.
- **APPROVE** that this Change Report contains sufficient information to proceed to Consultation, noting the Code Manager Minded-to Position below.

The Code Manager Minded-to Position is to recommend that the Change Panel:

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

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BACKGROUND

1 SUMMARY

Renewal audits under the Consolidated Metering Code of Practice (CoMCoP) are consistently delivered on a two-year cycle and include both a desktop audit and a site audit. However, the Metering Accreditation Schedule currently does not explicitly define the two-year audit cycle nor the requirement for both desktop and site audit components. It also does not specify the timeline for the first periodic audit. Although current operational practice is consistent, the absence of codified requirements presents a long-term risk of divergence in approach which could weaken assurance outcomes. Strengthened audit requirements could also enhance Consumer protection through stronger, clearer assurance mechanisms, directly reducing the risk of unsafe metering installations in Consumers' premises.

Wilcock Consultants Ltd (WCL) became the CoMCoP Scheme Auditor in April 2023. During mobilisation, WCL identified inconsistent audit cycles across auditable Parties, ranging from one to three years. WCL recommended a consistent two-year cycle with a dual-stage audit including a desktop and a site audit. This was accepted by RECCo as the basis of service delivery for all Parties who have since then transitioned to a two-year audit cycle.

2 PROBLEM STATEMENT

The current lack of explicit wording in the Metering Accreditation Schedule of both a desktop and site audits that need to be completed one year after the initial accreditation, and then every two years for renewals introduces ambiguity for future audit delivery undertaken under CoMCoP as it creates a gap between operational practice and the codified baseline. This could potentially lead to inconsistent approaches by Parties, which in turn could reduce the consistency, predictability, and effectiveness of the industry's audit and assurance framework.

3 IMPACTS

CONSUMERS
All Consumers

REC SERVICE PROVIDERS
AMR Service Providers

RECCO / REC CODE MANAGER
N/A

REC PARTIES AND SERVICE USERS
Metering Equipment Managers (MEMs)

REC DOCUMENTS / PRODUCTS
Schedule 15 - Metering Accreditation

MHHS
There are no expected impacts to MHHS at this stage.

4 CROSS-CODE IMPACTS

No Cross-Code impact has been identified.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Change Proposal		**17 Mar-26**	**12 May-26**
	Business Case Assessment	March	April
	Consultation	April	April
	Final Determination	April	May
Voting		**13 May-26**	**13 May-26**
	Appeal Window	14 May	28 May

This Proposal Plan does not include a Party impact assessment because there are no impact or operational changes required by REC Parties. REC Parties will be able to engage and submit views as part of the industry consultation that is expected to be issued in April 2026.

6 STAKEHOLDER ENGAGEMENT

Stakeholder engagement will be facilitated via the industry consultation process, with no further engagement expected to be necessary.

7 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	Retail Risk(s)	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		3	9	28
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	0	10	0
				Overall Priority Score (rounded)	129

Priority Status	MEDIUM
Change Proposal Type	STANDARD

The Code Manager has given this Issue a medium urgency score based upon a weighted priority score of 129. This reflects the direct contribution to the mitigation of a long-term risk of different auditing approach which could weaken assurance outcomes, as well as the assurance that Parties meet their obligations.

SOLUTION

8 PROPOSED SOLUTION

The Code Manager is proposing to amend the REC to ensure that the Metering Accreditation Schedule aligns with current practice established under CoMCoP. The Code Manager will therefore update the REC Schedule 15 – Metering Accreditation to ensure it is specified that the audit should be conducted as below:

- One year after the initial accreditation for the first periodic audit and then a two-year cycle for renewals; and
- both a desktop and a site audit rather than the possibility to do one of each.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0311 can be found here.

PRELIMINARY ASSESSMENT

10 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

No risks, assumptions, issues and dependencies have been identified by the Code Manager at this stage.

11 BUSINESS CASE ASSESSMENT

11.1 COSTS

There are no costs associated with the implementation of this Change Proposal.

11.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
IMPROVE CLARITY AND ASSURANCE IN THE AUDIT PROCESS	The implementation of this Change Proposal should improve clarity in the audit process, ensuring operational practice is consistent and Parties abide by the Code, and provide an effective industry's audit and assurance framework.
ENHANCE CONSUMER PROTECTION	The implementation of this Change Proposal should strengthen audit requirements which in turn should enhance Consumer protection through stronger, clearer assurance mechanisms, directly reducing the risk of unsafe metering installations in Consumers' premises.

11.3 COST BENEFIT ANALYSIS

There are no central system costs and no expected costs to Parties for implementing this Change Proposal. As such, there is a positive cost-benefit for this Change Proposal based upon the lack of associated costs and the two intangible benefits detailed above.

12 CASE FOR CHANGE

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 system costs and no associated Party costs;
- has proportionate effort required for implementation;
- should improve clarity and assurance in the audit process; and
- should enhance Consumer protection.

13 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link

14 GLOSSARY

TERM	DEFINITION
AMR Service Providers (ASP)	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.
Change Proposal	means a proposal to change this Code made in accordance with Clause 11 of the main body of this Code or the Change Management Schedule.
Consolidated Metering Code of Practice (CoMCoP)	means the code of practice forming part of this Code against which Meter Asset Managers, Meter Operator Agents, Approved Meter Installers, Electricity Metering Operatives and AMR Service Providers are assessed pursuant to the Metering Accreditation Schedule.

Consumer	means any person supplied (or seeking a supply) of Energy at an RMP (whether or not that person also exports or is seeking to export electricity at an RMP).
Metering Equipment Manager (MEM)	means, as applicable, either: (a) for electricity, a Meter Operator Agent (MOA); or (b) for gas, a Meter Asset Manager (MAM).