New REC Governance Arrangements and Stakeholder Advisory Forum

29 – July 2026, Webinar Q&A

	Question	Answer
1.	Have REC considered use of the SAF pool of experts to retain expertise from MEP and TEP, as well as main SAF members?	Yes. We are considering how the SAF's pool of experts can retain valuable knowledge and experience from the MEP and TEP, alongside the expertise provided by the core SAF membership. We are currently proposing that two of the SAF REC Party Representative positions are allocated to Metering Equipment Managers (MEMs). The final shape of the wider SME pool is still being developed and will be informed partly by the outcome of the REC Party nomination and election process, including the expertise and experience of those appointed. The SME pool will be flexible rather than fixed. It will be reviewed and refreshed regularly so that the Code Manager can bring in the right specialist knowledge for the modifications and issues under consideration, address any capability gaps within the core SAF membership, and respond as the needs of the REC evolve.
2.	When explaining how RECCo will become the authority that decides which RECMODs are approved and rejected, you mentioned engaging specialists who were previously on MEP/TEP, etc. If there was to be a RECMOD that these specialists were opposed to, but RECCo was keen to be approved, what processes will be put in place to ensure that this specialist	The first consideration is ensuring the right expertise is avaialble to the SAF, either through core membership or wider pool membership, to provide effective advice and challenge to the Code Manager through the process. The Code Manager will be required to actively consider and address feedback from the SAF. This does not require the Code Manager to agree with the views of the SAF but it would be required to justify where it disagreed and how it had considered the views of the SAF. Secondly, engagement with the SAF is not a proxy for wider engagement with industry parties through the development of the process. The Code Manager will be

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	advice is adhered to, as the ability to approve/reject RECMODs has been removed from them under the new model?	required to refer issues or modifications to workgroups by default. This will give an opportunity for industry experts to input into the development of a proposal, prior to any decision being made.
3.	Will the SAF members record votes on modifications and push these forward as recommendations to the Code Manager, and will these votes and recommendations be made public?	SAF members will be required to vote on the SAF recommendation and record their rationale. The SAF will also be required to provide their views on whether a modification would better facilitate the code objectives, which is a separate view to that of the Proposer and Code Manager. The Independent SAF Chair will be required to document the SAF's views, including whether the SAF reached a consensus or a majority view. This will include any appropriate context that the SAF or SAF Chair deems necessary. The recommendation will be included in the Final Modification Report. Whether this will include individual members' voting records has not been determined.
4.	Is there a view on the code party representatives numbers by constituency?	Our current proposal is to have seven Code Party representatives, with one representative for each identified area of expertise. For clarification, Code Party members will not be representing constituencies in the traditional sense. They will be appointed for the expertise they bring from their sector or operational role and will be expected to act impartially. Their role is to use that expertise to provide advice and constructive challenge to the Code Manager for example, helping to ensure that the impacts on a particular area of the market have been properly identified and considered.
5.	I noted that the SAF can provide feedback on Code Manager performance - what does good or bad performance mean for a Code Manager?	The Code Manager licence requires Code Managers to report against a performance framework established by Ofgem, and Ofgem has proposed targeted surveys of SAF members as one element of that framework. It is not yet clear how prescriptive Ofgem will be on the detailed survey questions. Where there is flexibility, we would expect to work with the SAF to define what good

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		performance looks like in practice and to ensure the surveys focus on the outcomes that matter most to stakeholders. This could include areas such as stakeholder engagement, transparency, timeliness and the effectiveness of the Code Manager's analysis and communications etc
6.	Is the 'Code Manager' a body i.e. are there meetings of the Code Manager, to make decisions if SAF 'advises' - I'm not sure it's clear on the future governance diagram - how does the SAF report and to whom?	The SAF is an independent advisory forum established under the Code Manager Licence and the REC. Subject to licence grant, RECCo will become the licensed Code Manager and will be accountable for the decisions assigned to the Code Manager. The SAF will provide independent advice, expertise and constructive challenge, but its recommendations will not be binding. RECCo has therefore established internal governance to ensure that Code Manager decisions are made consistently and transparently, with the SAF's views properly considered and documented. Where RECCo reaches a different conclusion from the SAF, it will clearly explain and document the reasons for its decision.
7.	Will IGT and IDNOs be incorporated into the GT/DNO Code Party Representatives, or will they have their own position? As often operational positions may differ.	We recognise that IGTs and IDNOs may have distinct operational perspectives. Once the nomination and election process is complete we can consider whether we have good representation in this area or where additional expertise is needed address this through the SAF Pool.
8.	will DCC have to abstain on any DCC impacting changes due to potential conflict of interest?	SAF members will be required to act impartially and not represent the interests of an organisation. There will be arrangements for determining where SAF members have a conflict of interest, including where they are the proposer of a modification proposal. In these cases, they will be able to participate in the conversation but not participate in the vote. This applies to all SAF members, not just the DCC.
9.	Are there any specific minimum/maximum numbers	In developing the REC arrangements, we are mindful that the size of the SAF will be important to support effective

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	for each type of representative	discussion. Our current approach is therefore to have a single Code Party representative for each area of expertise identified within the core membership, with additional expertise drawn from independent members or the SAF Pool, where appropriate.
10.	Are all Code Managers following the same approach to the responsibilities and duties of the SAF chair and members i.e. are RECCo and Elexon working together to provide a consistent approach and SAF outcome?	Ofgem has set out common expectations for all SAFs through the Code Manager licence conditions and its proposed SAF code text. These establish a consistent baseline for the responsibilities of the SAF, the role of the independent Chair, and the duties of members, including impartiality, independence and consideration of stakeholder views. RECCo is working closely with Ofgem and Elexon to align how these requirements are interpreted and implemented in practice. While some operational arrangements may need to reflect the circumstances of each code, the intended outcome is consistent: an independent and effective forum that provides informed advice and constructive challenge to the Code Manager.
11.	Is the Code Manager solely responsible for decisions on modifications (advised by the SAF) or is there ever a recourse to the Authority?	There will still be recourse to the Authority. Modification Proposals will still be classified as either self-governance or authority-determined. The Code Manager will be responsible for decisions for self-governance modifications only. Any authority-determined modifications will include a recommendation from both the SAF and the Code Manager to the authority. Self-governance decisions will still be subject to an appeal window, where the Authority will determine whether to uphold or overturn the decision of the Code Manager.
12.	SAF members are there as experts, not reps of their employer. Are they also expected to represent their constituency and if so are they expected to solicit industry views as part of their role, or are the only industry	The Code Manager remains accountable for developing and progressing each modification, drawing on appropriate industry, consumer and technical expertise through operational forums, consultation and other targeted engagement. The SAF complements, rather than replaces, this engagement. Its role is to provide impartial advice and constructive challenge at key stages, consider

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	views those that are verbalised at SAF mtgs	stakeholder consultation responses, and test whether relevant views and evidence have been properly reflected in the Code Manager's assessment. SAF members should draw on their expertise while acting impartially, rather than representing the interests of the organisation or constituency that appointed or elected them. The SAF will also assess modifications against the Relevant Code Objectives and advise on whether they should be implemented.
13.	Will SAF meetings be for exclusively between RECCo and SAF or will this be an open meeting that other parties (e.g. Code Managers or wider industry) can attend?	As well as SAF members, the Code Manager and Ofgem; Modification Proposers will be entitled to attend the part of a SAF meeting discussing their Modification Proposal. Any other attendance will be at the Chair's discretion, based on the justification for attending the meeting. Wider industry engagement in the development and progression of a Modification Proposal should occur through attendance at the relevant workgroup, direct engagement with the Code Manager and/or Proposer, or participation in the formal impact assessment/consultation process.
14.	Is there a view on the code party representatives' numbers by constituency?	Our current approach is to have a single Code Party representative for each identified area of expertise. These members are appointed to bring knowledge and experience from their particular sector or operational role, rather than to represent a constituency or advocate the views of their employer.
15.	Picking up on some of the code party rep questions below.....any provisions and/or safeguards wrt 'small suppliers' or new market entrants?	Once the nomination and election process is complete, we can consider where we have gaps in representation. If we lack representation from small suppliers or new market entrants, we would look to address this through SAF Pool representation.

For any further questions, please contact the team at communications@retailenergycode.co.uk.

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