RETAIL ENERGY CODE

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I0312 WORKING GROUP
MEETING MINUTES

MEETING	**I0312WG_1709**
DATE	**17 September 2026, 10:00**
LOCATION	**On Teams**

Attendee	Representing	Initials	Role
Jon Hawkins	Retail Energy Code Company	JH	Chair; Director of Market Design
Bela Ashworth	REC Code Manager	BA	Change Delivery Manager
Glenn Sheern	REC Code Manager	GS	REC Regulatory Specialist
Rebecca Griffiths	Retail Energy Code Company	RG	Working Group Member
Jemma Johnson	Retail Energy Code Company	JJ	Working Group Member
Rebecca Lowe	Retail Energy Code Company	RL	Working Group Member
Georgina Watkins	Good Energy	GW	Working Group Member
Rebecca Bennett	Centrica	RB	Working Group Member
Patricia Parker	ESG Global	PP	Working Group Member
Meg Wong	Stark	MW	Working Group Member
Beth Tatton	Calisen	BT	Working Group Member
Helen Clarke	Stark	HC	Working Group Member
Liz Kelf	Good Energy	LK	Working Group Member
Martin Brailsford	Talan; AMO representative	MB	Working Group Member
John Greene	SSE	JG	Working Group Member

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1 INTRODUCTIONS

JH opened the meeting, and explained the focus of the session:

- Recap the working group's position on meter removal / de-energisation, meter installation / exchange and fault resolution;
- Final areas of review of Schedule 14 – Metering Operations, namely proving tests and Safe Isolation Providers (SIPs) / Crowded Meter Room MOAs;
- Review draft Party impact assessment.

JH confirmed that following the closure of the Party impact assessment, the working group may convene again to review the outcome of the Party impact assessment and consider any further changes needed.

2 REVIEW MINUTES AND ACTIONS OF PREVIOUS MEETING

No comments were received and no amendments were proposed to the draft minutes of the first session.

The Code Manager has an open action to draft the Impact Assessment.

WG members approved the minutes and actions of the previous meeting.

3 PROCESS MAPS

3.1 METER INSTALLATION / EXCHANGE

JH gave an overview of slides 7 to 9 of the attached slide pack. Following the last working group session, process maps for meter installation and exchanges had been updated to reflect the working group's discussion. Updates to the process maps are reflected in red.

- It was agreed that Import Suppliers do not need to notify Export Suppliers when meter works have been requested or ongoing.
- The Export Supplier is only made aware of meter works completed by the Import Supplier through the receipt of updated Meter Technical Details (MTD) following a successful meter installation / exchange.
- The working group agreed that the process follows existing arrangements;
    - The Import Supplier requests a meter installation / exchange from the Meter Operator.
    - The Meter Operator validates that a bilateral contract exists and the work can commence.
    - The Meter Operator communicates the outcome of the exchange / installation by sending updated MTDs to both the Import and Export Suppliers or by notifying only the Import Supplier of reasons for failure to complete the meter works.
    - The Import Supplier, having arranged the meter works with the Consumer, notifies them of the outcome of the meter works.

- It was also agreed that the Meter Operator would not be required to notify the Export Supplier of no/refused access or similar reasons for failure.

JH confirmed that an earlier proposal for the Meter Operator to notify the Export Suppliers of failures was rejected by the working group, as such that requirement has been removed from the process map.

The working group discussed whether Export Suppliers should be informed when meter interference, tampering, damage or safety issues are identified during the meter works. This would result in the issuing of either a D0136 to report meter interference or damage, or a D0135 to the DNO to report interference or damage to the DNO's equipment.

Two working group members supported notifying the Export Supplier when interference or damage is identified. This would allow Export Suppliers to review meter readings and assess whether export data may have been affected. Without this notification, Export Suppliers would have no visibility of potential issues impacting consumption or meter readings. Additionally, Energy Suppliers have obligations to investigate theft and tampering. If it is identified on the Import side, the information should also be shared with the Export Supplier so they can fulfil their own investigation obligations.

The working group agreed that, where a meter job fails due to safety concerns, damage or interference, the Meter Operator should notify both the Import and Export Suppliers so the Export Supplier can consider whether investigation is needed on their side.

I0312WG_1709_A01: The Code Manager to include in the Impact Assessment the requirement by the Meter Operator to notify both Import and Export Suppliers of identified meter interference or damage, and notification of both Suppliers by the Meter Operator through sending a D0136 and notification to the DNO by the Meter Operator through the D0135 on both the Export and Import.

RB raised a scenario for further consideration for requiring the Meter Operator to notify the Export Supplier; meter interference or safety issues have been identified, but the meter exchange is completed successfully. The Export Supplier would receive updated MTDs but may not be informed that interference or damage had been found on the removed meter. Interference may still have affected the accuracy of historic Export registrations.

The working group raised several suggestions for notification mechanisms:

- D0136 to report interference or damage relating to the removed meter. However, the D0136 is primarily associated with Revenue Protection Investigations and the physical evidence of tampering may have already been removed during the meter exchange.
- D0239 may be more appropriate, but recognised that Meter Operators do not commonly use this flow.
- Use of D0001 or D0002 because they already support reporting of faults or suspected tampering and Meter Operators can send those to any Party.

- The D0002 flow may be the most appropriate existing mechanism, but further validation is needed on whether D0002 site visit CHECK codes are sufficient and whether best practice guidance is needed.

The working group discussed whether Meter Operators would be able to distinguish between different failure reasons (e.g., refused access, damage, interference), even if the failure reason is not mapped to a code on the flow, and where notifications may only be required for certain reasons.

MB advised that practices are likely to vary between meter operators, with some reliance on internal exception management processes and manual intervention. Further validation with Meter Operators was suggested. Internal processes may also be dependent upon contractual agreements.

JJ noted the need to differentiate between safety and interference concerns as interference or tampering is more likely to trigger further investigations before meter works can be completed. Safety concerns identified are likely to lead to replacement of the meter equipment.

JH noted the need to clarify whether a description of safety / interference / damage identified would be sufficient, or whether use of site visit check codes on the D0002 is more appropriate.

RL raised that site visit check codes do not necessarily relate to an issue with the Export or Export metering. RL further noted that it is likely the Meter Operator would have performed a limited investigation during a routine meter exchange, rather than conducting a full Revenue Protection Investigation. Creation of additional Export-specific codes may need to be considered in the future if emerging risks or new forms of Export meter tampering create the need for greater granularity than currently provided under existing codes.

I0312WG_1709_A02: The Code Manager to include in the Impact Assessment the requirement by the Meter Operator to send the Export Supplier of identified meter interference or damage, even after the meter was exchanged successfully, and the appropriate mechanisms of notification.

The working group considered whether guidance is needed on how Export Suppliers should respond when the Consumer contacts them about a meter work that they cannot action.

- The working group considered guidance around directing Consumers to directly contact their Import Supplier or allowing the Export Supplier to raise an SDEP case to notify the Import Supplier of the need for meter works.
- Where the Consumer asks for a fault investigation, the Export Supplier should be able to raise the issue directly with the Import Supplier.
- For other meter works, responsibility should remain with the Import Supplier to raise the meter works. In these scenarios, the Export Supplier should refer the Consumer to the associated Import Supplier.

I0312WG_1709_A03: The Code Manager to include in the Impact Assessment possible guidance or a REC Wiki article around standard messaging for Export Suppliers when redirecting Consumers.

The working group discussed a potential gap in the Code regarding tampering or fraud impacting Export Registrations. Current theft arrangements within REC Schedule 8 are predominantly focused on Import consumption and may not fully address scenarios where Export readings are manipulated for fraudulent reasons. This issue was recognised as an area that may require future review, but is not within the scope of Issue I0312.

JH gave an overview of slide 9 of the attached slide pack, reviewing the process when an Export Supplier who holds a valid contract with the Associated Meter Operator initiates meter works:

- The Export Supplier requests the work from the Meter Operator.
- The Meter Operator validates the contractual arrangements before booking the work.
- The Export Supplier should be required to notify the Import Supplier of the planned work.
- The D0005 was suggested as the most appropriate flow, but would need a new 'Requested Action Code' to be able to identify the specific notification purpose and include the relevant appointment information.
- The Import Supplier may then raise an SDEP query with the Export Supplier – a new SDEP query would need to be created.
    - The working group agreed that no formal right to object should be introduced. Instead, the Import and Export Suppliers should then discuss bilaterally whether works should continue.
    - If the meter work proceeds, in the case of a successful installation or exchange, updated MTDs should be sent to both Import and Export Suppliers.
    - If there is a failure reason other than safety, interference or damage, the failure reason would only go to the Export Supplier as the requesting Supplier.

The working group discussed whether the proposed arrangements are compatible with obligations on the Import and Export Suppliers under the SEC, including that the Import Supplier is the 'owner' of the meter and has responsibilities around security of the meter, Export-led meter exchanges which may require decommissioning and removal of the Smart asset, and further considerations around Service Requests, and Smart Communication Hubs.

I0312WG_1709_A03: The Code Manager to discuss with SEC colleagues Import and Export Supplier obligations under the SEC and impacts of both removing and installing Smart metering assets.

The working group discussed whether minimum notice periods should apply to Export Suppliers when they notify Import Suppliers of planned meter works. If there is a delay with the Import Supplier objecting to a meter works following receipt of a D0005, that could lead to cancelling jobs and the resulting cancellation costs, and further operational uncertainty for the Meter Operator.

- The working group proposed a requirement on the Export Supplier to send the D0005 to the Import Supplier at the same time they send the meter request to the Meter Operator.
- The REC does not usually provide for minimum notice periods before a planned request and the REC does not provide for commercial models that prevent cancellation costs. These are typically agreed bilaterally between the Energy Supplier and the Associated Meter Operator.
- Consumers may require urgent or short-notice appointments.

I0312WG_1709_A04: The Code Manager to include in the Impact Assessment validation of required minimum notice periods and how queries by the Import Supplier should be managed.

The working group also identified scenarios where metering works could result in a Change of Market Segment.

3.2 FAULT RESOLUTION

JH provided an overview of slides 10 and 11 of the attached slide pack. Two process maps are provided; a process where either Import or Export Supplier hold contracts with the Associated Meter Operator; and a process where the Export Supplier does not hold a valid contract with the Associated Meter Operator.

Where both Suppliers hold valid contracts with the Meter Operator;

- The initiating Supplier requests a fault investigation with the Meter Operator using a D0001 flow.
- The initiating Supplier also notifies the other Supplier of the fault using a D0001 flow.
- Any queries between Suppliers would be managed via SDEP. A new SDEP query would need to be created.
- The Supplier leading the investigation remains responsible for progressing the fault resolution.
- Once the investigation concludes, the Meter Operator should issue a D0002 outcome notification to both the Import and Export Suppliers.
- Where a meter exchange is completed as part of the fault investigation, updated MTDs are to be issued by the Meter Operator to both the Import and Export Suppliers.

The working group agreed this process reflected previous working group discussions. No further queries were raised.

Where the Export Supplier does not hold a valid contract with the Meter Operator:

- The Export Supplier requests a fault investigation with the associated Import Supplier via a D0001 flow.
- The Import Supplier assesses whether the fault requires investigation.
- Where the request for an investigation is rejected, the Import Supplier should send a D0002 to the Export Supplier to notify them of the rejection. The Export Supplier should then communicate this with the requesting Consumer/generator.
- Where the request for an investigation is accepted, the Import Supplier should confirm this acceptance with the Export Supplier and either send the fault investigation request to the Associated Meter Operator via the D0001 or investigate and resolve the fault internally.
    - Following internal resolution of the fault, the Import Supplier should notify the Export Supplier via the D0002 fault resolution report. SMETs meters may be entirely under the responsibility of the Import Supplier to investigate and resolve.
    - Following the Meter Operator's investigation,

The working group discussed whether there should be a mechanism for the Export Supplier to follow up with the Import Supplier and how long they should wait. A working group member proposed aligning the SLA with existing GSOP standards to take action on a fault within 10 Working Days – this could be acknowledgement of the SDEP query within 10 Working Days.

The working group agreed to propose 10 Working Days in the Party impact assessment as an initial point at which an Export Supplier could reasonably seek an update if no further communication had been received.

I0312WG_1709_A05: The Code Manager to review with REC legal advisers whether notification of a Smart fault would trigger Energy Suppliers' obligations under GSOP.

I0312WG_1709_A06: The Code Manager to include in the impact assessment the proposal for 10 Working Days between an Export Supplier raising a fault investigation request with the Import Supplier and seeking an update if no further communication has been received.

4 PROVING TESTS

JH talked through slides 12 to 14 of the attached slide pack.

The majority of circumstances in which a Proving Test would be initiated would expect to be initiated by the Import Supplier, where there is a shared Import/Export meter using the Import Supplier's Meter Operator. The working group discussed whether the Export Supplier should be required to request the Proving Test from the Meter Operator where a Proving Test is required as a result of metering works initiated by the Export Supplier. Additionally, where the Meter

Operator issues the results of a Proving Test (D0214) to the Electricity Supplier, whether this should be issued to both the Import and Export Suppliers.

- As the BSC requires testing for both Import and Export and pulse multipliers can be set up differently for each channel and in the MTDs, the current expectation is that Proving Tests are issued to both Export and Import Suppliers.
- For many large generation sites, the Export Supplier tends to drive all the communications because they have the primary commercial relationship with the customer. They should be able to request Proving Tests for the metering system as a whole.
- Either Supplier should be able to request Proving Tests as needed.
- If duplicate requests are raised, the Meter Operator should be able to manage and coordinate these Tests appropriately.
- Proving Test results should be sent to both Import and Export Suppliers.

I0312WG_1709_A07: The Code Manager to include in the impact assessment that either Import or Export Supplier can request Proving Tests and, where duplicate requests are raised, the Meter Operator should be able to manage these requests.

5 SAFE ISOLATION PROVIDERS / CROWDED METER ROOM MOAS

JH walked through slide 16 of the attached slide pack.

The working group discussed whether SIPs and Crowded Meter Room MOAs should be required to notify both the Import and Export Suppliers, or just the Import Supplier.

- The REC currently refers to notifying the "Registered Supplier" but does not explicitly distinguish between Import and Export Suppliers.
- Requiring SIPs to notify multiple Electricity Suppliers may introduce complexity as they are likely to be smaller organisations that do not routinely work with industry data flows. Requiring them to identify and notify multiple Electricity Suppliers could create additional administrative burden and potentially act as a barrier to participation.
- Where there is damage or interference (D0136), both Suppliers ultimately need visibility of the issue. To remove additional complexities or burdens for SIPs, the working group proposed that the Supplier that the SIP notifies would be responsible for notifying the other Supplier and the Associated Meter Operator. It was noted that the SIP is more likely to notify the Import Supplier.
- Existing meter exchange/installation and fault resolution processes may already provide sufficient mechanisms for relevant information to reach Export Suppliers where necessary.

- Where there is notification related to the Energisation status, only one Energy Supplier may need to receive the information directly from the SIP. The Meter Operator already has an obligation to synchronise Energisation status changes between associated Import and Export Suppliers.
- At this stage, the working group did not have a strong view that both Suppliers needed to be informed that a SIP visited the site, nor that the Export Supplier needed to receive all information notifications.
- Where it is an Export-only site, the SIP would be required to inform the Export Supplier.

I0312WG_1709_A08: The Code Manager to include in the impact assessment validation for events which trigger the requirement for SIPs and Crowded Meter Room MOAs to provide notifications to both Import and Export Suppliers, and whether it is sufficient to only notify the Import Supplier.

6 DRAFT PARTY IMPACT ASSESSMENT

BA provided an overview of slides 17 to 22 of the attached slide pack, including the next stage in the Change process and the approach to the Party impact assessment.

A draft version of the legal text changes to REC Schedule 14 – Metering Operations, with signposting of new requirements and clarifications to be introduced, would be provided alongside the Party impact assessment for Parties to review. The draft legal text will reflect the requirements and recommendations developed by the I0312 working group. The proposed changes to Schedule 14 are not expected to introduce new concepts beyond those already discussed through the process mapping exercises and working group discussions.

A new defined term may be introduced into REC Schedule 1 – Interpretations and Definitions around ‘Import Supplier’. This would align with the introduction of the term ‘Export Supplier’ under R0207 and to provide clarity throughout Schedule 14 when referring to the associated Export or Import Supplier.

Additional guidance may be developed to support Import and Export Suppliers, particularly around communications with customers who request meter works and in handling potential delays to meter works. This is to be validated within the Party impact assessment.

Next steps will include:

- Issue of the Party impact assessment in October-November.
- Draft legal text review by REC legal advisers.
- Publication of a Change Report (Update to Plan).

JH thanked working group members for their input into reviewing Export meter work arrangements. Working group members were encouraged to review and respond to the Party impact assessment. Members encouraged to reach out via email for further discussion or confidential input.