RETAIL ENERGY CODE

This document is classified as **GREEN**.
Information can be shared with other REC Parties.

I0312 WORKING GROUP
MEETING MINUTES

MEETING	**I0312WG_0605**
DATE	**06 May 2026, 11:00**
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	Secretary; Change Analyst
Glenn Sheern	REC Code Manager	GS	REC Regulatory Specialist
Sophie Barker	F&S Energy	SB	Working Group Member
Gina Watkins	Good Energy	GW	Working Group Member
Martin Brailsford	AMO	MB	Working Group Member
Molly Fraser	REC Code Manager	MF	Working Group Member
Bill Lester	AltHanCo	BL	Working Group Member
Lee Walker	Elexon	LW	Working Group Member
Nik Wills	Stark	NW	Working Group Member
Rebecca Griffiths	Retail Energy Code Company	RG	Working Group Member
Chelsea Evans	REC Code Manager	CE	OAM; Working Group Member
Rebecca Bennett	Centrica	RB	Working Group Member
Aleksandra Maczka	REC Code Manager	AM	Working Group Member
Brady Hindmarch	Octopus Energy	BH	Working Group Member
Helen Clarke	Stark	HC	Working Group Member

Beth Tatton	Calisen	BT	Working Group Member
Yvette Lawrence-Hood	Centrica	YLH	Working Group Member
Liz Kelf	Good Energy	LK	Working Group Member
Ralph Azagoh-Kouadio	F&S Energy	RAK	Working Group Member
Masa Delic Peranic	Utilita	MDP	Working Group Member
George Barnes	Utilita	GB	Working Group Member
Mia Burton	F&S Energy	MB	Working Group Member

1 INTRODUCTIONS

JH opened the meeting, introduced himself, and outlined his role in supporting the Change Proposal discussion.

JH explained the goal of this first session is to work through principles and assumptions to be established to support the working group's review of Export meter work arrangements. WG members were encouraged to share their views and considerations for future topics of discussion, which would feed into the work plan.

RG noted that there may be impacts to theft arrangements and the review of REC Schedule 8 – Unbilled Energy Code of Practice. JH acknowledged the feedback to be covered under topics of discussion.

2 DRAFT TERMS OF REFERENCE

WG members agreed to adopt the Terms of Reference. No objections were raised.

3 INTRODUCTION TO I0312

BA provided an introduction to REC Issue I0312 – Review of Export meter work arrangements. This Issue was raised by RECCo following a meeting of the R0207 – Import / Export MOA Charging Clarification WG, which looked to clarify Import/Export Meter Operator Agent (MOA) charging obligations within the REC. Members of that WG raised the need for a separate REC Issue to review the meter work arrangements between Import and Export Suppliers where there is a shared Metering Asset.

BA explained this Issue seeks to review the meter work arrangements within REC Schedule 14 – Metering Operations, which currently has a limited distinction between the activities for Import and Export metering. There is a lack of recognition within the REC as to how certain activities should be managed, whether they should be managed by the Import or Export Supplier, and communications between relevant parties. The impact of this lack of clarity within the Code

includes that industry parties do not have a consistent approach to managing meter works or investigating meter faults/issues where there is Import/Export metering present. The scope of the review is thus not limited to the review of REC Schedule 14, but also to other relevant provisions of the REC.

As part of this WG, a Change Report (Proposal Plan) was approved by Change Panel, which covered approximately 5-6 WG sessions, with future dates to be confirmed by the working group. A key output of the WG will also be to propose legal text changes to the Code.

4 PRINCIPLES AND ASSUMPTIONS

JH highlighted some terms to be used in this working group, with a key call out that the REC does not include the term 'generator'. However, for the purposes of this WG, this language is used to distinguish between the Consumer and the generator; the Consumer meaning the Import Supplier's customer, and the generator meaning the Export Supplier's customer. Members were encouraged to keep these definitions in mind, particularly when discussing specific use cases and to have a clear distinction as to which set of arrangements they were talking about.

JH gave an overview of the slide Market-wide Half-Hourly Settlement (MHHS) context (slide 11 of the attached pack). MHHS introduced a new Target Operating Model, which the industry should be completely migrated to in May 2027. MHHS has implemented a process where there is an associated Metering Point between the Import and the Export Supplier, this is linked within the Supplier Meter Registration Service (SMRS). Where the Import Supplier appoints its MOA, SMRS will automatically appoint the same MOA and Data Service for the Export supply. That will happen regardless of whether a contract is in place between the Export Supplier and the new Export MOA. The SMRS will automatically appoint the Import Supplier's agent to the Export Supplier for that Metering Point. Where there are changes to the data items that the Meter Operator is responsible for managing, they will then be required to automatically update that for both Metering Points and synchronise that data appropriately. For example, where they issue meter technical details to the Import Supplier, they also need to provide those installation details to the Export Supplier. This leaves a commercial gap where the MOA is required to provide services to a Supplier they do not have a bilateral contract with, so REC Change R0207 looks to introduce a commercial framework through the REC to support those arrangements. R0207 is currently in the final stages of the Change process and will be referred to Ofgem for Authority Determination.

R0207 proposes to introduce a new defined term to the REC, the Basic Associated Export MOA Services[1] and require the MOA to provide those services to the Export Supplier, regardless of a separate, bilateral contract in place and without requiring a direct payment. The services would

[1] Note that R0207 is yet to be approved for implementation. The proposed definition of 'Basic Associated Export MOA Services' means the services which an MOA is required to provide for an MHHS Metering Point under the following provisions of the Metering Operations Schedule, excluding any request for physical site visits:

(a) paragraph 20 (Sharing Information following Electricity Meter Works);
(b) paragraph 21 (Change of Energisation Status);
(c) paragraph 22 (Electricity MOA Appointment);
(c) paragraph 24 (Change of Advanced / Smart Data Service Agent); and
(d) paragraph 25 (Change of Meter Asset Provider).

be limited to certain sections in REC Schedule 14 – Metering Operations; to managing the appointment process and synchronising any relevant data. This excludes the requirement for the MOA to perform on-site services, or any bespoke commercial services for the Export Supplier without a separate contract. However, R0207 will allow for that Export Supplier to enter a bilateral agreement with that Meter Operator, and in doing so, provisions of that contract would prevail over the commercial arrangements within the REC.

JH clarified that whether R0207 is approved or rejected, either situation would allow;

- An Export MOA to reject a request for meter works where there is not a valid contract in place; and
- An Export Supplier to agree a contract with an Export MOA to complete meter works.

REC Issue I0312 thus seeks to determine whether there should be an agreement, restrictions, or provisions within the REC for scenarios where there are different Import and Export Suppliers and how services should be managed between them.

WG members did not raise any further feedback and were encouraged to join the Slido board for the discussion section of the session.

4.1 SLIDO – SHOULD BOTH IMPORT / EXPORT SUPPLIERS BE ABLE TO REQUEST METER WORKS FROM THE MOA, OR SHOULD THERE BE A LEAD SUPPLIER?

HC asked whether the situation was considered where there is a significant volume of supply difference between Import and Export. The situation may arise where the Import Supplier has little consumption compared to the Export Supplier, yet it is still the Import Supplier that appoints the MOA and the Export Supplier has no choice but to follow those arrangements. HC questioned whether there was a possibility, where there is a significant supply difference, of the Export Supplier being the lead Supplier and requesting meter works.

HC further noted that the Slido question tackles the question of should both Suppliers take control in requesting meter works, but the question should first address whether the Export Supplier can be the Lead Supplier to begin with. JH agreed that this should be explored as part of the WG. Solutions should consider if there are scenarios where the Metering Points should *not* be linked?

RB commented that both Import and Export Suppliers should be able to request meter works for the convenience and to remove any confusion for the Consumers. If a Consumer goes to their Export Supplier with a meter issue, but the Supplier rejects the request because they are not the Import Supplier or the lead Supplier, this creates an additional step for the Consumer and delays the resolution of their meter issue. To keep things simple for the end-users, both Suppliers should be allowed to request those works.

LK agreed with RB. They have come across problems with non-commissioned Smart Meters where they needed the Import Supplier to raise meter works, yet they have a lot of Export-only supplies. With MHHS tightening requirements, it is already difficult to commence with those works where they are not the lead Supplier, or able to request meter works. LK also raised the issue of rejections from MOAs, saying they can only accept meter work requests from the

Import Supplier. LK agreed that there should be equal opportunity for Import and Export Suppliers to raise meter works.

HC observed that this leaves the MOA in a situation where they receive a meter work request from the Export Supplier, but the Import Supplier they have a contract with has no knowledge of the request, so they are unaware of the MOP's activities. This may raise contractual issues for the MOA and their Import Supplier. JH noted that unless the Export Supplier enters into their own bilateral agreement with the MOA, the MOA has no obligation to accept the request.

HC clarified the concern is primarily that the MOA is doing meter works that the Import Supplier is not aware of and this potentially puts them in breach of one contract in order to fulfil another.

LW commented that, in addition to HC's comments, there also needs to be consideration of communications between MOAs if there are two MOAs (one for Import, one for Export) – where there are works requested by an Import or Export Supplier, how would the MOA communicate with the other MOP for the Import/Export supply, and how communications would be managed where there is a faulty meter. JH clarified that there would always be the same MOA, because they would be automatically appointed. If there was a different MOA, it would be because they were not associated and likely to be Export-only, with a separate meter and separate MOA under their own contracts. The WG's focus should be on the issue of same MOA, but different Import/Export supply.

4.2 SLIDO – IF THERE IS A LEAD SUPPLIER, IS THIS THE CASE FOR ALL METER WORKS, OR CERTAIN METER WORKS ONLY?

JH encouraged WG members to consider specific types of meter works, for example meter installation/exchange/removal, (de-)energisation, fault investigations, and whether both Suppliers should be able to request all kinds of meter works, or should this be limited to certain meter works only.

HC commented that if we allow for meter fault investigations to be requested by the lead Supplier, but the resolution to the fault is then to exchange the meter. This risks the MOA being in breach of its contract because it is not allowed to exchange the meter without the Import Supplier's agreement, but it cannot fix the meter fault as requested by the Export Supplier without doing an exchange. HC noted it might be simpler if arrangements simply allowed for both Suppliers are to either raise meter work requests or not raise them, with no restrictions around when to raise them.

Other WG members commented that the investigations should be carried out by the lead Supplier or the Import Supplier, the need to notify both Suppliers about certain works, as well as safety and theft issues to be considered separately. JH noted that there may be some considerations if the MOA is on site and identifies a safety issue, whether there are existing provisions within their contract with the Import Supplier that would cover that scenario.

RAK commented that both Import and Export Supplier would be using the same meter on site. Should anything happen to that meter, both Suppliers should be aware of the issue and if one were to request works from a MOA, by courtesy, they should notify the other Supplier.

4.3 SLIDO – IF THERE IS A LEAD SUPPLIER, IS THIS THE IMPORT SUPPLIER?

It was observed that a majority of the WG members (69%) considered the Import Supplier to be the Lead Supplier.

4.4 SLIDO – DOES THIS WORK WHERE THE EXPORT SUPPLY IS THE MAIN SUPPLY?

Following from the previous question, the slide raised considerations of, where the Import Supplier is the Lead Supplier, what arrangements should look like where the Export supply is considered the main supply. JH encouraged WG members who had previously voted no to explain their views further.

One WG member commented that the Lead Supplier should be the highest consuming. JH questioned whether this meant settlement volumes, exporting a greater volume of electricity than imported (therefore the Export Supplier would be the lead Supplier), or a larger capacity Export supply than Import supply (e.g. 1MW export capacity, 23kW import capacity).

LK noted that the risk of Export as the Lead Supplier is that, by its nature, it may not always be the lead supply. The WG should consider how to manage this if, for example, we had a wind turbine with a strong performing year but much lower consumption profile in subsequent periods. Linking the lead Supplier role to either Import or Export based on consumption comes with risks. LK proposed potentially decoupling the two roles completely. For example, if there is a large generator, they may want to manage the metering and the relationships of all the Agents separately. In this scenario, it is also difficult to say who the 'main/lead' supply is if that changes throughout the years.

No other views or use cases were raised.

4.5 SLIDO – WHAT COMMUNICATION IS NEEDED BETWEEN THE IMPORT AND EXPORT SUPPLIER?

The final two questions focused on communications around notifications, firstly looking at communications between the Import and Export Supplier directly, and not involving the Meter Operator.

RAK noted that, when the requesting Import Supplier sends an investigation flow, for example a D0001, to the MOA and requests that they go to the site and investigate the meter, the requesting Supplier should also send the D0001 to the other Supplier. This notifies them that a request has been made to the MOA and that works are being carried out on a shared Metering Asset.

JH noted that some members have mentioned the use of SDEP in their responses (via Slido). While SDEP is a good channel for sending secure messages in an unstructured way, it is still completely manual. JH asked the WG whether these scenarios should still be managed manually by exception, therefore using SDEP as a possible tool, or whether some processes should be (semi-automated). JH also observed that a prevailing view from the WG seems to be that if there were to be works coordinated by one Supplier as the lead Supplier, there should be a mechanism for them to notify the other Supplier.

4.6 SLIDO – WHAT COMMUNICATIONS SHOULD COME FROM THE MOA VS SUPPLIERS?

WG members raised the possibility that the MOA could send a flow where they accept meters from one of the Suppliers, but this should only be allowed if the MOA has a contract with the requesting Supplier. Members also raised concerns that in the event that the meter is changed, there should be a requirement or arrangements ensuring that the appropriate flows are sent to both Suppliers. Members believe there should be a joint-up industry-wide solution.

JH noted these suggestions should be explored as part of the WG and included in the work plan, but also emphasised that any technical solutions should be future-proofed – considerations of the use of DTN vs DIP, and post-MHHS migration changes which may impact this.

5 I0312 – TOPICS FOR DISCUSSION

JH provided an overview of the initial topics for consideration of the I0312 WG. In its October 2025 session, the R0207 WG compiled a list of potentially impacted areas of REC Schedule 14 – Metering Operations. This has been shared in slides 20-23 of the attached slide pack and will be used to help guide the I0312 WG's review of Schedule 14.

Of the five parts of the Schedule, Part A – General Provisions and Part D – Operational Processes Electricity for MHHS Metering Points are likely to be most impacted. Part A sets out the general provisions and obligations related to Export Metering Points that will need to be reviewed after an I0312 solution is determined. Part B – Metering Equipment Managers is unlikely to be impacted as it is limited to the qualification of the accreditation of MEMs. Part C – Operational Processes Gas is unlikely to be impacted as I0312 is an Electricity-only impacting REC Issue. Part E – Operational Processes Electricity for Non-MHHS Metering Points will be removed from Schedule 14 upon completion of MHHS migration (M15 scheduled for May 2027). Given that I0312 is looking for an MHHS solution to a problem rooted in the complexity that comes from the auto-appointment process introduced by MHHS, Part E is out of the scope of this review.

Part D will be the primary focus of the I0312 WG review, looking at the future post-MHHS migration process and arrangements for Export meter works. JH clarified that a review of Part A would be conducted following the review of Part D. No objections or concerns were raised on this approach.

Slides 22-23 provide insight into some of the initial considerations to be covered by the I0312 WG, over the course of the next few months. WG members are encouraged to consider the need for any requirements or restrictions to Meter Asset installations, removals and exchanges, as they have started to do as part of this session's discussion.

JH noted that SIPs and Crowded Meter Room MOAs have been included in the scope of the review. There is a lack of clarity within the Code about SIPs being on-site and identifying an issue, whether to report this to the Import or Export Supplier, or both.

5.1 SLIDO – ARE THERE ANY USE CASES THAT SHOULD BE REVIEWED IN-DEPTH AS PART OF THIS WORKING GROUP?

WG members were encouraged to provide any examples of use cases to be reviewed, including any metering set-ups or other scenarios not raised in this session. Members were encouraged to also provide any edge cases they may have seen, experienced or may be particularly concerned about.

BA highlighted that the Slido questions are open to the WG members for another two weeks.

HC raised concerns about a scenario where both Suppliers are allowed to request meter works from the MOA, but requests are conflicting in nature or have conflicting SLAs. JH noted that this may also lead to considerations of whether all arrangements are best codified in the REC, or whether there should be a minimum agreed baseline within the Code and additional guidance to support commercial arrangements outside of the Code.

RAK emphasised the need for open, efficient communication channels between both Import and Export Suppliers so that where such issues arise, both Suppliers discuss requesting works from the MOA. This should also support in meter investigations and ensure all Parties are aware and on the same page about works on a shared Metering Asset.

One WG member noted including DNO interfaces and asset condition reporting in consideration for use cases. Another WG member noted Export New Connections as a potential use case. RB further clarified that they have had discussions with other colleagues in the REC around Export New Connections. When the metering service receives the IF-036, there is ambiguity within the REC of when they should provide and how to provide the Meter Technical Details. RB noted that although Schedule 14 includes a requirement for metering services to provide Meter Technical Details, there is no operational procedure provided.

JH noted that it would be helpful to understand in terms of the edge cases whether a Customer Direct Agent would generally tend to cover both the Import and Export, or would the customer could have a contract with one side and not the other. LK explained that they have come across sites where there is a direct contract on Export and the only way this can be managed is through unlinking the supplies and managing it as Export-only. They have also come across the scenario where there can be a shared Asset registering Import and Export under Customer Direct, where the relationship is with the same Agents and the Import Supplier often wants to resolve issues that will then help with the Export Supply.

One WG member noted that there may be cross code impacts, potentially on the BSC.

6 NEXT STEPS, DATE AND TIME OF NEXT MEETING

Action Item	Owner	Deadline/Notes
Draft work plan from members' feedback	REC Code Manager	Before next working group
Set up second working group session	Bela Ashworth	Date 03 June 2026, 11:00
Share high-level meeting summary	Bela Ashworth	13 May 2026
Accept bilateral feedback from participants	REC Code Manager	Ongoing – the Slido is open until 27 May 2026, but feedback is also welcome via Change.management@recmanager.co.uk

No objections raised to the proposed meeting date for the second session.

JH and BA thanked attendees for their engagement and feedback. Members encouraged to reach out via email for further discussion or confidential input (see contact details in slide 25 of attached slide pack).