RETAIL ENERGY CODE

MEETING MINUTES

MEETING	**RECPAB_24_0528**
DATE	**28 May 2024, 10:00am**
LOCATION	**Virtual via Teams**

Attendee	Representing	Initials	Role
Jon Dixon	RECCo	JD	Committee Chair
Amy Crowe-Lamont	Code Manager	ACL	Committee Secretary
Alice Williams	Consumer Representative	AWi	Committee Member
Anne Jackson	Gas Performance Assurance Framework Administrator Representative	AJ	Committee Member
David Brown	MEM Representative	DBr	Committee Member
Dorcas Batstone	Independent PAB Member	DBa	Committee Member
Fungai Madzivadondo	Distribution Network Operator Representative	FM	Committee Member
Paul Saker	Supplier Representative	PS	Alternate Committee Member
Simon Waltho	BSC Performance Assurance Representative	SW	Committee Member
Steve Arthur	Independent PAB Member	SA	Committee Member
Steve Verdon	Independent PAB Member	SV	Committee Member
Daniel Tarasco-Fittock	Supplier Representative	DTF	Alternate Committee Member
Tom Stuart	Gas Transporters	TS	Alternate Committee Member
Walter Carlton	Code Manager	WC	Performance Assurance Lead
Anton Moden	Code Manager	AM	Performance Assurance Lead
Lakshna Murali	Code Manager	LMu	Performance Assurance
Vaishnavi Sharma	Code Manager	VS	Performance Assurance Manager
Shelley Rouse	Code Manager (OAM)	SR	Operational Account Manager
Nirav Vyas	Code Manager	NV	Performance Assurance - Data
Andrew Waghorn	Code Manager	AWa	Performance Assurance Data & Analytics Lead
Nathan Chaplow	Code Manager	NC	Performance Assurance
Jason Brogden *(Attended for item 2)*	MHHS Programme	JB	MHHS Programme Representative

Attendee	Representing	Initials	Role
Laura Kennedy *(Attended for item 3)*	Elexon	LK	BSC Representative (PAF Lead)
Joanna Ashton *(Attended for item 4)*	DCC	JA	Head of New Services
Andres Alvarez *(Attended for item 5)*	RECCo	AA	Service Delivery Manager Enquiry Services
Elliott Dunn *(Attended for item 5)*	Xoserve	ED	Presenter
Sue Treverton *(Attended for item 5)*	Xoserve	ST	Presenter
David Addison *(Attended for item 5)*	Xoserve	DA	Presenter
Steve Brennan *(Attended for item 10)*	Code Manager (Change)	SB	Change Analyst
Holly Law *(Attended for item 10)*	Code Manager (Change)	HL	Change Analyst

1. REVIEW OF OPEN ACTIONS AND APPROVAL OF DRAFT MINUTES

The Chair welcomed attendees to the meeting of the PAB. Apologies were given for Sally Hardman (with alternate Tom Stuart in attendance), Karen Lee (with alternate Paul Saker in attendance) and Paul Everett (with alternate Daniel Tarasco-Fittock in attendance).

In addition, the PAB Chair and PAB Members would like to thank Kat Higby for all her contributions to the Performance Assurance Board as she moves onto a different role and resigns as the Elexon Performance Assurance Representative on the committee. The Code Manager can confirm that Simon Waltho is the new Elexon Representative and we welcome him to PAB.

After housekeeping amendments processed by the Code Manager, the PAB unanimously APPROVED the minutes from the previous PAB meeting on 30 April 2024. Five actions (RECPAB_24_0326_03, RECPAB_24_0326_05, RECPAB_24_0326_06, RECPAB_24_0430_03 and RECPAB_24_0430_02) were closed following a verbal update and information provided in the meeting papers.

The Code Manager provided PAB with a verbal update to RECPAB_24_0326_03 on how delays or other issues with technology releases will be escalated to PAB with sufficient information and notice. PAB Members were informed the following and the action subsequently closed:

- There are weekly reports issued to RTS from all Service Providers on REC Change implementation progress and frequent (weekly for DCC/GES, by exception for EES) meetings to

discuss the progress of service providers in getting ready for technology releases that relate to REC changes. Operational changes outside are reviewed either in the Switching CAB or on an ad-hoc basis following a service provider notification of a release.

- Concerns around missed deadlines are escalated to senior management at the contractor as well as to senior management in RECCo or DCC (the responsible Parties) by RTS.
- Where any sufficiently significant concerns are to be escalated for Performance Assurance consideration, this is communicated to the REC Party at the point of escalation by RTS. The assumption is that this will take place at least 10 days before PAB paper day, so that there is time to assess the facts, identify the appropriate course of action and if necessary draft a paper.
- Any further Performance Assurance action would involve a discussion at PAB. For any PAB decisions the PAB paper would be provided to the REC Party in advance for validation, before it is submitted to the PAB. Urgent matters could be raised as AOB, or a specific meeting held, although the preference is to use existing committee time where possible. REC Parties would be invited to attend the item at PAB discussing this matter.

2. MHHS PROGRAMME UPDATE FOR REC PAB RISK

JB joined the meeting.

In relation to RECPAB_24_0227_01, the MHHS Programme representative provided an update to PAB members on the risk raised by REC PAB around processes associated with incident resolution, the avoidance of data loss and what assurance there is for the central systems. This update highlighted how the MHHS Programme plan to prevent downstream impacts on REC services, such as CSS and EES. The action remains open as the MHHS Progamme will provide relevant periodic updates moving forward to PAB Members.

The MHHS Programme Representative confirmed that the risk raised at a previous PAB meeting has now been included on the MHHS Programme RAID Log (R829). The MHHS Programme Representative explained to PAB that there are currently no bespoke arrangements in the design baseline that refer to recovery of data across different services defined in the MHHS arrangements. Following discussions with St Clements Services, who provide the Meter Point Registration Service (MPRS) system used by Distribution Network Operators (DNOs) and some industry participants, Change Request 44 (under MHHS Programme governance) was raised to the Programme to clarify how MHHS Design will support a data refresh across multiple services. This would then allow the resetting and realignment of data if there was to be an incident. Change Request 44 resulted in the introduction of a new interface message (IF051) within MHHS arrangements to support the alignment of data.

PAB Members were informed that there has been another Change Request raised into the MHHS Programme (Change Request 45 under MHHS Programme governance) for St Clements to continue to

be able to support corrections to Supply Start Date in their Registration Services (MPRS systems). This is due to the existing capability lapsing with the introduction of MHHS, so Change Request 45 has been raised to retain the functionality within MHHS and provide consistency.

The MHHS Programme Representative emphasised that the main action that has been taken to support these changes is to provide an enhanced systematic approach for change requests to be raised and both changes have been taken to the Programme Steering Group. As both changes require to go back to the Programme Steering Group, an implementation date is yet to be confirmed.

A PAB Member queried how the MHHS Programme will provide PAB with updates to it continues to be sighted on the management of the risk going forward. The MHHS Programme Representative confirmed that they will provide relevant updates via a paper or verbal update, when appropriate, during future PAB meetings. The Code Manager suggested that once an implementation date has been confirmed for both Change Requests, an update is provided to PAB Members. A PAB Member enquired about the risk and the process in the interim period if the Change Requests are not implemented when the MHHS arrangements go live. A PAB Member further queried how customers will be affected and how any misalignments will be fixed if the Change Requests are not implemented when the MHHS migration starts. The MHHS Programme Representative responded that they hope for these changes to be implemented via the Change Request mechanism, but if not implemented for MHHS cutover, these will be transferred into Business As Usual (BAU) governance.

JB left the meeting.

In relation to RECPAB_24_0528_07, the Code Manager highlighted the impacts to REC Performance Assurance and how performance is reported and monitored under the REC for MHHS Early Life Support monitoring. These included impacts to existing data flows across the Data Transfer Network (DTN) and REC Schedules. The key objectives for REC Performance Assurance were set, with PAB and Code Manager intending to focus on:

- Parties updating their systems, processes, and controls to ensure they share information with the appropriate Market Participants on time and by the method specified within the REC. The core REC processes impacted by MHHS are sharing of MTDs and resolution of Switch Meter Read Disputes.
- Suppliers ensure appropriate MOAs are appointed at all times during the Meter Point's lifecycle.

Risks to be considered as part of Early Life Support monitoring were discussed that included MHHS processes not being fully implemented, Suppliers appointing Agents inappropriately, Parties not applying the correct processes for either legacy or MHHS arrangements, and MTDs not being populated correctly at the time of reverse migration.

A PAB Member raised a risk on the Switch Meter Reads Disputes process that should be considered, stating there is likely to be more disputed or missing reads as the market roles responsible for this process are moving from Agents to Suppliers. The Code Manager agreed to consider this risk as part of the whole approach to Early Life Support monitoring.

A PAB Member queried if the processes associated with the discussed risks have been reviewed and amended accordingly to mitigate the risks. Another PAB Member responded that the MHHS Programme have been through a design walkthrough and worked through amending these associated processes.

PAB Members agreed on the focus of REC Performance as set out for Early Life Support monitoring.

PAB Members:

- **NOTED** the contents of the update.

RECPAB_24_0528_01 – MHHS Programme to provide an update in relation to the outcome of the Program Steering Group for both Change Requests and confirm the implementation dates for both Change Requests.

RECPAB_24_0528_02 – MHHS Programme to define the likely impact(s) to customers and the retail energy arrangements if the Change Requests are not to be implemented or are delayed and transferred into BAU change governance.

3. MHHS UPDATE

LK joined the meeting.

The PAB Members were provided key updates on MHHS Qualification, and the paper was taken as read.

A PAB Member highlighted that there is different terminology used for the same thing and if there was an opportunity for consistency throughout the REC and wider initiatives. The PAB Chair confirmed that this was a known issue and potentially there is an opportunity for this to be done via the licensing of Code Managers and bring under one common framework.

PAB Members:

- **APPROVED** the Non-SIT Supplier and Agent MHHS Qualification Testing (QT) Approach and Plan (Annex 2 of the Qualification Approach and Plan (QA&P) produced by Elexon who are acting as the MHHS Qualification Testing Manager on behalf of BSC and REC.
- **APPROVED** the application of the Request for Information (RFI) Performance Assurance Technique (PAT) to System Integration Testing (SIT) Participants, where they are required to

demonstrate their plans to deliver changes required to support Programme Milestones ahead of the completion of their MHHS Qualification.

- **NOTED** the progress made by the joint working group formed of volunteers from the BSC and REC PABs to consider and propose solutions for requests made by Suppliers for potential exemptions from MHHS Qualification requirements.
- **NOTED** the update on the Pre-Qualification Submissions (PQS) received from REC Parties and the current state of play of the QT Wave Allocation.

LK left the meeting.

4. DSC COMC RESPONSE

JA joined the meeting.

The Code Manager highlighted to PAB Members that REC data is used in gas settlement, particularly information on switches. The Data Services Contract (DSC) Contract Management Committee (CoMC), which is part of gas governance, raised concerns that incidents relating to some switch status messages not provided to Xoserve by DCC were taking excessive time to resolve. The DSC CoMC wrote to the REC PAB to understand the measures being placed upon the Switching Operator to ensure performance standards are met and also proposed three improvements. The Code Manager drafted a response to the DSC CoMC and recommended PAB approval. PAB Members agreed that the letter should be issued, subject to incorporation of feedback provided.

A PAB Member queried what the impacts are given this issue as it is not clear in the initial letter or the response. The Code Manager agreed that the information provided by Xoserve and DCC did not provide detail on the impacts, and suggested the impacts included additional work for all Parties involved, impacts on settlement, and potential impact on consumers. The PAB Member highlighted that there are direct impacts on shippers who need to identify the amount of gas to input into the network. Where messages are missed the impact is in proportion to the amount of consumption of the affected consumers, and for large consumers this can have a significant impact on shippers. The Code Manager agreed to update the letter to reflect the impact, and to update the actions so that Xoserve and DCC need to work together to resolve any missing message identified, taking actions that are proportion to the impact.

PAB Members

- **APPROVED** the drafted response with any comments provided by PAB Members being updated in the document accordingly.

JA left the meeting.

5. GES DEEP DIVE

ST, DA, AA, ED joined the meeting.

As part of the Performance Assurance Operating Plan (PAOP) the Code Manager arranges for REC Service Providers to provide updates on the performance of the REC Services they deliver. PAB Members were provided the following update by RECCo and its service provider, Xoserve:

- Performance to date (summary provided by the REC Code Manager).
- Issues faced and action taken.
- Key successes.
- Priorities going forward.

From this update, it was highlighted to PAB members that there were multiple incidents related to performance below the SLAs. During investigation RECCo and its provider identified that nine of these related to the management of system change, which are controllable events. Since October 2023 improvements have been implemented which have resulted in a no human or process errors since then. Seven events were caused by failures of providers from which Xoserve procure technology, the majority being Microsoft related faults for which Xoserve are in discussion with the vendor to improve reliability. Three incidents related to volumes, two related to a large customer portfolio migration and others from the annual update to estimated consumption volumes referred to as the 'Annual Quantity (AQ) run'.

A PAB member queried what the impact of these incidences were. This reinforced to RECCo and its provider that the purpose of the GES service is to facilitate switching, that issues with responsiveness can directly impact customer outcomes, and that performance issues can result in query drop outs delaying or disrupting switching journeys

The RECCo Representative also explained the completion of database administration tasks were a key contributor to underperformance. The Code Manager challenged why database administration tasks or known activities such as the AQ Run were resulting in drops in performance and could not be sufficiently planned during maintenance windows, or scheduled more frequently to prevent drops in performance. The Code Manager recommended PAB approve a second Action Plan PAT to track actions the GES Provider are taking to improve performance levels in areas where they have consistently been below target since service go-live.

PAB Members:

- **NOTED** the contents of the update.
- **APPROVED** a second Action Plan PAT to track actions to be issued.

RECPAB_24_0528_03 RECCo took an action to confirm whether the historic under-reporting of traffic volumes across the GES API would have had any effect on usage charges in accordance with the REC charging statement.

ST, DA, AA, ED left the meeting.

6. STAKEHOLDER ENGAGEMENT

PAB has a role in overseeing the success of Code Manager Stakeholder Engagement, in ensuring that REC Parties are aware of their responsibilities under the Code and that Party Assurance engagement works. PAB Members were provided an update on the following items:

- Overview of the Stakeholder Engagement approach.
- Feedback received and service improvements.
- What has gone well, highlighting the collaboration of the Stakeholder Engagement and Performance Assurance team.
- The future initiatives to support areas of industry change.

A PAB Member highlighted that, from the update provided, the enhanced engagement approach with the Stakeholder Engagement team and the Performance Assurance team collaborating is positive.

The Code Manager confirmed that one of the future initiatives to support areas of industry change is to engage with TPIs in preparation for the mandatory regime that is currently in development (REC CP R0137). A PAB Member queried what the overall engagement looks like and if there is a plan confirmed on how the significant increase in stakeholders when Third Party Intermediaries (TPI) have direct obligations within the Code will be approached. The Code Manager confirmed that this is currently in development to build this process.

PAB Members:

- **NOTED** the key updates on stakeholder engagement activity within the REC Code Manager.

RECPAB_24_0528_04 – The Code Manager to reach out to Helen Delivett at the Ombudsman to understand any learnings from the roll out of t**he Alternative Dispute Resolution for Consumers scheme (**ADR) that may be applicable to the introduction of TPI mandatory requirements.

7. PERFORMANCE AND SERVICE PROVIDER ASSURANCE

PAB was provided with the monthly update on Party and Service Provider Assurance activity, including Performance Assurance Techniques the Code Manager wishes to issue to Parties, and a discussion with PAB members on MHHS Early Life Support monitoring.

A PAB Member enquired about Risk Driver 8.10 (Volume of Objections- Non-Domestic) where one Party is above threshold but due to having a high proportion of prepayment customers, the Code Manager has proposed that no further action is required. The PAB Member asked if there were any concerns in relation to their behaviour as they are consistently above threshold. The Code Manager explained that through our engagement we have established that the Party has a high proportion of prepayment meters where there may be debt, which can provide the basis for objections. The Code Manager has not identified any specific concerns and the Party is consistently performing at this level, so the Code Manager will continue to monitor and if there are any significant changes, Performance Assurance Techniques may be issued.

PAB Members:

- **NOTED** the key updates on Market and Party performance since last month.
- **NOTED** the data review and reporting based on the data received by 1 May 2024.
- **NOTED** the actions resulting from the data analysis of the Risk Driver and PATs applied.
- **NOTED** the status of Party data submission.
- **NOTED** the approach to MHHS Early Life Support monitoring.
- **APPROVED** the proposed Performance Assurance Techniques to be issued to relevant Parties.

8. CENTRALISED REGISTRATION SERVICE (CRS) PERFORMANCE CHARGES

The Code Manager recommended PAB approve the Performance Charges applied to the CRS Provider for the quarter ending on 31 March 2024 in line with the REC Performance Charge regime introduced from 1 April 2023 and the Performance Charges scale approved by the PAB in March 2023. PAB Members were informed that no exemption request was submitted, however, information provided to the Code Manager by DCC was shared via an appendix.

It was noted that REC Change Proposal R0092 and alternative proposal R0092A are with the Authority for decision and if accepted may change the CRS SLAs, with implementation expected November 2024, i.e. in the 3rd quarter of the 2024/25 reporting year. The Code Manager and DCC agreed to prepare a joint paper to the PAB on the implications for the determination of CRS Performance Charges in the interim period.

PAB Members:

- **NOTED** the contents of the update.
- **APPROVED** the Performance Charges to be applied to the CRS Provider for the quarter ending on 31 March 2024.

RECPAB_24_0528_05 - The Code Manager and DCC to prepare a joint paper to PAB on the implications for the determination of CRS Performance Charges in the interim period.

9. DATA ACCESS APPROVALS

PAB was presented with twelve Data Access Approval requests for Energy Consultants. The PAB determines access requests because the PAB is responsible for specifying REC Party, Non-Party REC Service User and REC Service Provider information security and data protection requirements under the REC.

PAB Members:

- **APPROVED** the proposed alterations to the Gas Data Access Matrix.
- **APPROVED** the implementation date of 21 June 2024.

10. PAB FORWARD PLAN

The PAB discussed and agreed the forward plan.

11. AOB

The Code Manager advised that following the reorganisation of government departments in February 2023, the Department for Business, Energy, and Industrial Strategy (BEIS) was split to form the Department for Energy Security and Net Zero (DESNZ), the Department for Business and Trade (DBT) and the Department for Science, Innovation and Technology (DSIT). BEIS' access to the Enquiry Services was "inherited" by DESNZ. The other successor departments also require Enquiry Services access and the PAB agreed that this should be enabled and extended to other government departments who may have a role in energy policy.

The Code Manager provided an update on the first payment cycle of the Payment Method Levelisation scheme that was due on 21 May 2024. Two Parties made their payment after the due date but as all due amounts were subsequently received by RECCo, no escalations were presented at PAB this month.

The Code Manager advised of a recent issue regarding an electricity Supplier exceeding Bulk Change of Agent volumes permitted under the BSC. These are set by the BSC Panel to ensure the Supplier Meter Registration Service (provided by the DNOs and governed under the BSC) can manage the volumes without any adverse impacts to the service. The REC Metering Operations Schedule (Schedule 14) refers Parties to follow the processes set out under BSCP513 for Bulk Change of Agent. Through working with the BSC Performance Assurance team, it was identified that the obligations within BSCP513 may require clarification to remove any ambiguity which may have led to this issue. This matter was brought to PAB for information and no further action is required to be taken under the REC.

12. NEXT MEETING DATE

The next meeting of the PAB will be held in person on 25 June 2024.