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REC CHANGE ISSUES GROUP
MEETING MINUTES

MEETING	**RECCHIG_25_0306**
DATE	**06 March 2025, 10:00**
LOCATION	**By teleconference**

Presenter	Representing	Initials	Role
Paul Witton-Dauris	REC Code Manager	PWD	Chair
Caroline Freimuller	REC Code Manager	CF	Lead Analyst
Harriet Truss	REC Code Manager	HT	Lead Analyst
Lydia Bentley	REC Code Manager	LB	Lead Analyst
Luke Coyle	REC Code Manager	LC	Lead Analyst
Lorna Mallon	REC Code Manager	LM	Subject Matter Expert
April Harbour	REC Code Manager	AH	REC Technical Services
Harry Firth	REC Code Manager	HF	Secretariat

Full attendee list available upon request.

1. INTRODUCTIONS

The Chair welcomed attendees to the REC Change Issues Group (CHIG) meeting.

2. CONFIRMATION OF AGENDA

The Chair invited any additional items of business for consideration during the meeting, but no items were raised.

3. APPROVAL OF THE PREVIOUS MINUTES

The Chair invited attendees to provide comments on the draft minutes from the meeting which took place on 06 February 2025. HF advised that no comments had been made prior to the meeting. There were no comments, and the minutes were approved as an accurate reflection of the meeting.

4. I0241 – MHHS INCREMENTAL CHANGES FOR GO LIVE

HT provided attendees with an overview of the Issue. HT advised that this session would focus on a deeper dive into scope items within I0241, with four specific sections: Related Metering Points during Migration, Programme Design updates, EES API Consequential Change and Energy Market Data Specification (EMDS) Code Corrections.

Related Metering Points under MHHS

HT outlined the new Data Integration Platform (DIP) market messages IF-019 and IF-020 which will replace the existing DTN messages to establish or amend Related Metering Point relationships. HT also took attendees through the relevant sections of the DEL961 Migration Design Document, particularly Section 9 and parts of Section 13 relating to the new Market Messages.

HT advised that the current Code drafting of the REC MHHS Migration Schedule from R0209 - Implementation of Market-wide Half Hourly Settlement (MHHS) Arrangements is consistent with the rest of the Schedule and Section 9 of the Migration Design Document. HT added that the only question would be whether an MHHS Metering Point and non-MHHS Metering Point could have a relationship, but assuming that there cannot be a relationship, there will not be any expected new drafting requirements. A poll posted in the meeting returned a strong agreement from 94% (16 of 17) of responses that there cannot be a relationship between an MHHS and non-MHHS Metering Point.

HT advised that REC Schedule 28 – Related Metering Points does not currently specify whether a relationship can or cannot be created across MPANs that are and are not MHHS Metering Points. They suggested that a potential clarification could be included here. A poll posted in the meeting returned a unanimous agreement from 18 responses that a clarification in the REC would be helpful. Another poll returned a unanimous agreement from 15 responses that this clarification should be included within Schedule 28 rather than the Migration Schedule.

Programme Design Updates

HT advised that there are four Design Issue Notifications (DIN) that require REC drafting updates as part of I0241. HT advised that these changes to the MHHS Design have already been approved by the MHHS Programme, with I0241 bringing the REC Code drafting up to date. HT added that an extract of the DIN log will be uploaded to the I0241 REC Portal Page.

HT took the attendees through each of the four DINs in detail. HT advised that the proposed Code Manager recommendation is that there will not be an impact assessment required for these four I0241 scope items, with the hope that attendees would confirm that they believe these items to be in scope for the M8 Change Proposal.

A poll posted in the meeting asking attendees if they were comfortable with no impact assessment for these four scope items returned a unanimous agreement from five votes. Another poll asking attendees if they were comfortable with these four scope items being included within the Change Proposal returned a unanimous agreement of six votes. The Chair noted the lower levels of responses in these polls and suggested that attendees may need to

take away these questions. HT suggested that a high level question could be included in an impact assessment for I0241, without the need for a full impact assessment on these scope items. The Chair agreed.

EES API Consequential Change

HT advised that the proposed corrections to the EES API Technical Specification were developed as part of a REC MHHS Consequential Change rather than as part of the MHHS Design itself. They added that the updates and corrections required to the Specification to meet the API technical build were identified during testing by MHHS Programme participants.

HT took attendees through the four identified corrections in detail. HT asked attendees if they thought industry should have the opportunity to review these scope items through an impact assessment. The poll received 13 responses, with 92% (12) indicating support for an impact assessment. Another poll asking whether attendees supported the inclusion of these scope items within the Change Proposal returned unanimous support from 11 responses.

EMDS Corrections

HT advised that there was an issue identified regarding updates made to translate the MHHS Design into the MHHS version of EMDS. HT added that the Code Bodies had now identified all the discrepancies between the EMDS and MHHS Design. HT advised that a full list of the REC impacting identified issues is available on the I0241 REC Portal Page.

HT advised that the proposed Code Manager recommendation is that no impact assessment is required for these scope items. A poll posted in the meeting returned five responses, with 80% (four) supporting that no impact assessment is required. HT noted the low number of responses and suggested that a high-level question on the EMDS corrections in the impact assessment may be useful. Another poll asking if attendees were in support of these scope items being included within the Change Proposal received unanimous support from eight responses.

Next Steps

HT advised that two new items had been provisionally included within the scope for I0241: 'Qualification vs Service Activation' and 'New Connections between M10 – M14'.

HT advised that for the New Connections item, a decision had been published by the MHHS Programme last week. The Code Manager is expecting it to result in design changes and also an update in the REC Code drafting. A Metering Equipment Manager representative asked whether this is a final decision from the MHHS Programme. HT responded that it was based on responses to a Programme Participant Information Request issued by the MHHS Programme and it was understood to be a final decision. A RECCo representative added that any outstanding questions on this decision would be best answered by directly contacting the MHHS Programme Design team.

HT advised that the next steps will be to issue the impact assessments for the Related Metering Points and EES API Consequential Changes in due course. They added that the outstanding drafting for the Programme Design updates will be completed, and the two new data items will be developed further. HT advised that I0241 will be on the agenda for the next

Change Issues Group meeting on 03 April and added that they will give a view of the impact assessment responses received by the Code Manager.

The Chair and HT encouraged attendees to get in contact by emailing Harriet.Truss@recmanager.co.uk if they had any questions or issues with the content covered in this meeting. They thanked attendees for their interactions with the polls.

5. I0235 – MISSING SCENARIO VARIANTS IN DO179

CF provided attendees with an overview of the Issue. CF advised that currently REC Schedule 14 – Metering Operations specifies four scenarios for the sending of D0179, the confirmation of Energisation/De-Energisation of Prepayment Meter Market Message. CF added that two scenario variants, from Distribution Network Operator (DNO) to Meter Operator Agent (MOA) and from MOA to DNO are missing from the Data Specification. They added that two scenario variants, from DNO to the Smart Metering Service, and from the Smart Metering Service to the DNO, are missing from the MHHS Data Specification. CF advised that these four missing scenario variants will all be added as part of the solution to I0235.

CF advised that there are three Data Items listed as mandatory within the D0179, that the Proposer has suggested should be changed to optional as the DNO and MOA may not have the information to populate these fields. These are:

- Credit Balance (DI50260/J0537).
- Standing Charge (DI50264/J0543); and
- Prepayment Unit Rate (DI50263/J0542).

CF advised that a DNO had flagged that the DNO to MOA Scenario Variant had been previously removed as part of Master Registration Agreement (MRA) change CP2891 and had queried whether it is appropriate to add it back into the data specification and whether it should be removed from Schedule 14. CF advised that the Code Manager have had a conversation with RECCo and added that whilst it is not clear why this Scenario Variant was added back in under transition from MRA to REC, RECCo have confirmed this Scenario Variant is needed for MHHS, so had supported that it should be added to the Data Specification.

A Supplier representative advised that they have never received a D0179 from a DNO when a site has been de-energised, and that a DNO would send a D0139 instead. They added that they see a lot of DNO-led de-energisations on their portfolio.

A DNO representative added that it would be rare for a DNO to send a D0139, and there would not be a scenario where a DNO sends a D0179. They added that the only occurrence where a DNO would be involved in the energisation process if it was a large site and the DNO were managing the metering equipment, but this would not be a prepayment site if it was large. CF asked if there was a scenario where the DNO visited a customer's property and had to de-energise because it was actively unsafe. The DNO responded that they would probably disconnect it.

A Supplier representative queried that given D0179 only applies to traditional pre-payment meters, and the continuous transition over to smart metering, whether it is worth keeping at all.

CF responded that they would have to speak to the MHHS experts at RECCo to determine whether D0179 can be taken out of the MHHS design.

CF advised that a party impact assessment for I0235 was open to responses until 28 March 2025 and encouraged all DNOs, MOAs and Electricity Suppliers to respond.

6. I0228 – ECOES API FOR EXPORT MPAN CREATION AT SCALE

LC provided attendees with an overview of the Issue. LC advised that currently the REC outlines that only 50 Export MPAN requests can be made per day per Supplier MPID, and going over that limit would require a bilateral agreement between the DNO and Supplier. LC added that the Proposer is aiming to scale up their Export MPAN portfolio by 50% and are already averaging approximately 150-200 Export MPANs daily.

LC advised that a call had taken place with DNOs on 18 February to start developing some solution requirements. LC advised that the feedback received in that call was the current threshold of 50 Export MPANs had not been identified as a major cause for concern. They added that this expected to be a temporary issue as historic Export MPAN creation requests are processed, reducing the backlog.

DNO representatives advised that once the backlog for registering Export MPANs is cleared, they do not see a problem with the current process or limit adding that they have always been able to reach an agreement with a Supplier if the limit is not enough. They added that the current process works well from a safety perspective as when an Export MPAN is registered, the correct certification is received to ensure it has been properly connected to the network.

A Supplier representative asked the DNO representatives about requesting bulk Export MPANs for new connection housing estates, what would the process be for requesting these MPANS if the housing developers were planning to install solar panels on each property. A DNO representative responded that there is an ENA defined template for multiple sites available on a number of DNO websites, which allows builders and developers to provide that information up front to the DNO. Another DNO representative advised that it is difficult for the developers to be accurate with the number of Export MPANs required for the new connection builds as the number of properties with solar panel to be installed is not known at that point in the process.

LC asked attendees whether this line of enquiry is worth pursuing by the Code Manager, following the feedback in this meeting and previously. LM added that the required development for this Change will be impacted by the current Code freeze. LM also stated that there are already Change Proposals waiting that will have a higher Consumer and Market benefit than a solution to I0235. A DNO representative agreed, adding that this issue could be revisited in the future if it becomes an apparent problem. A poll posted in the meeting received 14 responses, with 78% (11) agreeing that this line of enquiry is not worth pursuing.

7. I0214 – MULITPLE SWITCH REQUESTS INCREASING OBJECTION RATE

LB provided attendees with an overview of the Issue. LB advised that since the December Change Issues Group meeting, the Code Manager have updated the scope and solution requirements of the Issue, with the aim that attendee feedback in this meeting will help shape the solution development going forward.

LB advised that the Code Manager is now looking into the Domestic market, and whether repeated manual registration attempts should be within scope, with the hope of implementing a solution that will solve the issues caused in both the Domestic and Non-Domestic markets.

LB advised that the Code Manager are considering changing Schedule 23 – Registration Services to include an amendment that will clarify how Switch Requests made subsequent to an objection can be raised. They added that 2 options are currently being considered:

Option 1: A time period [x] within which a gaining Supplier cannot raise another Switch Request following an objection; and/or

Option 2: A restriction on a gaining Supplier from submitting a Switch Request until they reasonably consider that the reason for the previous objection has been resolved.

LB advised that these options would likely be placed in Section 2: Submitting Switch Requests. They added that they have held conversations with legal counsel and Ofgem on these options, and that Ofgem are happy this will not have a significant impact on the Supply License Conditions.

LB advised that the time period X mentioned in Option 1 will be based on the average time period for resolving an objection cycle and the Code Manager will take a data-driven approach to determining this time period.

LB advised that the Code Manager had noted that some of the objection communications sent from different Suppliers varies greatly and suggested that a guidance document could be created to encourage a more unified approach.

LB asked attendees if they had a preference between either option, or if they had a view on an appropriate time period for Option 1.

A Third Party Intermediary (TPI) representative advised that they were concerned with the time period meaning there will be a period of not being able to raise another Switch Request for a certain period and in effect being locked out. They added that for Consumers looking to Switch Supplier for a better price, these potential lock outs could expose Consumers to higher prices. LB responded that they understood that a solution needs to strike a balance between reducing the current levels of objection communications and not delaying the overall process. They added that the Code Manager would base the time period off of the average time to currently resolve an objection.

A TPI representative asked if the Code Manager had looked into issuing a subject assess request to all Suppliers about their automated objection processes. LB responded that the Code Manager had considered an Information Request to see how much quantifiable data they can get to look into this Issue but added that given the high demands already on Suppliers to supply data and the level of MPAN-level data that the Code Manager would want, they had not taken it forward. LB asked attendees to feedback if they thought an Information Request of this nature would be useful.

A Supplier representative queried whether it could be a small number of Suppliers causing this issue and whether the Code Manager has held conversations with the Performance Assurance team about the data they hold on this Issue, and whether the solution will be to target these few

Suppliers to change their current automated objection processes. LB responded that their next step will be to speak to Performance Assurance to re-explore the root cause of this issue and if it is a small number of Suppliers only. A Performance Assurance representative added that they have identified some parties who have used the process inappropriately and have worked with them. They added that although they do not have perfect information on this issue, they will be using the data they have to support the Change team on a potential solution.

A TPI representative asked if the Code Manager considered an approach to provide further communications or guidance to Suppliers to further educate on the objections process Several attendees queried whether the process is at fault and if the Code Manager's proposals would be an overblown response. A Performance Assurance representative responded that the Code Manager always considers a range of different interventions and will want to find the approach that is most proportional to the problem. They added that if they find that the lack of understanding is the root cause, the Code Manager will be happy to provide more guidance to the impacted parties.

A TPI suggested that the removal of the five-day objection window has caused a lot of these issues, as there are now far more repeated objections. LM responded that it was removed as part of the Ofgem Faster Switching programme and looking at that would have to be a separate change.

8. TARIFF INTEROPARABILITY

LM advised that following conversations held with Suppliers and providers of Demand side response on how to best share data on Consumer Switching, the Department of Energy Security and Net Zero (DESNZ) have created a Tariff Inoperability solution, working with the REC and RECCo as the current preferred option to provide an API which will allow this information to be published. LM advised that although these timeframes are to be confirmed, the initial plan is for the REC change to be raised in Q3 of 2025, and the consultation to be issued soon afterwards, with the aim of having the REC changes implemented by the end of 2025. LM advised that engagement on this Change has been taking place in the Tariff Interoperability Working Group.

LM noted the proposed scope of the Change as displayed in the meeting slides. An Energy Consultant representative noted that Classes 3-4 for Non-Domestic are within the scope and asked if this will be updated as these Classes will not exist post-MHHS. LM responded that this Change will be MHHS compliant. The Energy Consultant representative noted that classes 5-8 are not included within the scope and asked how a large and medium sized industrial site will be defined. LM responded that they would take this question away. A Supplier representative suggested that the connection type could be used in this instance as it is an enduring data item.

9. I0223 – RECONCILIATION OF UNALLOCATABLE TRANSACTIONS REVIEW

LC provided attendees with an overview of the Issue. LC advised that since the last Change Issues Group meeting and the responses received for the Request for Information, the Code Manager has been working on the solution requirements for I0223. LC advised that this solution would focus more on the electricity process as the Code Manager has identified some opportunities to align it to the gas process.

LC advised that there are a couple of questions they would be keen to hear feedback on to help with the ongoing solution development process. They noted that currently the Code is silent on what it is to be done with Unallocated Transactions for Supplier IDs that have been closed, but at the Backstop Date, had registerable Metering points that would have been eligible in an allocation run. LC asked if impacted parties had a view on this. A Supplier representative responded that the Unallocated Transaction should go to the Supplier who took on the Supply. Another Supplier representative disagreed and said it should be distributed based on the mutualised costs of the Supplier of Last Resort (SoLR).

Supplier representatives added that in the event that a Supplier withdraws from the market or is closing down old MPIDs, would that Supplier still be entitled to those payments. A Code Manager representative responded that this is a scenario that had been identified, and it would be included within the legal drafting for the I0223 solution.

LC also asked attendees how the Code Manager should monitor that Suppliers have ensured they have taken action to allocate these transactions prior to the Backstop Date. A Code Manager representative added that under the MRA, these transactions would have been reviewed on a regular basis to facilitate Supplier action, and this is something that could be reviewed as part of a solution. A Supplier representative responded that this is something they would take away to discuss internally.

10. AOB

The Chair invited attendees to provide AOB.

A Supplier representative asked for an update on R0173 – Improvements to the Theft Detection Incentive Scheme (TDIS). A REC Code Manager representative responded that Ofgem had published their decision on 03 March to send back R0173 for further assessment. They added that the Code Manager are considering the next steps, but it is expected that R0173 will return to the REC Theft Issues Group for reassessment.

USER TESTING VOLUNTEERS FOR R0080 – IMPROVEMENTS TO FAILED TO DELIVER CSS MESSAGES

AH informed attendees that in preparation for the implementation of the solution for R0080 in June, the CSS Provider is seeking volunteers to participate in User Integration Testing for the new API-based message resend process. AH advised that the testing period will run for 4 weeks from the end of May, although participants are not expected to be required to test for the full time period, just to schedule testing within that window. AH advised that any interested parties should reach out via email to april.harbour@capgemini.com or maxime.van-eyseren@capgemini.com.