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REC CHANGE ISSUES GROUP
MEETING MINUTES

MEETING	**RECCHIG_25_0403**
DATE	**03 April 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
Glenn Sheern	REC Code Manager	GS	Subject Matter Expert
Harriet Truss	REC Code Manager	HT	Lead Analyst
Lydia Bentley	REC Code Manager	LB	Lead Analyst
Lorna Mallon	REC Code Manager	LM	Subject Matter Expert
Maxime van Eyseren	REC Code Manager	ME	REC Technical Services
Sarah Jones	REC Code Manager	SJ	
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 March 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. I0213 – CREATION OF A MECHANISM TO ALLOW THIRD PARTIES TO REPORT OBJECTION ACTIVITY

GS provided attendees with an overview of the Issue. GS advised that I0213 has been raised to look at how Third Party Intermediaries (TPIs) could report non-compliant Objection activity. GS added that one possible solution would be a new submission page on the REC portal to allow Third Parties to submit evidence of non-compliant Objection activity, and that the REC Code Manager could use these submissions to investigate.

GS advised that the Code Manager are looking for feedback to help finalise the scope of this Issue and consider any other solution options or requirements. They asked attendees to discuss their current experiences of the Objection process, whether Third Parties should be able to report non-compliant Objection activity, and whether the suggestion solution would be viable.

A Supplier representative advised that they were unsure about the suggested solution as there were already existing mechanisms within the Performance Assurance team to monitor Supplier performance. Another Supplier representative added that the current method of escalating any issues via their Operational Account Manager (OAM) is effective. GS responded that allowing TPI Objections activity would be an additional mechanism for the Code Manager to utilise for monitoring reasons.

Several Supplier representatives advised that they had previously raised an issue of Objection reasons being removed since the move to the Central Switching Service (CSS) and suggested that reinstating these reasons would give Parties a better understanding of why Objections has been raised. GS responded that reinstating the Objection reasons could be an Issue that the Code Manager could investigate.

A Supplier representative raised concerns about what status would TPIs hold in relation to the REC, assuming that TPI accreditation is introduced. GS responded that in that case, TPIs would be able to sign up to the REC under the Code of Practice which could alleviate some legitimacy concerns, or alternatively, TPIs could be delegated authority from any REC parties they are involved with. They added that this is an issue that the Code Manager is considering.

A TPI representative provided attendees with an overview of the issues they are facing with no current mechanisms to raise Objections, noting the impact on Consumers. They added that it is not the intention to increase the reporting burden on Suppliers, but if a Supplier is improperly using the Objection process, the TPI should be able to report this. GS thanked the representative for their input.

A Supplier representative asked about the scope of I0213, and which Consumer types this would impact. They noted that Domestic and Micro-business Consumers have the right to go through the Energy Ombudsmen for alternative dispute resolution. GS responded that the scope is under consideration by the Code Manager.

A Supplier representative suggested that a solution is required for TPIs and suggested that OAM style system could be easily implemented that would be open to TPIs. They added that any solution should be simple and low-cost and would need to avoid any system changes in the run-up to MHHS, and it should not involve Suppliers due to the current monitoring mechanisms on Suppliers. GS responded that there is already an OAM that looks after TPIs that have signed up to the Code of Practice and the Code Manager is looking into extending this service.

A Supplier representative raised concerns that the precedence of any future implemented solution on the Objections process would cause impacts on other Supplier processes. They added that the Energy Ombudsman or Ofgem may be more appropriate to handle Supplier behaviour rather than the REC. GS agreed that this will need to be considered as part of any solution to I0213.

A TPI representative agreed that the solution needs to be low-cost and simple to avoid system changes and ensure a quicker implementation. They added that any solution will need to ensure a secure reporting mechanism is in place, as the TPI may need to provide Consumer information at MPAN level

5. I0241 – MHHS INCREMENTAL CHANGES FOR GO LIVE

HT provided attendees with an overview of the Issue. HT advised that the focus in this meeting would be on new scope items on New Connections, consequential change updates and Electrical Enquiry Service (EES) updates.

New Connections:

HT advised that Design Issue Notification 1140 looks at how new connections would be treated through the transition period. HT added that all Suppliers will need to be able to accept MPANs in the MHHS arrangements. HT advised that following a Programme Participant Information Request (PPIR), a decision was published on 27 February, to approve the no optionality option. They advised that this means all MPANs created after MHHS Go Live will be established as MHHS MPANs.

HT advised that following the approval of DIN-1140, an update will be required to the REC Code Drafting for the MHHS Migration Schedule.

HT advised that for any approved changes to the MHHS Design that have been impact assessed via a PPIR, these scope items for I0241 will not be impact assessed again by the REC Code Manager. They added that the Code drafting will be made available to Parties as soon as possible, currently the Code Manager is working with the Balancing and Settlement Code (BSC) to ensure that the Codes are aligned with their draftings. They added that the intention is to go through the Code drafting at the May Change Issues Group meeting.

HT advised that the Code Manager's recommendation is that there is no impact assessment required for this new scope item and that it is in scope for I0241. A poll returned 81% of votes (nine) agreeing that no impact assessment is required, while another poll returned a unanimous agreement from 17 votes that the New Connections scope item should be included for implementation at M8.

HT advised that for the New Metering Point Request tool within the Secure Data Exchange Service (SDES), it had been previously agreed to remove the Expected Profile Class and Expected Measurement Class data items. They added that discussions on DIN-1140 had identified that these legacy data items may still be required until M14 to support reverse migration. HT advised that the Code Manager's position is to continue with the removal of these data items as all new requests will be created in MHHS, but that they were open to input on this matter. There were no comments received from attendees.

Consequential Change Updates

HT advised that the Code Manager are considering two potential scope items for I0241 that capture alignments with the MHHS Design that were not previously included within the REC Code Drafting. These two scope items are listed below:

Missing Scenario Variants for D0383 and D0384

- Both D0383 and D0384 are included within the MHHS Design, and will be sent by the losing Meter Operator Agent (MOA) to the gaining MOA on Forward and Reverse Migration
- The MHHS Migration Schedule includes this obligation but does not include Scenario Variants to support Legacy MOA to Advanced MOA (and vice-versa). The Code Manager would not be intending to impact assess this, but it would need to be drafted into the MHHS Migration Schedule.

D0300 Meter Register ID note

- This is a clarification to a note already included within the Code drafting that is applicable to all Scenario Variants for D0300 – "Disputed Readings or Missing Readings on Change of Supplier"

HT advised that Code Drafting updates to include these scope items is in progress but is expected to be straightforward and will be shared in due course. They added that the Code Manager recommendation is that an impact assessment is not required and for these items to be included within the scope for I0241. A poll returned a response of 11 votes, with 90% (10) votes agreeing that neither item required an impact assessment, whilst another poll returned a unanimous response from 8 votes that both items should be included in I0241.

EES Updates

HT advised that two of the types of updates received by EES have not been separated in the REC Code Drafting. HT added that these updates are "Data Items updated on Secured Active" and "Data Items updated in real time" and that an update to the REC Code Drafting will be required.

HT advised that a recent Programme Change request had stated that the Annual Consumption data will be updated in EES rather than the Registration Service and that an update to the REC Code Drafting is required to align with the MHHS Design.

HT advised that the Code Drafting will be shared after the meeting and that the intention is to go through it during the May Change Issues Group meeting. They added that the Code Manager

recommendation is that an impact assessment is not required and for these items to be included within the scope for I0241. Two polls returned unanimous responses supporting both recommendations.

Service Activation vs MHHS Qualification

SJ advised that provisions within the REC relating to Reverse Migration reference MHHS qualification, i.e. when an MHHS Metering Point is registered by a Supplier that is not MHHS qualified, then the Metering Point will undergo Reverse Migration. SJ added that in the MHHS Design, the qualification status actually does not determine whether a Metering Point should be Reverse Migrated. SJ advised that after MHHS qualification, each Supplier will undergo Service Activation, which encompasses inclusion within Industry Standing Data (ISD). SJ added that the ISD effective from date determines the status of the Supplier and thus whether a Metering Point is Reverse Migrated.

SJ advised that currently this differentiation is not included within the REC Code Drafting and the Code Manager is working on two plans to align with the MHHS Design on Reverse Migration. SJ added that the current REC provisions are defined from the BSC, so RECCo are awaiting confirmation from the BSC to confirm if they will define Service Activation and then Plan A would be that the REC drafting is updated to cross-reference the BSC for consistency. SJ that a backup plan is being discussed if the BSC drafting is not updated. They added that Plan B would be for the REC to introduce additional definitions to ensure the provisions legally reflect the technical solution.

SJ added that the current plan is to bring the proposed drafting to the May Change Issues Group along with some more detail on how the Code Manager is planning to move forward with this issue.

Related Metering Points

HT noted that following discussions in the March Change Issues Group, an impact assessment on I0241 had been issued by the Code Manager which had included questions on Related Metering Points. HT added that following this impact assessment, the Code Manager are proposing an update to Schedule 28 – Related Metering Points to clarify that a relationship cannot be created between an MHHS Metering Point and non-MHHS Metering Point.

HT took attendees through the two responses received for the impact assessment for I0241. HT noted that both responses were provided by Distribution Network Operators (DNOs), who had both been supportive of the proposed change, had not identified any additional costs and had seen the benefit in adding the clarification. HT added that both responses had highlighted considerations of impacts on the Metering Point Registration Service (MPRS) and the consequential impacts for DNOs. They advised that the MPRS Provider had confirmed no MPRS impacts as the service is already built to the required specification. A MOA representative advised that they had assessed the proposed changes and determined there would be no impacts.

HT advised that the Code Manager recommendation is to continue progressing this solution and to confirm it in scope for I0241. Two polls returned unanimous responses supporting both recommendations.

EES API Consequential Change

HT provided a summary to attendees of the scope items agreed in the March Change Issues Group and advised that these had gone out in the recent I0241 impact assessment. HT advised that the two responses had been supportive of the proposed change, with no additional costs identified. HT added that the Code Manager recommendation is to continue progressing this solution and to confirm it in scope for I0241. Two polls returned unanimous responses supporting both recommendations.

Next Steps

HT advised that I0241 will be on the agenda for the next Change Issues Group meeting in May, with the intention to go through any new Code drafting. HT added that due to the nature of I0241, additional scope items could be raised that will need to be discussed before June, therefore there is a plan for an additional I0241-specific Change Issues Group meeting in May. HT added that more information will be provided on this additional meeting in due course.

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.

6. I0194 – CSS CHANGE TO ALLOW PREVENT OF REGISTRATION BY MARKET SEGMENT

HT provided attendees with an overview of the Issue. HT advised that this Issue was raised by BSC to introduce a method to prevent Suppliers operating outside their Market Segment based on the qualifications or exemptions that the Supplier has undertaken.

HT informed attendees of the progress made on I0194 to date. HT advised that the Code Manager have worked with the CSS Provider to identify two solution options, which differentiate on how the Market Segment data was sourced from either the Registration Service or Data Integration Platform (DIP).

HT advised that a preliminary impact assessment had showed that both solution options are complex, with expected long delivery times and costs of over one million pounds. They added that having been reviewed with the Technical Design Authority and Technical Expert Panel (TEP), both options were determined disproportionate in terms of cost and complexity for a backstop control, and neither will be progressed further.

HT advised that a reporting-based solution is now being pursued by the Code Manager. HT added that this will monitor MPAN count by Supplier by Market Segment, and will be included within an existing EES monthly extract sent to the Code Manager. HT added that this solution will use existing Performance Assurance techniques, and there is no REC Change required, although potentially a Category 3 change may be required. HT advised that the next step will be to present this solution to TEP ahead of implementation

7. I0222 – ESME ID UPDATE REJECTIONS

LB provided attendees with an overview of the Issue. LB advised that ERDA validation on the ESME ID Data Item is prohibitively strict, with only a single incidence of an ESME ID permitted in MPRS. LB explained that this is causing issue as it prevents Smart Meters from being re-used at different MPANs, accurate market-wide ESME ID data is needed for MHHS, and data validation errors cause operational issues for REC parties. LB advised that since the February Change Issues Group meeting, the Code Manager have narrowed down to one final proposed solution. They added that the proposal is a modification to the ERDA validation rules and alignment with MHHS ESME ID validation for the IF-005 for the D0312 market message.

LB advised that the Code Manager is proposing changes to the Enumeration list for D151544 – MOP Flow Response Code, the data item that responds to D0312. LB advised that this list includes Rejection Code V – the Code relevant to ESME ID validation. LB added that the Code Manager will also explore coordinated consequential change to MPRS validation riles to ensure that existing ESME ID validation functionality is maintained. LB added that the MHHS validation document may require an update to reflect these changes. They added that this may require a separate Change proposal, but this would be confirmed as part of an ongoing impact assessment with the MPRS Provider.

LB presented an overview of the proposed solution to attendees, including the current, initial proposal, and final proposed wording for Rejection Code V. LB advised that the proposed drafting of the Rejection Code V includes an “Effective To” date, so that it is clear that the ESME ID is safe to reuse and will no longer result in a validation failure. LB added that description character limits constrained the initial proposal.

A Supplier representative asked if when a rejection comes back and states which MPAN the ESME ID is already linked to, whether the Supplier will have to sort the duplication first. LM responded that the Supplier would have to fix it first. LM added that if the ESME ID is in MPRS, it should only be accepted if it has been end dated or it has an existing relationship. The Supplier representative asked if the Supplier should raise a query via SDEP if the ESME ID is rejected. LM confirmed this. The Supplier representative thanked LM and added that they have a lot of these cases. LM responded that it may require the DNO to be involved and added that the Code Manager would be happy to help out once the implementation date for I0222 is decided. They added that some examples have been provided by the Performance Assurance team which they would be looking into.

A Supplier representative raised concerns that they are completely dependent on other market participants, which is not a good solution for the end Consumer. LM responded that because it is close to the M10 implementation date, the solution options were limited, and the chosen solution was the only deliverable one within the timescales. They added that once MHHS has gone live, the Code Manager can look at this issue again.

A Supplier representative asked how they can fix any rejections on ESME IDs as they cannot search on EES. LM responded that the ESME ID and Meter Serial Number are tied together. The Supplier representative responded that this is relying on Suppliers correctly inputting the serial number and added that Suppliers need to be able to search via ESME ID on EES. They added that any solution needs to be introduced urgently as Suppliers have until mid-May to cleanse all existing ESME IDs. LM responded that at the moment, the Code Manager cannot implement any

changes to EES but could investigate this as a potential solution in the future. They added that they have checked to ensure this is the only data item for which the MHHS Programme has changed the validation and at the moment this is the case.

Supplier representatives asked if when an ESME ID is rejected, if the Supplier will receive the other MPAN that the ESME ID is linked to. LM responded that the Supplier will only receive Rejection Code V.

Next Steps

LB advised that the ongoing impact assessment with the MPRS provider will close in mid-April. They added that a consultation will be open from mid-April to early May, ahead of a decision at the May TEP meeting. LB advised that the implementation is planned to align with MHHS 10.

LB acknowledged some of the general broader issues raised by attendees with the ESME ID process in this meeting but reiterated that the I0222 solution is targeted to fix a specific problem and suggested that some of the broader issues are out of scope. LM added that once I0222 has been implemented, they will bring a paper to either the Change Issues Group or REC Issues Group later this year in the hope to target these broader issues.

8. I0191 – INTRODUCTION OF SLA FOR SUPPLIER DE-REGISTRATION ON DISCONNECTED METERS

CF provided attendees with an overview of the Issue. CF advised that the name of the Issue had been changed to closer align it to the proposed solution. CF added that there are a number of meters showing as Terminated but with an active Supplier appointment. They added that discussions at the REC Issues Group identified that the REC is potentially lacking obligations on Suppliers to report or respond to Disconnection queries and suggested that timescales be added to Schedule 27 – RMP Lifecycle. CF advised that the Code Manager is suggesting a timescale of 20 working days for Suppliers to submit the Registration De-Activation Request, or for Electricity to have raised a query with the DNO if they believe the Metering Point should not be disconnected.

A Supplier representative agreed that 20 working days would be a reasonable timescale, as it would provide enough time to determine whether the meter has been disconnected or not, and then the Supplier can submit the Request if needed.

Attendees raised questions about the Gas process and whether this is included within the scope of the Issue. CF confirmed that it is in scope and LM added that it will not include Supplier-led disconnections.

A DNO representative advised that they are in support of this Issue and asked if there will be any legacy cleansing for the current 45000 MPANs that are showing as Terminated but with an active Supplier appointment as of December 2024. LM responded that the solution is focused on preventing any further MPANs rather than cleansing the existing ones and added that they would take this suggestion away. CF added that they may need to talk to the Performance Assurance team to discuss the best way to deal with these 45000 MPANs. A Supplier representative agreed that these MPANs need to be dealt with and asked if there will be any

issues with Migration. A RECCO representative responded that MPANs that are terminated with an active Supplier are part of the Migration criteria.

A Supplier representative suggested that the same process would not be able to be implemented for Gas and Electricity as Gas Suppliers have the voluntary withdrawal process where they can remove themselves in settlement and then deactivate, but Electricity Suppliers do not have that same mechanism.

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

ME 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. ME 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. ME advised that any interested parties should reach out via email to april.harbour@capgemini.com or maxime.van-eyseren@capgemini.com.

10. AOB

The Chair invited attendees to provide AOB.

The Chair suggested that Change Issues Group meetings should be extended to three hours, to align with other REC meetings such as the REC Issues Group, and due to the increased number of Issues and engagement from attendees. A poll returned 31 responses, with 90% (28) supporting the extension of Change Issues Group meetings. The Chair confirmed that this would be implemented prior to the May Change Issues Group meeting.

The Chair suggested that presenters should notify attendees in the meeting chat when their section is about to begin, to encourage further engagement from attendees who wish to attend for certain Issues. A poll returned 25 responses, with 96% (24) supporting a notification in the meeting chat for each new item. The Chair confirmed that this would be implemented for the May Change Issues Group meeting.