RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

REC CHANGE ISSUES GROUP
MEETING MINUTES

MEETING	**RECCHIG_25_1204**
DATE	**04 December 2025, 10:00**
LOCATION	**By teleconference**

Presenter	Representing	Initials	Role
Holly Law	REC Code Manager	HL	Chair
Bela Ashworth	REC Code Manager	BA	Lead Analyst
Francine Peyroux-Sissoko	REC Code Manager	FPS	Lead Analyst
Harriet Truss	REC Code Manager	HT	Lead Analyst
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. No items were raised by attendees.

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 November 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. I0282 – RETURN OF LEGACY METERS

FPS provided attendees with a detailed overview of the Issue. FPS explained that the Proposer, a Distribution Network Operator (DNO) and legacy Meter Asset Provider (MAP), raised I0282 as they are contacted by several storage providers regularly requesting identification of ownership

for around 30,000 legacy meters. This requires serial number checks, notifications, accepting deliveries, and arranging for disposal—adding significant workload on top of business-as-usual activities. FPS added that this Issue is complicated as company names have changed over time, making it difficult for storage providers to identify the original asset owner. FPS also noted that approximately two-thirds of legacy meters have now been replaced by smart meters, which are operated by the DCC.

FPS advised that the Community of Meter Asset Providers (CMAP) was consulted in October. Their view is that this is not an issue for current MAPs, as there is a longstanding industry process and obligation for meters to be returned to the asset owner. This process is described in COMCoP and facilitated by the UKMF Meter Returns document. They added that the Code Manager may look into reviewing whether data access for storage providers is required.

FPS asked attendees whether they were aware of this Issue and what action(s) should be taken to prevent further problems. A DNO representative advised that they would investigate internally to determine if similar issues are being experienced and report back. FPS added that they would be grateful to any attendees sharing experiences or thoughts on the Issue after the meeting and encouraged feedback to be sent to change.management@recmanager.co.uk.

A DNO representative noted that legacy meters are unlikely to be reinstalled and suggested reviewing the CoMCoP process, as it may be outdated. They questioned the value of transporting redundant meters when recycling is the likely outcome. A Supplier representative recalled previous discussions about disposal costs, which fall to the asset owner. They emphasised the importance of recycling and compliance with environmental regulations. An AMO representative highlighted that meter operators are questioning the cost-benefit of returning versus disposing of meters, and that disposing is a cheaper option, with further cost-benefit analysis required. They added that this could cause a risk in situations where prepayment legacy meters are required as smart cannot be installed.

The AMO representative advised that the information to identify the MAP/ asset owner is held within D0303 data flows, but there may be an issue over data quality and questioned whether the commercial storage providers may lack access to these data flows.

5. R0287/A - CLARIFICATION AND AMENDMENTS TO ANNULMENT DEFINITION IN SCHEDULE 23 – ALIGNMENT WITH SLC OBLIGATIONS

BA provided attendees with a detailed overview of the original and alternate Change Proposals. BA explained that R0287 and R0287A have been raised to clarify and amend the REC wording on annulment to align with SLC 14.2(d), 14.4(c), and 14.10, which govern the annulment process in the context of customer switching. BA took attendees through the proposed changes to REC Schedules 1 and 23 for both Change Proposals, which seek to amend the definitions of “Annulment” and “Annulment Request”.

BA advised that both Change Proposals are currently out for consultation, with a deadline response of 02 January 2026. They asked attendees for any feedback on the Change Proposals, including whether any clarification is required ahead of submitting a consultation response.

Several attendees raised concerns about the scope of the alternate proposal. There was emphasis on the importance of strict alignment between the REC and the Standard Licence Condition (SLCs). Their view was that the SLCs are the primary legal authority, and the REC should not introduce processes or scenarios that go beyond what is permitted by the licence conditions. If the REC is expanded to allow Annulment in situations not covered by the SLCs, this could create regulatory risk for suppliers and undermine the legal certainty that the SLCs are meant to provide.

BA clarified the scope of the current consultation. The primary focus is on aligning the REC with the SLCs, which is proposed in R0287. The alternate proposal, which would expand the Annulment process, is recognised as a significant change that would require further industry discussion and possibly regulatory engagement. BA confirmed that any such expansion should be raised as a separate change proposal, with its own consultation and impact assessment.

The Proposer for R0287A responded that while the alternate Annulment proposal could have been a separate change, the current REC wording already allows the Losing Supplier to use Annulment with customer consent—including when a customer changes their mind. They suggested it is more logical to review and update the Annulment definition comprehensively now, rather than in separate steps, as the REC already covers scenarios where the Losing Supplier acts on the customer's behalf.

The Proposer for R0287A added that in the context of faster switching and the 14-day cooling-off period, it is more efficient and less confusing for customers if the Losing Supplier can process annulments directly. Otherwise, customers might have to switch for a day and then switch back, causing unnecessary complexity, meter reading issues, and risks for prepayment customers. The Proposer concluded that using the existing CSS solution for Annulments is the most reasonable and efficient approach.

6. CODE MANAGER ISSUE TRACKER UPDATE

HT provided attendees with an update of several Issues currently being progressed by the Code Manager. The full list of updates is available to view on the meeting slides on the REC Portal.

HT provided an overview of R0294 to attendees. HT advised that R0294 has been raised as an urgent Change Proposal to implement a new Data Integration Platform (DIP) Market Message, IF-051 'Data Refresh', which will be sent to both the Electricity Enquiry Service (EES) and the Market-wide Data Service. This change supports BSC CP 1607 which is already approved for implementation on 26 March 2026. The proposal will go to the Change Panel on 16 December to set the plan, with an impact assessment to be progressed at the earliest opportunity.

HT advised that one trigger for the new message could be updates by MPAS Super Users. To better understand usage scenarios and volumes, an information request will be sent to DNOs. in their role as Supplier Meter Registration Agents (SMRAs), in December, to be kept open until mid-January. This will ensure feedback alongside the EES impact assessment before progressing to a decision for a March implementation.

7. 2026 MEETING DATES

HF advised that all 2026 Change Issues Group meeting invites will be reissued to those on the distribution list. To receive invites, members must ensure they are signed up by emailing enquiries@recmanager.co.uk or committees@recmanager.co.uk.

HF advised that the January meeting is moved to 15 January 2026, to accommodate the post-holiday period. Subsequent meetings will be held on the first Thursday of each month. HF shared the proposed 2026 meeting schedule with attendees.

8. AOB

The Chair invited attendees to provide AOB. There was no AOB provided, and the Chair closed the meeting.