RETAIL ENERGY CODE

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REC CHANGE ISSUES GROUP
MEETING MINUTES

MEETING	**RECCHIG_26_0806**
DATE	**06 August 2026, 10:00**
LOCATION	**By teleconference**

Presenter	Representing	Initials	Role
Florentina Monea	REC Code Manager	FM	Chair/Lead Analyst
Bela Ashworth	REC Code Manager	BA	Lead Analyst
Caroline Freimuller	REC Code Manager	CF	Lead Analyst
Harriet Truss	REC Code Manager	HT	Subject Matter Expert
Francine Peyroux-Sissoko	REC Code Manager	FPS	Lead Analyst
Jonny Moore	Retail Energy Code Company	JM	Operations Consultant
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 02 July 2026. 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. I0292 - OBLIGATE ENERGY SUPPLIERS TO PROVIDE PHOTO EVIDENCE OF THEFT IN CONVEYANCE TO NETWORK PARTIES

CF provided attendees with an overview of the Issue. CF advised that I0292 proposes requiring Suppliers to share any photographic evidence of actual or suspected Theft in Conveyance with the relevant Network Party when such evidence is gathered during site visits.

Following an information request undertaken in March and April, five responses were received. Network Party respondents strongly supported the proposal, explaining that photographs obtained during Supplier site visits would significantly strengthen the evidence packs used in theft investigations. The two Supplier respondents noted that they rarely attend Theft in Conveyance visits, with one Supplier stating it had undertaken none in recent years. However, neither Supplier identified any significant concerns with taking or sharing photographs on the infrequent occasions such visits occur. Based on this feedback, the Code Manager decided to progress the Issue.

The proposed solution introduces a new requirement into Schedule 8 (Unbilled Energy Code of Practice). CF noted that the drafting closely mirrors the legal text approved under R0253 Theft – DNO/Networks not providing photos, which requires Network Parties to provide theft-related evidence, including photographs, to Suppliers. As R0253 has already been approved and is scheduled for implementation on06 November 2026, the drafting for I0292 has intentionally been aligned to ensure consistency and reciprocal obligations between Suppliers and Network Parties. Minor typographical amendments will be made before consultation, but no substantive changes are proposed.

The Party impact assessment (PIA) ran from 10 to 31 July 2026, and responses have been published on the REC Portal and are currently being reviewed by the Code Manager. CF invited any further comments from attendees before the proposal proceeds to consultation. The Issue is scheduled for Change Panel consideration on 18 August 2026 and, subject to Panel agreement that sufficient information has been gathered, the consultation is expected to open on 21 August 2026.

An attendee sought clarification on whether the proposed drafting would require Suppliers to undertake additional site visits in order to obtain photographic evidence. CF confirmed this was not the intention. The obligation would only apply where a Supplier is already conducting a site visit and identifies actual or suspected Theft in Conveyance. In those circumstances, the Supplier would be expected to use reasonable endeavours to take photographic evidence and provide it to the relevant Network Party. The proposal does not require Suppliers to increase the number of site visits they undertake.

5. I0285 - ORGANISATIONS WITH MULTIPLE ROLE TYPES WITH EES AND SDEP ACCESS

CF provided attendees with an overview of the Issue. CF advised that I0285 seeks to improve the Secure Data Exchange Portal (SDEP) user experience for organisations operating under multiple REC participant roles. Currently, where the same individual requires access to SDEP under different company groups or market roles, separate email addresses and logins are

required for each role. For example, a user working for both a Distribution Network Operator (DNO) and a Gas Transporter (GT) within the same organisation must maintain separate SDEP accounts and repeatedly log in and out to switch between roles.

The proposed solution would introduce an organisation-level structure within SDEP. Under this model, a single user account could be linked to multiple company groups, allowing users to switch between authorised roles without requiring separate email addresses or accounts. CF explained that this functionality is intended solely for SDEP and will not be extended to the Electricity Enquiry Services (EES).

CF noted the ongoing work to provide GTs and Metering Equipment Managers (MEMs) with SDEP access through R0162 Access to SDES for Gas Networks. CF added that progression of R0162 has been paused while I0285 is considered, as implementing the enhanced functionality first would provide a significantly better user experience for GTs when they are eventually onboarded. The proposal also supports implementation of R0253, which requires sharing theft-related evidence via SDEP where possible.

A further element of the proposal introduces a new Organisation Master Admin User (Organisation MAU) role. While individual company groups will continue to have their own Master Admin Users responsible for managing users and passwords, the Organisation MAU will sit above them and be able to manage all company groups within the organisation. The same individual may act as both Organisation MAU and Company Group MAU if an organisation wishes. Organisation MAUs will be able to add users across multiple company groups, whereas individual company MAUs will remain restricted to managing their own company group.

An attendee sought assurance that the proposal would not inadvertently allow inappropriate sharing of access rights between different market participants. They highlighted concerns arising from organisations holding multiple Market Participant Identifiers (MPIDs) and the importance of maintaining clear access boundaries. CF confirmed that company groups could only be linked under a common organisation following validation by the REC Operational Account Management team, including checks against Companies House information and other existing verification processes. This was intended to ensure organisations are only linked where legitimately connected.

The attendee also asked whether existing MAUs would automatically receive organisation-level permissions. CF clarified that this would not be the case. Existing administrators would retain their current company-level roles. Organisations wishing to utilise the new functionality would need to nominate an Organisation MAU as part of a migration exercise conducted during implementation.

An attendee requested clarification on the timescales for stakeholder feedback. CF confirmed that the PIA is open until 28 August 2026, with stakeholders encouraged to contact the Code Manager directly if they require clarification before submitting responses.

CF also highlighted several implementation considerations arising from the Service Provider impact assessment. The proposed solution depends on functionality being developed under R0122 - SDEP Review Improvements (2) - Usability, which must be built before R0285 can be

developed. However, R0122 does not need to be fully implemented before development work on R0285 can commence.

The Service Provider estimated a one-off implementation cost of approximately £106,000 for design, build and testing, with no ongoing support costs. Delivery is expected to take approximately 25 weeks. The PIA specifically seeks stakeholder views on whether this expenditure and implementation timescale are justified, particularly in light of the ongoing Enquiry Services Evolution Project. CF noted that implementing R0285 before that wider project concludes could result in similar functionality needing to be built twice, once in the current solution and again within the future platform. Stakeholders are therefore being asked whether they consider the functionality sufficiently urgent to justify that potential duplication of costs.

The PIA opened in early August and will remain open until 28 August 2026, with the extended period reflecting the summer holiday season. Following review of responses, the Code Manager will assess whether any changes to the solution are required and develop a business case considering cost, benefits, implementation timescales and wider programme dependencies. An update will then be provided to the Technical Expert Panel no later than its October meeting.

6. I0325 - POST-MHHS FULL TRANSITION COMPLETE (M15) REC UPDATE

FPS provided attendees with an overview of the Issue. FPS explained that I0325 aims to remove obsolete Market wide Half-Hourly Settlement (MHHS) transition arrangements from the REC once all MHHS migration activities have fully completed. FPS explained that the REC was amended to support MHHS implementation and transition, with impacted metering points migrating through defined industry processes. Once migration is complete, many of the temporary and legacy provisions included to facilitate the transition will no longer be required and should be removed to ensure the REC remains efficient and proportionate.

The proposed solution involves a comprehensive review of REC documentation to identify and remove redundant MHHS transition arrangements. This includes amendments to Category 1 REC documents, Category 2 products, Category 3 products, and the EES. The review will also extend to Data Specification' s Market Message and Data Item Catalogues. Areas expected to be affected include references to MHHS and non-MHHS metering points, transitional market participants, legacy migration processes, redundant Data Items, scenario variants and Market Messages.

The Code Manager will also assess consequential impacts on guidance materials, Qualification products, Performance Assurance documents, portal content, process maps and other supporting artefacts. Although parallel reviews are expected under other industry codes, including Balancing Settlement Code (BSC) and Distribution Connection and Use of System Agreement (DCUSA), FPS noted that cross-code activity should not affect development of the REC solution itself.

The current expectation is that no REC changes would be implemented until after the MHHS Programme's M15 milestone, which is presently scheduled for 07 May 2027. Implementation timings will be confirmed as part of the solution development work.

An attendee raised concerns about linking implementation too closely to the currently published M15 date. They noted that late migrations or changes to wider MHHS programme milestones could result in a situation where some Metering Points remain on legacy arrangements even if programme timelines change. In those circumstances, removing transition arrangements too early could create operational risks.

JM explained that the intention is not to tie implementation to a fixed calendar date but to the achievement of the M15 milestone itself, which is defined as the point at which all applicable Metering Points have completed migration from legacy arrangements. If migration activity remains incomplete, the milestone would move accordingly.

HT reinforced this position, confirming that the date referenced in the paper was indicative rather than a committed implementation date. They explained that delivery decisions would remain aligned to programme progress and the practical readiness of the industry. Options could include implementing the change in the first available release after M15 or selecting a more appropriate date once programme completion is clearer. They emphasised that the intention is not to remove any REC provisions while they are still required for live migration activity.

FPS noted that the project is currently in its solution development phase running until October, following approval of the proposal plan by Change Panel in July. Attendees were encouraged to review the proposal documents on the REC Portal and provide feedback on any additional scope areas or potential impacts that should be considered as part of the development of the final solution.

7. R0328 - REMOVAL OF D0383 & D0384 REQUIREMENTS FROM SHARING MTDS PROCESS

CF provided attendees with an overview of the Change Proposal. CF advised that R0328 is a proposed housekeeping change to correct drafting errors within Schedule 14 (Metering Arrangements Schedule) and Schedule 34 (MHHS Migration Schedule).

Under the current REC drafting, Meter Operator Agents (MOAs) are required to send the D0383 and D0384 data flows to a range of parties, including Suppliers, Data Services, DNOs and Data Collectors. CF explained that this requirement was introduced in error during MHHS drafting. The obligations do not align with the legacy arrangements, where the D0383 is not required by any of these recipients and the D0384 is only required by the Supplier. These incorrect obligations were identified during MHHS implementation and recorded on the defect and issues log for correction through a post-implementation change. The proposed solution is therefore to remove the erroneous obligations from the relevant REC schedules.

CF noted that this is a legal text-only correction. No system or process changes are required because the corresponding scenario variants do not exist within Energy Market Data Specification (EMDS). As a result, MOAs are unable to send these data flows to the affected Parties even if they attempted to do so, meaning the change simply aligns the REC drafting with existing operational reality.

An attendee sought confirmation that the proposal only removes obligations relating to MOA-issued flows and does not affect instances where DNOs or other Parties are required to send data. CF confirmed that only MOA-to-Party obligations are being removed, and all other existing data flow obligations remain unchanged.

CF advised that the proposal will be considered by the Metering Expert Panel the following week, on 12 August. Subject to the Panel supporting progression, consultation is expected to open on 14 August 2026. Given the limited scope and corrective nature of the change, Change Panel previously approved a request to bypass a PIA. The proposal is targeting a final decision at the October Metering Expert Panel, with implementation planned for the November 2026 release to remove the incorrect obligations as quickly as possible. Attendees were encouraged to review the consultation and submit any comments during that consultation period, as there will be the only opportunity for stakeholder feedback.

8. R0332 - AMEND THE REC TO PERMIT RECCO TO UNDERTAKE ADDITIONAL CODE MANAGER ACTIVITIES

BA provided attendees with an overview of the Change Proposal. BA explained that R0332 is an urgent Change Proposal intended to enable RECCo to undertake activities associated with becoming the Code Manager for the proposed Electricity Commercial Code (ECC).

BA advised that, following Ofgem's Code Reform Phase 2 programme, RECCo submitted a contingent expression of interest to act as Code Manager for the ECC, which is expected to consolidate the Connection and Use of System Code (CUSC) and DCUSA. On 01 June 2026, Ofgem confirmed that RECCo would progress through the licensing assessment process on a non-competitive basis.

Currently RECCo's objectives and permitted activities are limited solely to the management and administration of the REC. This creates a legal restriction on RECCo undertaking work associated with other industry codes, including activities required to support the ECC licensing assessment or any future delivery arrangements. R0332 has therefore been raised to amend the REC to explicitly permit those activities.

The proposed solution introduces a framework for "additional code manager activities", separate from RECCo's existing REC-focused objectives. The REC Board would be given authority to apply for and deliver Code Manager roles for other energy codes, whether directly, through a subsidiary company, partnership, or other delivery arrangement. The proposal would also introduce a new obligation within the REC requiring the REC Board to give effect to authorised additional Code Manager activities. While the ECC is the immediate driver for the change, references to the ECC would largely be limited to a single clause and a defined term in Schedule 1, enabling the framework to accommodate future code management opportunities without requiring significant further REC amendments.

A key element of the proposal concerns funding arrangements. R0332 would allow expenditure on additional Code Manager activities but would place controls around how such activities are funded. Funding could only be drawn from contingency budgets or other budget provisions approved under existing REC governance arrangements. The proposal explicitly prevents the

diversion of funding away from approved REC workstreams unless those funds are no longer required for their original purpose. It also requires costs, liabilities, recoveries and reimbursements associated with additional Code Manager activities to be separately identifiable and managed transparently, with benefits flowing back to REC Parties where appropriate.

BA advised that the proposal is currently out for consultation, with responses due by 11 August 2026. Given the need to align with RECCo's deadline for submitting its ECC licensing assessment to Ofgem by 1 September 2026, the consultation period has been shortened to 10 working days rather than the standard 15. An accompanying FAQ document has also been published to support stakeholder review. BA added that following consultation closure, the proposal would be progressed for an ex-committee Decision during the week commencing 24 August 2026. This accelerated timetable is intended to ensure that Ofgem can consider both the final recommendation on R0332 and RECCo's ECC licensing assessment in parallel as part of its decision-making process.

9. I0318 – INTRODUCTION OF CONSUMER CONSENT SOLUTION

HT provided an update on the ongoing Consumer Consent Solution (CCS) project. They recapped the key points from the three latest CCS Topic Solution Group meetings held in July. The minutes for all three meetings summarised below are available on the REC Portal.

The 16 July meeting focused on user account creation within CCS, including the future approach to guest accounts and permanent user accounts. The meeting also covered how permissions (previously referred to as consents) would be renewed, alongside ongoing development of the Customer Experience Guidelines (CEGs). These guidelines are intended to establish a consistent approach for Authorised Third Parties (ATPs) when interacting with Consumers and using the CCS. Participants also reviewed token lifetimes and associated security controls governing ATP access to consumer data.

The 22 July meeting reviewed detailed aspects of the permission schema, including the structure of consent messages, associated Data Items, and how permission information would be shared between parties. Discussions also continued on identity verification processes, including how address mismatches and MPAN-related discrepancies would be managed within customer journeys.

The 29 July meeting covered a variety of technical topics. Participants received an update on the position regarding Bill Payer versus Occupier requirements and confirmed that the initial Minimum Marketable Product (MMP) will focus on the Occupier and access to Half-Hourly metering data. An update was also provided on identity verification arrangements, confirming that photo identification will no longer be mandatory, although it will remain available as an optional verification route. The meeting also explored OpenID Connect, its role within CCS architecture, and the Shared Signals Framework, which will be used to notify relevant parties when a permission is amended, expires or is revoked.

HT advised that the draft legal drafting consultation, originally expected to commence in mid-August, has been postponed until early September 2026. The consultation will still run for six

weeks. HT explained that the revised timetable reflects stakeholder feedback regarding the summer holiday period and also ensures alignment with the related Tariff Interoperability Consultation, which is scheduled for later in September.

HT reminded attendees that the initial CCS implementation is focused exclusively on Domestic Consumers and Half-Hourly metering data. However, the longer-term intention is that the service could be expanded to support wider use cases, including Non-Domestic Consumers. They encouraged further engagement with CCS from Non-Domestic Parties.

An attendee welcomed the update but highlighted the challenge faced by Non-Domestic Suppliers in trying to engage meaningfully at this stage. They noted that the programme remains heavily focused on Domestic market requirements, making it difficult for Non-Domestic organisations to justify dedicating significant resources to detailed discussions about a solution that may not affect them for some time. They suggested targeted sessions or briefing workshops specifically aimed at Non-Domestic Suppliers if expansion becomes a more immediate prospect. HT agreed and confirmed that this feedback would be fed into the project's engagement planning. They noted that if CCS is expanded into Non-Domestic markets in future, the use cases, requirements and customer journeys would need to be thoroughly assessed, with dedicated stakeholder engagement forming part of that development process.

Another attendee supported this view regarding future Non-Domestic engagement and sought clarification on how the initial domestic-only scope would be identified in practice. HT confirmed that the distinction would be based on the established domestic versus Non-Domestic premises classification and that ATPs would be responsible for ensuring they are using CCS appropriately when providing services. Data holders would similarly expect a valid CCS permission to be in place when sharing data within the defined domestic use cases.

HT advised that the CCS Topic Solution Group meetings will continue to take place on a fortnightly basis, with focus on a particular topic each meeting. HT advised that any interested Parties should contact consumerconsent@retailenergycode.co.uk or register their interest on the RECCo website. The next Topic Solution Group meeting is scheduled for 12 August and will focus on business process maps.

HT added that further information can be found on the Consumer Consent Hub on the REC Portal. The August Consumer Consent Digest was also published this week.

10. CODE MANAGER ISSUE TRACKER UPDATE

The Chair 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.

11. AOB

The Chair invited attendees to provide AOB.

CF advised that RECCO hosted a webinar on 29 July providing an update on the new REC Governance Framework and Stakeholder Advisory Forum that are coming in later this year as part of Ofgem's ongoing Code Reform programme. Any attendees who were unable to attend the webinar can access meeting materials here.

There were no further items raised, and the Chair closed the meeting.