RETAIL ENERGY CODE

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REC CHANGE ISSUES GROUP
MEETING MINUTES

MEETING	**RECCHIG_26_0903**
DATE	**03 September 2026, 10:00**
LOCATION	**By teleconference**

Presenter	Representing	Initials	Role
Lydia Bentley	REC Code Manager	LB	Chair
Caroline Freimuller	REC Code Manager	CF	Subject Matter Expert
Harriet Truss	REC Code Manager	HT	Subject Matter Expert
Lorna Mallon	REC Code Manager	LM	Subject Matter Expert
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 August 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. I0318 – INTRODUCTION OF CONSUMER CONSENT SOLUTION

HT provided an update on the ongoing Consumer Consent Solution (CCS) project. They advised that the CCS project team are finalising the REC Legal Drafting Consultation, which is due to be issued during w/c 07 September.

An attendee asked for clarification on plans to engage the Non-Domestic Supplier market, following discussion at the previous CHIG meeting. HT explained that there is currently no specific engagement plan in place or timeline agreed. However, feedback has been provided to the project engagement team, and it has been suggested that ICoSS (Industrial and Commercial Shippers and Suppliers Group) could be an effective forum for increasing awareness and obtaining input from stakeholders across the Non-Domestic sector. HT noted that the consultation is expected to remain open for six weeks, providing an opportunity for this engagement activity to take place during that period, although the next steps are still being determined.

5. R0321 - DNOS CREATE EXPORT MPANS AFTER APPROVING G98/99 COMMISSIONING DOCUMENTS

CF provided attendees with an overview of the Change Proposal. CF explained that R0321 seeks to remove Electricity Suppliers from the process of creating Export Meter Point Administration Numbers (MPANs) for new generation installations and instead require Distribution Network Operators (DNOs) to create Export MPANs directly when they approve G98 or G99 commissioning documentation.

CF advised that R0321 had been significantly amended following Party impact assessment feedback. R0321 was originally titled "DNOs Creating Export MPANs for Large New Housing Developments", but feedback indicated that both the title and proposed solution were too broad and lacked clarity. As a result, the Code Manager worked closely with DNO respondents to the Party impact assessment to refine the solution and address concerns, particularly around the potential safety risks of creating Export MPANs before generation equipment had been commissioned.

The revised solution introduces a more defined trigger point for creating Export MPANs. Rather than relying on a DNO's awareness that an Export MPAN may be required, the obligation would arise once the DNO approves specific Distribution Code documents, namely the G98 Engineering Recommendation Installation Document (Form B) or the equivalent G99 Forms A31 and A32. CF confirmed that discussions had taken place with the Distribution Code team, who were satisfied that the proposal would not impact their Code arrangements and that the documents were simply being used as a trigger point within the REC. Consultation respondents are being asked whether explicitly naming these documents within the REC is appropriate or whether an alternative drafting approach could achieve the same outcome.

CF advised that the consultation opened on 21 August and will close on 14 September. A specific consultation question has been included for DNOs to establish how frequently these approved installations never subsequently require an Export MPAN. The proposal is currently based on the assumption that such cases are relatively uncommon, as most Consumers installing generation equipment intend to obtain an Export tariff. However, if consultation responses demonstrate that a significant number of approved installations never require an Export MPAN, the solution may need to be reconsidered to avoid creating large numbers of unnecessary Export MPANs.

Following consultation closure, there will be a one-month review period to assess responses and determine whether the proposed solution remains appropriate for implementation. CF

encouraged all stakeholders, particularly DNOs, to respond to the consultation and raise any questions with the change team before submitting formal feedback.

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

HT provided attendees with an overview of the Issue on behalf of the lead analyst. HT 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. HT 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 .

HT provided a progress update on the ongoing review of REC Schedules, products and supporting documentation required to remove redundant provisions once MHHS transition is complete at the M15 milestone. This review includes 13 REC Schedules and four Category 2 Products, with the majority of amendments falling into three key areas: removal of references distinguishing MHHS and non-MHHS Metering Points, removal of redundant market participant roles (e.g., Data Collector and Data Aggregator) and associated processes, and removal of legacy only and transition-related obligations such as Migration and non-MHHS metering processes.

Work is also underway with REC Technical Services colleagues to assess consequential changes to the Market Message and Data Item Catalogues. In addition, a Service Provider impact assessment has been triggered to examine technical and documentation changes to the Electricity Enquiry Services (EES) portal and Application Programming Interfaces (APIs) resulting from the removal of redundant data items.

Several REC Schedules are now ready for stakeholder review and are available to view on the REC Portal, including Schedules 9, 12, 14, 23 and 28. The proposed amendments are largely housekeeping in nature and remove MHHS implementation, qualification and transition provisions that will no longer be required following full migration. Schedule 14 contains the most significant changes, including the removal of Part E, which currently contains the legacy non-MHHS electricity processes, together with updates to remove unnecessary MHHS and MHHS Metering Point references and align drafting introduced through R0207. Schedule 23 removes references to redundant market participant roles such as Half Hourly Data Collectors and Half Hourly Data Aggregators, while Schedule 28 updates related Metering Point provisions by consolidating wording previously split between MHHS and non-MHHS arrangements. HT also confirmed that Schedule 34, which relates to MHHS migration, will be removed in its entirety once transition is complete.

An attendee highlighted ongoing industry concerns regarding dispute processes in Schedule 30 (Section C) that had been raised at a recent REC Issues Group meeting. HT confirmed that this was being progressed separately from the current Issue and that a dedicated session would be arranged and communicated to REC parties through the usual channels.

Attendees were invited to review the draft schedules available on the Change Proposal page and provide feedback on the proposed amendments or any overlooked impacts. Further

updates on the remaining schedules, data specifications and EES impacts are expected at upcoming meetings. HT also invited attendees to share areas where additional detail would be helpful at future Change Issues Group meetings – no requests were made in the meeting

7. I0331 - REGULATORY ALLIANCE CREATION REJECTIONS

CF provided attendees with an overview of the Issue. CF advised that I0331 is examining delays in the submission of Regulatory Alliance creation requests to the Central Switching Service (CSS), or the working of rejections of Regulatory Alliance creation requests from the CSS . The issue was raised following an incident where rejected or unsent Regulatory Alliance requests resulted in more than 200 Consumers experiencing delays when Switching to their chosen Energy Supplier. The scope of the Issue is limited to the REC Schedule 24 process for submitting Regulatory Alliance Market Messages to the CSS and explicitly excludes activities governed by the Distribution, Connection and Use of System Agreement (DCUSA) or the Uniform Network Code (UNC). The Cross-Code Steering Group (CCSG) is monitoring the Issue to ensure there is no scope creep into other Code arrangements.

The proposed solution would introduce a two Working Day SLA for DNOs or Gas Transporters (GTs) to notify the relevant GRDA or ERDA (Gas/Electricity Retail Data Agent) when a new Regulatory Alliance has been created, a one-working-day SLA for the GRDA/ERDA to submit the Market Participant Role Regulatory Alliance Market Message to the CSS, and where a rejection is received from the CSS, a one-working-day SLA to investigate the rejection followed by a further one working day either to resubmit the message or notify the Energy Supplier if the Regulatory Alliance cannot be established. Where appropriate, Parties would also be required to raise a CSS support ticket.

An attendee questioned whether the proposed timescales appropriately reflected the wider Regulatory Alliance process and whether sufficient consideration had been given to the practical time required for Parties to complete the activities. CF clarified that the wider Regulatory Alliance establishment process sits outside REC governance and is therefore out of scope. They emphasised that the proposed SLAs are intended as initial recommendations and that Parties are encouraged to provide evidence through the Party impact assessment if alternative timescales would be more realistic.

Discussion also covered the CSS response times associated with Regulatory Alliance submissions. An attendee queried whether there should be a corresponding SLA on the CSS. CF explained that CSS processing already operates under existing Schedule 24 service standards, with acceptance or rejection responses returned almost immediately following validation. Once a message receives an acceptance response, no further rejection would occur, whereas rejected messages trigger the proposed new obligations. Parties would be able to identify the specific rejection reason from existing CSS response codes and determine whether the issue requires resubmission or escalation to CSS support.

CF confirmed that no new Performance Assurance requirements are currently proposed. Given the low frequency of incidents, the relatively limited Consumer impact, and the fact that only one known occurrence has been identified since CSS go-live, an incident-based assurance approach is considered proportionate. Under this approach, Performance Assurance would

investigate any future incidents directly, with the need for ongoing monitoring being reviewed if the frequency of occurrences increases.

The Party impact assessment opens on 08 September and will run until 25 September. Stakeholders are encouraged to provide feedback on the proposed SLAs, the overall solution design, and the decision not to introduce ongoing Performance Assurance monitoring. Following assessment of responses and completion of a business case assessment, the Code Manager will present an update and proposed next steps to the REC Change Panel by the end of October, including whether the issue should proceed to a full consultation stage.

8. R0336 - LEGAL TEXT TO SUPPORT REC CHANGE R0180

CF provided attendees with an overview of the Change Proposal. CF explained that R0336 has been raised to deliver the legal drafting required to support R0180 - Clarity on use of on hold for switching issues, including the obligations of CSS Users. R0180 is a previously approved technical change that introduces functionality allowing the CSS Service Desk to automatically close certain tickets where no response has been received from the responsible party after a defined period. The technical change was approved by the Technical Expert Panel in March 2026 and is scheduled for implementation in November 2026. R0336 ensures that the associated REC legal text aligns with this functionality by defining when ticket closure is permitted and which ticket categories remain exempt from automated closure.

The proposed legal text updates the Switching Service Management Schedule and the Switching Operator Service Definition. It permits the Switching Operator to automatically close specified Category 3 and Category 4 tickets where no response has been received within defined timescales, namely 15 Working Days for one category and 25 Working Days for the other. The drafting also establishes the reminder process the Switching Operator must follow before closure, including notifying parties that a ticket will be automatically closed if no response is received.

R0336 also clearly defines the ticket types that remain out of scope for automated closure. Tickets relating to CSS certificates, operational switching service changes, switching problems, data fixes, and parent-child ticket structures must remain open until a response is received and therefore cannot be closed automatically.

CF emphasised that R0336 is expected to have minimal impact on Parties as it merely codifies and supports technical functionality that has already progressed through assessment and approval. R0336 is currently out for consultation, with responses due by 14 September. As the legal text must be implemented alongside the underlying technical solution in November 2026, the intention is to seek approval from the Technical Expert Panel in September, although October remains a fallback option if required.

Attendees were encouraged to submit any comments on the legal drafting through the consultation process and emphasised as this Change Proposal was proceeding straight to consultation this would be the only opportunity to provide comments. CF asked Parties to advise in advance if they required an extension to receive a response, so the Code Manager is aware and does not issue the Change Report (Final Recommendation) assuming no further responses are incoming. CF also noted that associated Category 3 documentation, including

Switching Operator user guides, is currently being drafted and will be shared with industry once available.

9. CODE MANAGER ISSUE TRACKER UPDATE

The full list of updates is available to view on the meeting slides on the REC Portal.

10. AOB

The Chair invited attendees to provide AOB.

R0322 – ERRONEOUS SWITCH REVIEW I0237 CLARIFICATIONS

LM provided an update on the proposed solution for R0322 which is expected to be consulted on later in September. The proposal focuses on improving clarity within the Erroneous Switch (ES) process and associated Data Items, rather than introducing system changes. Suppliers have already completed impact assessments on the original proposals, with the changes intended to provide clearer documentation, support training activities and ensure consistent interpretation of requirements.

LM highlighted a key amendment relates to clarification of the Erroneous Switch Flag. Previous documentation indicated that the enumeration values were “T” and “F”; however, this has since been confirmed as incorrect. The correct values are “true” and “false” in lowercase, with a field length of five characters. While parties are already using the Data Item correctly, the change aims to ensure that published documentation accurately reflects the required values and provides clarity for new market entrants or organisations updating their systems.

LM also highlighted proposed terminology changes within the ES process. Previous drafting had moved references from “current” and “original” Supplier to “new” and “old” Supplier. Following further review, the preferred approach is now to align terminology with industry practice by using “Gaining” and “Losing” Supplier across both relevant flows. Consultation questions will seek stakeholder views on this approach.

Due to the additional review work and amendments identified since the original impact assessment, R0322 has missed its initial release window and is currently targeting a February 2027 implementation date. Stakeholders will be asked to comment on the proposed implementation timing as part of the consultation.

LM emphasised that the forthcoming consultation will contain more changes than were included in the original Supplier impact assessment and encouraged Suppliers to review the consultation carefully when it is published.

PRIORITY SERVICE REGISTER PROCESS

LM provided an update on forthcoming guidance that will be published through a REC article, expected during w/c 07 September. The update concerns situations where Domestic Consumers are billed through an intermediary, such as housing associations, bundled utility service providers or third-party billing arrangements. The intention is to remind Suppliers that where Priority Services Register (PSR) data is shared, the information provided should relate to the actual Consumer or site contact details rather than the billing contact details.

The issue has been identified because, in some cases, outage notifications are being sent to the billing contact rather than the Domestic Consumer whose supply is affected. This creates a risk that Vulnerable Consumers may not receive important communications about planned or unplanned power interruptions. To address this, the Code Manager intends to raise a REC issue to review Schedule 13 and ensure the requirements are sufficiently clear.

LM explained that the immediate focus is on circumstances where a property is clearly domestic and supplied under a domestic arrangement, but where PSR-related data is being shared using incorrect contact details. Looking further ahead, the proposed issue may also consider more complex scenarios involving domestic properties supplied through non-domestic contracts, although this would require wider discussion and consideration of existing licensing and regulatory constraints.

An attendee noted that identifying Domestic properties supplied under non-domestic contracts has long been an industry challenge and questioned how such situations could practically be addressed. LM agreed that this remains a complex issue and acknowledged that broader regulatory matters would need to be resolved before REC provisions could fully address it. They reiterated that the immediate objective is to clarify the existing process and strengthen the wording within Schedule 13, while recognising that any wider solution would require further industry discussion through the proposed REC issue.

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