RETAIL ENERGY CODE

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REC CHANGE PANEL MEETING
MEETING MINUTES

MEETING	**RECCP_24_1015**
DATE	**15 October 2024, 13:00**
LOCATION	**By teleconference**

Attendee	Representing	Initials	Role
Joy Nnamani	Retail Energy Code Company	JN	Alternate Chair
Ben Atkinson	Domestic Suppliers	BA	Committee Member
Dan Tarasco-Fittock	Non-Domestic Suppliers	DTF	Committee Member
Andy Clasper	Gas Networks	AC	Committee Member
Alex Travell	Electricity Networks	AT	Committee Member
Dave Wright	MEMs	DW	Committee Member
Paul Gath	Independent SME	PG	Committee Member
Sebastian Eyre	Independent SME	SE	Committee Member
Lynne Fallon	Independent SME	LF	Committee Member
Jonathan Coe	Ofgem	JC	Committee Member
Cristina Ullastre	Ofgem	CU	Alternate Member
Jon Dixon	Retail Energy Code	JD	Subject Matter Expert
Glenn Sheern	Code Manager	GS	Subject Matter Expert
Holly Law	Code Manager	HL	Change Analyst
Harriet Truss	Code Manager	HT	Change Analyst
James Hardy	Code Manager	JH	Change Analyst
Caroline Freimuller	Code Manager	CF	Change Analyst
Caroline Milner	Code Manager	CM	Technical Analyst
Florentina Monea	Code Manager	FM	Observer
Rachael Jones	Code Manager	RJ	Observer
Bradley Mercer	Code Manager	BM	Secretary

1 INTRODUCTIONS

The Chair welcomed attendees to the meeting of the REC Change Panel (RECCP). BM advised that apologies had been received from Lindsay Biginton (Committee Chair) and Lydia Bentley (Code Manager).

2 CONFIRMATION OF AGENDA

The Chair invited any additional items of business for consideration during the meeting; one additional item of business was raised. BM advised that there were currently no open actions on the Actions Log.

3 APPROVAL OF THE PREVIOUS MINUTES

The Chair invited Members to provide comments on the draft minutes of the meeting held on 01 October 2024. BM advised that a comment on the attendees list had been received prior to the meeting, RECCP Members were comfortable with the amendment to the attendees list and approved the minutes as an accurate reflection of the meeting subject to attendees list update.

4 R0182 – PML LEVELISATION CHANGE

HT provided Members with an overview of the Authority Determined Final Recommendation Change Report for R0182.

HT informed Members that R0182 is seeking to introduce the necessary amendments to existing Payment Method Levelisation (PML) Reconciliation arrangements, which had been introduced through R0147 to allow for multi-register reconciliation.

HT advised that the amendments would allow for an ongoing reconciliation that accounts for a split in both single-rate and multi-register Electricity Metering Assets. HT added that the change would allow for a one-off retrospective recalculation for the period dating from the proposed effective implementation date of 01 January 2025 back to the implementation of the original reconciliation mechanism on 01 April 2024.

HT provided an overview of the two consultation responses which had been submitted advising that both were in favour of the change. HT informed Members that the Code Manager had suggested the removal of paragraph 11.8 from the report which had been supported by respondents. HT advised that 11.8 was inconsistent with the rest of the Code. HT advised that typographical errors had been called out in the responses which had been corrected in the Final Recommendation Change Report presented to Members at the meeting.

HT advised that one of the respondents had challenged the obligation to provide data to RECCo for the new retrospective recalculation advising that Suppliers were already required to submit the same data to Ofgem on a monthly basis through their Request for Information. HT advised that they challenged the need to provide the data directly to RECCo as well as to Ofgem. HT

advised that the comment had been discussed by Ofgem and RECCo and it had been agreed that there would be a new data sharing approach that was not included in the original solution.

HT highlighted that the new approach would allow Ofgem to share the data with RECCo if given permission by the Supplier specifically for that purpose. HT confirmed that this process had been added in to the legal text and the Code Manager had made the decision that the updated legal text did not require consultation due to the optionality of the data sharing. RECCP Members did not raise any comments or challenges.

HT informed Members that the Code Manager recommendation is for a recommendation to the Authority of approval of R0182 for implementation on 08 November 2024. HT added that, to achieve a 08 November 2024 implementation date, a quick turnaround would be required by the Authority for their decision. HT added that if the Authority could not come to a quick decision by 01 November 2024, R0182 would be implemented no later than 31 December 2024.

The Chair informed Members that they would be voting on a recommendation to the Authority for R0182. RECCP Members noted the contents of the change and:

- **AGREED** unanimously to recommend approval of proposed change solution to the Authority.
- **AGREED** unanimously to recommend approval of the proposed implementation approach to the Authority.
- **AGREED** unanimously to recommend approval of the proposed implementation date '08 November 2024, subject to Authority Decision by 01 November 2024, or no later than 31 December 2024' to the Authority.

5 R0203 – CSS RETRY STAREGY

As the Lead Analyst for R0203, JH provided an overview of the Final Recommendation Change Report.

JH informed Members that R0203 was seeking to amend the legal text in section 2.4 of the Switching Data Management Schedule to reflect the retry strategy which is currently in the Central Switching Service (CSS) system.

JH summarised advising that 18 months ago the CSS retry strategy had been updated but the Data Communications Company (DCC) were unaware that they had to follow the formal change route to make the update, and this was a straightforward legal text change to match the current ways of working. JH confirmed that the DCC were now fully aware of the change process.

JH informed Members that the two consultation responses had been received which were both supportive of the change and implementation date. JH advised that one of the respondents suggested alternative wording which the Code Manager had rejected as the current wording had been agreed with the Lawyers and the DCC. There were no comments or questions from Members.

JH confirmed that the Code Manager recommendation was that R0203 was approved for implementation on 08 November 2024.

The Chair informed Members that they would be voting to approve or reject the Code Managers recommendation. RECCP Members noted the contents of the R0203 and:

- **AGREED** unanimously to approve the change solution.
- **AGREED** unanimously to approve the implementation approach for R0203
- **AGREED** unanimously for implementation date of 08 November 2025.

6 R0206 - CROSS CODE CHANGE TO ALIGN WITH BSC CP1598

As the Lead Analyst for R0206, CF provided Members with an overview of the Final Recommendation Change Report.

CF informed Members that R0206 had been raised been raised to align with BSC CP1598. CF advised that change was looking to add six scenario variants across four market messages that had been specified within the early drafting of P375 were not progressed to the final solution of P375 and R0008.

CF advised that this change would have usually been presented to REC Technical Expert Panel (RECTEP) for decision, however, due to the BSC change the REC change had to be turned around in a short timescale the Code Manager had selected the RECCP as the Responsible Committee to ensure that approval was received and the Appeal Window was closed ahead of 08 November 2024 to align with the BSC change.

The Chair asked if there had been an opportunity to present the change to the RECTEP ex-committee either with a meeting or a decision via the Portal. CF advised that this had been considered as an option however, as there was a scheduled RECCP meeting in time and it was the primary committee for change the Code Manager preferred the RECCP route.

CF informed Members that there had not been a Service Provider or Party Impact Assessment (IA) carried out on R0206 as there had been an IA carried out under the BSC. CF confirmed that the BSC had received one IA response which was in support of the change. CF informed Members that the Code Manager had received one consultation response which was in support of the solution and implementation date.

CF confirmed that the Code Manager recommendation was that R0206 was approved for implementation on 08 November 2024.

- **AGREED** unanimously to approve the change solution.
- **AGREED** unanimously to approve the implementation approach for R0206
- **AGREED** unanimously for implementation date of 08 November 2025.

7 R0137/A – INTRODUCING TPI ASSURANCE AND ACCREDITATION

As the Lead Analyst for R0137/A, CF provided Members with an overview of the Consultation Change Report.

CF advised that R0137/A was proposing that Energy Suppliers could only use accredited Third-Party Intermediaries (TPIs) who adhere to the principles in the REC TPI Code of Practice in their interactions with Non-Domestic Consumers.

CF provided Members with an overview of the 20 IA responses advising that there was an unprecedented amount of IA responses and a large amount of interest in this change from industry. DTF advised that it was good to see this amount of engagement from industry in the change process.

CF provided a summary of the key themes from the IA responses advising that there had been a lot of general support for regulation in the TPI market. However, there was a preference for direct regulation from a central body as opposed to regulation via Suppliers. CF advised that this fell outside the scope of the REC.

CF advised that some respondents highlighted that multiple routes to accreditation may lead to more unscrupulous TPIs choosing the easiest route of accreditation to operate in the market and had suggested that a single route of accreditation would resolve this potential issue. CF advised that following this feedback the Code Manager had proposed R0137/A which proposed that the REC Service Accreditation Scheme run by RECCo would be the single route to accreditation.

CF informed Members that following the close of the IA period the Code Manager had received a letter in response to the R0137/A Change Report (For Consultation) from a TPI Trade Association. CF advised that the letter expressed opposition to R0137/A highlighting that they believed that a single route of accreditation was anti-competitive. CF confirmed that the letter would be shared with RECCP Members with the post meeting papers as well as being sent to Ofgem.

CF informed Members that the Code Manager's minded to position was to recommend approval of R0137/A to the Authority and recommend rejection of R0137 to the Authority, and that this would be reviewed post consultation closure.

CF confirmed that the Code Manager was aware of the Department for Energy Security and Net Zero (DESNEZ) consultation on TPI regulation which was scheduled to close at the end of November 2024. CF advised that the Code Manager had received instruction from RECCo and Ofgem to continue progressing the change through the process.

DTF advised that he did not believe that a single route of accreditation was anti-competitive and highlighted that it was commonplace across the industry citing the Gas Safe Register as an example.

DTF highlighted that he believed that the change could progress to consultation however, urged RECCo and the Code Manager to consider the IA responses around direct regulation and the DESNZ work. DTF advised that the outcome of the DESNZ regulation could undo regulation under the REC and the work done by the Code Manager and RECCo. DTF suggested that following the consultation on R0137/A was placed on hold to understand the timelines of the DESNZ work.

JD advised that RECCo had a meeting scheduled with DESNZ and was hoping to gain a better understanding of the timescales associated with the DESNZ work. JD advised that he had been

working on the assumption that the work would take two to three years to complete. JD advised that R0137/A could serve as temporary regulation until the DESNZ direct regulation came into effect.

The Chair advised Members that they would be voting to determine whether R0137/A contained sufficient information and detail to progress to consultation. RECCP Members noted the contents of R0137/A and:

- **AGREED** unanimously that R0137/A contained sufficient information and detail to progress consultation.

8 R0207 - IMPORT AND EXPORT MOA CHARGING CLARIFICATION

As the Lead Analyst for R0207, CF provided Members with an overview of the Proposal Plan Change Report.

CF informed Members that BSC Mod 459 and REC CP R0144 had been raised to allow different Meter Operator Agent (MOAs) to be appointed for the import and export MPANs on a shared meter. CF advised that one of the justifications for this was to stop export suppliers being charged potentially uncompetitive rates. Both changes have been placed on hold due to the Market Wide Half-Hourly Settlement (MHHS) Programme, so this change has been raised to specifically resolve the charging issue.

CF advised that traditionally the Codes did not get involved in charging or contracts between parties, so the Code Manager had requested advice from Legal counsel and Ofgem on the solution. CF highlighted that the responses had suggested following the Authority Consent change path. CF provided Members with an overview of the milestones within the Proposal Plan:

Milestone	Activity	From	To
Definition		**29-Aug-24**	**15-Nov-24**
	Code Manager Assessment	August	October
	Impact Assessment	October	November
	Business Case Assessment	November	November

CF advised that the Proposal Plan was limited at this stage to understand the appetite to the change from Suppliers and the scope of the issue. CF advised that following Business Case Assessment the Code Manager would present a re-plan of the Proposal Plan to RECCP Members.

CF informed Members that the Code Manager was proposing that the REC Metering Expert Panel would be the Responsible Committee for the change. The Chair advised Members that they would be voting to approve or reject the Proposal Plan. RECCP noted the contents of the Proposal Plan and:

- **AGREED** unanimously to approve the Proposal Plan for R0207 – Import and Export MOA Charging Clarification.

9 R0211 - NOVEMBER 2024 HOUSE KEEPING CHANGE

As the Lead Analyst for R0211, CF provided Members with an overview of the Housekeeping Change Report.

CF informed Members that R0211 was looking to improve clarity on the Smart Meter Installer Domestic, and Micro Business Consumer survey templates, which was discussed at the September 2024 REC Change Issues Group meeting. CF advised that R0211 would also be adding additional information on error messages within the Supply Point Switching API Technical Specification.

RECCP Members were informed that they would be voting to approve or reject the Housekeeping changes for implementation on 08 November 2024. RECCP Members noted the contents of R0211 and:

- **AGREED** unanimously to approve the proposed change solution.
- **AGREED** unanimously to the apposed implementation approach.
- **AGREED** unanimously the proposed implementation of 08 November.

10 RE-PLAN OF R0201 - ERDS CSS DISCREPANCIES

HT provided Members with an overview of the re-plan of R0201. HT informed Members that the change was seeking to create a new tool to replicate the current manual correction of data discrepancies in the Electricity Retail Data Service (ERDS) and Central Switching Service (CSS) systems, post MHHS implementation.

HT advised that the original Proposal Plan had been set on the expectation that the associated BSC change would have been raised in September. HT advised that the BSC change has been delayed. It had previously been identified that the two changes need to have aligned change plans and therefore the delay from the BSC means the R0201 Proposal Plan needs to be amended. HT highlighted that the expected push back of the MHHS implementation date has removed the urgency of the change and therefore pushing the dates back in the R0201 plan does not create additional risk. HT provided Members with an overview of the new milestones within the updated Proposal Plan:

Milestone	Activity	From	To	From	To
Definition		**01-Aug-24**	**31-Oct-24**	**01-Aug-24**	**31-Dec-24**
	Solution Development	August	August	Complete	Complete
	Impact Assessment	September	October	November	November
	Solution Refinement	October	October	December	December
Change Proposal		**25-Oct-24**	**25-Oct-24**	**13-Jan-25**	**13-Jan-25**
	Business Case Assessment	October	October	January	January
	Update Responsible Committee	November	November	January	January
	Consultation	November	November	January	February
	Final Determination	November	December	February	February
Voting		**17-Dec-24**	**17-Dec-24**	**04-Mar-2025**	**04-Mar-2025**

The Chair advised RECCP Members that they would be voting to approve or reject the updated milestones within the Proposal Plan for R0201. RECCP Members noted the contents of the paper and:

- **AGREED** unanimously approved the updated milestones within the proposed plan.

11 UPDATE ON R0155 – CHANGE OF OCCUPIER: EVIDENTIARY STANDARDS AND TIMESCALES

JH provided Members with an update on the progression of R0155 through the change process, advising that the change had been renamed to *Change of Occupier: Evidentiary Standards and Timescales* to align with the correct legal terminology.

JH informed Members that the Party IA had closed on 27 September 2024 and the Code Manager received 18 responses from a range of Energy Suppliers, TPIs, Trade Associations and Consumer Representative groups. JH advised that there was broad support for the legal text including the non-exhaustive list, and the introduction of a new Non-Domestic Change of Occupier Schedule. JH added that Energy Suppliers noted their troubles with the use of Secure Data Exchange Portal (SDEP), but understood SDEP (as the REC's secure method of sharing data) is likely to be used in the interim solution, with no alternative suggestions being provided. JH added that many of the respondents raised concerns around the Performance Assurance requirements, stating they believe the requirements to be unproportionate to the change.

JH confirmed that REC Professional Services were currently engaging further with REC Legal advisors, and the Performance Assurance team, to review and respond to any suggested changes. JH advised that once this had been completed, the Code Manager would share the Consolidated IA Responses with RECCP Members.

JH provided an overview of the next steps of the change highlighting that the Code Manager intended to present the Change Report (for Consultation), with an updated Change Proposal Plan, at the next REC Change Panel meeting on 05 November 2024. If approved, the Code Manager intended to issue a three week consultation on 06 November 2024, closing on 27 November 2024. JH confirmed that the Code Manager still expected the Final Recommendation to be brought to the RECCP, and submitted to the Authority, before the end of 2024.

12 CHANGE PROPOSAL TRACKER

12.1 R0209 – IMPLEMENTATION OF MHHS ARRANGEMEMNTS

HT informed Members that the R0209 consultation had closed on 09 October 2024 and seven responses had been received all of which were supportive of the change and solution. HT highlighted that some comments had been raised which required review and discussion ahead of determining if updates should be made to the legal text.

13 AOB

13.1 2025 MEETING INVITES

BM informed Members that the calendar invites for the 2025 RECCP meetings would be sent to Members before the end of the week.