RETAIL ENERGY CODE

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

REC CHANGE PANEL MEETING
MEETING MINUTES

MEETING	**RECCP_24_1217**
DATE	**17 December 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
Bryan Heap	Electricity Networks	BH	Alternate Member
Andy Clasper	Gas Networks	AC	Committee Member
Dave Wright	MEMs	DW	Committee Member
Sarah Jones	Independent SME	SJ	Alternate Member
Sebastian Eyre	Independent SME	SE	Committee Member
Lynne Fallon	Independent SME	LF	Committee Member
Faye Brookes	Consumers	FB	Committee Member
Cristina Ullastre	Ofgem	CU	Committee Member
Lorna Mallon	Code Manager	LM	Subject Matter Expert
Glenn Sheern	Code Manager	GS	Subject Matter Expert
Paul Witton-Dauris	Code Manager	PWD	Head of Change
Holly Law	Code Manager	HL	Change Analyst
Luke Coyle	Code Manager	LC	Change Analyst
Lydia Bentley	Code Manager	LB	Change Analyst
James Hardy	Code Manager	JH	Change Analyst
Bradley Mercer	Code Manager	BM	Secretariat

1 INTRODUCTIONS

The Chair welcomed attendees to the meeting of the REC Change Panel (RECCP). BM advised that apologies had been received from Paul Gath (Committee Member) and that Sarah Jones was attending as his alternate. BM advised that apologies had been received from Alex Travell (Committee Member) and that Bryan Heap would be attending as his alternate.

2 CONFIRMATION OF AGENDA

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

3 APPROVAL OF PREVIOUS MINUTES

RECCP Members unanimously approved the draft minutes of the previous meeting held on 03 December 2024. The approved minutes will be published as 'final' and made available via the Portal no later than 18 December 2024.

4 R0155 – CHANGE OF OCCUPIER: EVIDENTIARY STANDARDS AND TIMESCALES

JH provided Members with an overview of the Authority Determined Final Recommendation Change Report for R0155.

JH informed Members that R0155 was seeking to address industry concerns with the Non-Domestic Change of Occupier (CoO) process identified by Non-Domestic Suppliers, Third Party Intermediaries (TPIs) and Consumers and bring improvements to the CoO Process.

JH advised that R0155 was proposing the introduction of a non-exhaustive list of evidentiary documents, and a 10 Working Day SLA for Energy Suppliers to review documentation and communicate the outcome to the Consumer (or TPI).

JH highlighted that at consultation, 20 responses were received from eight Energy Suppliers, two Trade Associations/Bodies, one TPI and Citizens Advice. Eight further responses were submitted confidentially.

JH provided Members with an overview of the solution (Slides 4-8) focusing on the background and timeline of activities, the newly drafted Non-Domestic CoO Schedule, Use of SDEP, Performance Assurance Requirements, and Guidance documents.

JH advised that a comment had been received against the Change Report via the Portal from a TPI. JH confirmed that the comment was asking a question around the purpose of the Guidance Document highlighting that the guidance was subject to how Energy Suppliers would treat individual scenarios. JH confirmed that the Code Manager would discuss the comment with the raising organisation ex-committee. JH advised that the comment also questioned the legal standing of some of the wording listed within TR1 and confirmed that the REC legal counsel had reviewed the Guidance Document, and that the Code Manager was comfortable with the wording.

JH confirmed that the Code Manager recommended that RECCP Members recommend approval of R0155 to the Authority for implementation on 27 June 2025.

DTF thanked JH for providing a narrative of the change and the solution and advised that he would not be in a position to accept the change. DTF advised that he could understand the

intent of the change. DTF stated his view was that the entirety of the consultation response document containing feedback from Energy Suppliers, Consumer Groups, and TPIs advised that the solution would not work for them. DTF advised that as a constituency representative he needed to take into consideration the views posed through the consultation responses.

DTF advised that his main concern with the change was the interim SDEP solution. DTF advised that this was a good example of why change freezes were not workable and that Ofgem needed to consider that change freezes caused parties to push back on other changes even when it was not likely that the solution for R0155 would have any meaningful impact on the Market Wide Half Hourly Settlement (MHHS) Programme. DTF believed that if the change freeze were not in place and the small change to SDEP could be made, there may be a different set of consultation responses.

DTF argued that his organisation had put forward a view that the implementation date should be pushed back until the code change freeze was lifted. DTF stated that Ofgem were worried about the consumer detriment of the CoO process which had been going on for a number of years, adding that there had not been any regulation in this area and questioned what the rush was to implement the change.

DTF said that he supported the stripping back of the Performance Assurance metrics, although questioned why Energy Suppliers would need to provide an explanation to REC as to how they have complied with the change. DTF added that this was not something that had ever been asked of Energy Suppliers in the past and could not understand where that had come from. DTF advised that Energy Suppliers were required to comply with REC governance through the Supplier License. DTF stated that the requirements of CoOs to take place were listed within the Electricity Act and that if Energy Suppliers did not comply with the process in R0155 they would be in breach of an Act so this was beyond the viries of the REC.

DTF stated that he did not believe that the change should be voted on at the meeting, highlighting that due to the closed nature of the R0155 Working Group this was the first time several parties had been able to provide their views on the solution and a number of issues had been raised. DTF believed that the Working Group should be reopened to resolve some of the issues raised in the consultation responses.

BA advised that he would be in a position to accept the change but noted that he supported DTF's points and highlighted that the SDEP was not fit for purpose in its current state to be used for the communication element of the solution. BA advised that Energy Suppliers have large numbers of issues with SDEP and highlighted that documents would likely go missing, causing problems for parties engaging with the CoO process.

SE advised that he believed that the process had been really thorough and stated that the proposed solution was workable for industry and was better than the current baseline. SE noted that none of the consultation responses had suggested that the process was not thorough enough.

LF challenged DTF's comments on his view that entire consultation response document was full of negative comments from Energy Suppliers, Consumer groups and TPIs. LF stated that

this was not the case and that there were a number of parties who provided positive feedback on the proposed solution.

JH thanked RECCP Members for their involvement in the process, particularly in the role as a critical friend. JH agreed with LF's statement and noted that there was a large level of support, particularly from Citizens Advice, within the consultation response document.

JH noted that there had been a large amount of engagement with parties. JH confirmed that all of the Impact Assessment responses and consultation responses would be passed across to the Authority to support them with their decision.

RECCP Members noted the contents of the Change Report and:

- **AGREED** to approve the proposed change solution.
- **AGREED** to approve the proposed implementation approach.
- **AGREED** to approve the proposed implementation date of 27 June 2025.

5 I0198 – GAS MEMS MOVE TOWARDS A SINGLE INTERFACE FOR KEY MARKET MESSAGES

As the Lead Analyst for I0198, LB provided Members with an overview of the Issue.

LB informed Members that studies conducted by the REC Performance Assurance (RPA) function of the REC Code Manager have concluded that gas market data fidelity may be improved by reducing the frequency of missed messages between Metering Asset Managers and other REC Parties. LB advised that I0198 was seeking to explore mechanisms by which a reduction in the number of permissible communication methods used by Meter Asser Managers (MAMs) could support the data quality improvement objective. LB provided Members with an overview of the milestones within the Proposal Plan:

Milestone	Activity	From	To
Definition		**17-Dec-24**	**31-Mar-25**
	Solution Development	December	March
	Legal Review	March	March
	Impact Assessment	March	March
	Solution Refinement	March	March

LB advised that there had been some confusion around the scope of the change due to the wording of the change documents. LB advised that from the current wording parties had interpreted the change as a push to remove the number of permissible communications for MEMs from three to one and this was not the case. LB advised that the scope of the change was limited to an interim solution and the Code Manager would be proposing to amend the wording and title of the change to clear up the scope following the decision by RECCP Members.

DW advised that he had a concern around how the change may impact AMIs advising that some AMIs could be MAMs and there was a potential that obligations could be inadvertently

placed on them. LB thanked DW for the feedback and advised that AMIs would be considered throughout solution development.

DTF asked if there were any anticipated cross code impacts of the change. LB advised that at this stage the Code Manager did not believe there would be. LM confirmed that the Cross Code Steering Group (CCSG) had been discussing the change and would continue to monitor its progress.

RECCP Members noted the contents of the Change Report and:

- **AGREED** unanimously to approve the Proposal Plan for I0198.
- **APPROVE** a wording amendment to the Change Report.

6 I0214 - MULTIPLE SWITCH REQUESTS INCREASING OBJECTION RATE

As the Lead Analyst for I0198, LB provided Members with an overview of the Issue.

LB informed Members that Non-Domestic Suppliers, when in receipt of a valid contract from a prospective Consumer, may attempt to register for their supply in an automated manner. If the existing Supplier objects, this may trigger communications to the Consumer, and prompts the prospective Supplier to attempt again, causing a feedback loop of Registration attempts. LB confirmed that this Issue was seeking to address this problem. LB provided Members with an overview of the milestones within the Proposal Plan:

Milestone	Activity	From	To
Definition		**17-Dec-24**	**31-Mar-25**
	Solution Development	December	March
	Legal Review	March	March
	Impact Assessment	March	March
	Solution Refinement	March	March

DTF advised that he had not come across the issue before on the Non-Domestic side and asked that the consumer impact formed the majority of the solution development rather than what makes Performance Assurance easier to manage. 7

RECCP Members noted the contents of the Change Report and:

- **AGREED** unanimously to approve the Proposal Plan for I0214.

7 I0215 - SCHEDULE 30 SWITCH METER READING PROBLEMS - REJECTIONS AND TIMINGS

As the Lead Analyst for I0215, LB provided Members with an overview of the Issue.

LB advised that it had been reported that REC Parties may employ practices relating to the D0300 Market Message where the Code has not caught up, both in terms of Performance Assurance and regulatory oversight. LB informed Members that this Issue was seeking to explore Supplier D0300 practices to determine if Code changes are needed to improve

robustness around the Disputed or Missing Switch Meter Reading processes. LB provided Members with an overview of the milestones within the Proposal Plan:

Milestone	Activity	From	To
Definition		**17-Dec-24**	**31-Mar-25**
	Solution Development	December	March
	Legal Review	March	March
	Impact Assessment	March	March
	Solution Refinement	March	March

RECCP Members noted the contents of the Change Report and:

- **AGREED** unanimously to approve the Proposal Plan for I0215.

8 UPDATE TO PROPOSAL PLAN - R0207 - IMPORT AND EXPORT MOA CHARGING CLARIFICATION

JH informed Members that in October 2024, the Code Manager submitted a Change Plan to the Change Panel for R0207, with the definition stage running from 29 August 2024 to 15 November 2024. JH advised that this was to allow the Code Manager to evaluate whether there was a business case for this Change.

JH advised that responses received from the party Impact Assessment period indicate that this issue was present across a number of Energy Suppliers and that parties expected to see an increase in the frequency of the issue due to the implementation of MHHS. JH confirmed that as such the Code Manager believed there was a business case to progress the change further. JH provided an overview of the updated 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
Change Proposal		**16-Nov-24**	**11-Mar-25**
	Solution Refinement	November	January
	Consultation	January	February
	Final Determination	February	March
Voting		**12-Mar-25**	**12-Mar-25**
	Issued for Authority Determination	13-Mar-25	13-Mar-25

RECCP Members noted the update to the Proposal Plan and:

- **AGREED** unanimously to approve the updated milestones within the Proposal Plan for R0207.

9 RECCP IMPROVEMENTS

BM advised that during October 2024 the Code Manager and RECCP Chair had met with REC Party Members to gather feedback on the management and operation of the RECCP. BM advised that good feedback was provided by Members particularly on the running of the meetings, the quality of papers and minutes, and the cadence of meetings.

BM advised that from the feedback the Code Manager had identified a number of improvements to the management of RECCP meetings:

- Increased use of RECCP Members as a critical friend for solution development.
- Provide Members with a project view of changes progressing under the REC through sub-committees and work groups.
- Organise a Committee Member Strategy Day.

BM advised that the Code Manager would be making these changes and organising the event in the new year.

10 CHANGE PROPOSAL TRACKER

There were no updates on existing changes provided by the Code Manager or requested by attendees.

11 AOB

11.1 RECCO ANNUAL SURVEY

The Chair advised that the RECCo Annual Survey was now live and encouraged Members to complete it on behalf of their organisations.

RETAIL ENERGY CODE

ANNEX A – VOTING TABLES

Do you agree with the Code Managers recommendation to recommend approval of the proposed change solution to the Authority?

Attendee	Representing	Vote
Ben Atkinson	Domestic Suppliers	Approve
Dan Tarasco-Fittock	Non-Domestic Suppliers	Reject
Bryan Heap	Electricity Networks	Approve
Andy Clasper	Gas Networks	Approve
Dave Wright	MEMs	Approve
Sarah Jones	Independent SME	Approve
Sebastian Eyre	Independent SME	Approve
Lynne Fallon	Independent SME	Approve
Faye Brookes	Consumers	Approve

Do you agree with the Code Managers recommendation to recommend approval of the proposed implementation approach to the Authority?

Attendee	Representing	Vote
Ben Atkinson	Domestic Suppliers	Approve
Dan Tarasco-Fittock	Non-Domestic Suppliers	Reject
Bryan Heap	Electricity Networks	Approve
Andy Clasper	Gas Networks	Approve
Dave Wright	MEMs	Approve
Sarah Jones	Independent SME	Approve
Sebastian Eyre	Independent SME	Approve
Lynne Fallon	Independent SME	Approve
Faye Brookes	Consumers	Approve

Do you agree with the Code Managers recommendation to recommend approval of the proposed implementation date of 27 June 2025 to the Authority?

Attendee	Representing	Vote
Ben Atkinson	Domestic Suppliers	Approve
Dan Tarasco-Fittock	Non-Domestic Suppliers	Reject
Bryan Heap	Electricity Networks	Approve
Andy Clasper	Gas Networks	Approve
Dave Wright	MEMs	Approve
Sarah Jones	Independent SME	Approve
Sebastian Eyre	Independent SME	Approve
Lynne Fallon	Independent SME	Approve
Faye Brookes	Consumers	Approve