RETAIL ENERGY CODE

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REC CHANGE PANEL MEETING
MEETING MINUTES

MEETING	**RECCP_25_0715**
DATE	**15 July 2025, 13:00**
LOCATION	**By teleconference**

Attendee	Representing	Initials	Role
Lindsay Biginton	Retail Energy Code Company	LB	Chair
Ben Atkinson	Domestic Suppliers	BA	Committee Member
Harry Hailwood	Non-Domestic Suppliers	HH	Committee Member
Sebastian Eyre	Independent SME	SE	Committee Member
Keith Foster	Independent SME	KF	Committee Member
Paul Gath	Independent SME	PG	Committee Member
Faye Brookes-Lewis	Consumers	FBL	Committee Member
Cristina Ullastre	Ofgem	CU	Committee Member
Jenny Boothe	Ofgem	JB	Committee Member
Lorna Mallon	Code Manager	LM	Subject Matter Expert
Glenn Sheern	Code Manager	GS	Subject Matter Expert
April Harbour	Code Manager	AH	REC Technical Services
Florentina Monea	Code Manager	FM	Change Analyst
Harriet Truss	Code Manager	HT	Change Analyst
James Hardy	Code Manager	JH	Change Analyst
Mica Thomas	Code Manager	MT	Change Analyst
Paul Witton-Dauris	Code Manager	PWD	Head of Change
Holly Law	Code Manager	HL	Change Delivery Manager
James Rees	Code Manager	JR	Secretariat

1 INTRODUCTIONS

The Chair welcomed attendees to the meeting of the REC Change Panel (RECCP). The Chair advised apologies were received from Martin Brailsford, but that his votes had been submitted via proxy.

2 CONFIRMATION OF AGENDA

The Chair invited any additional items of business for consideration during the meeting; no additional items of business were raised.

3 APPROVAL OF PREVIOUS MINUTES

RECCP Members unanimously approved the draft minutes from the previous meeting held on 01 July 2025. The approved minutes will be published as 'final' and made available via the Portal no later than 16 July 2025.

4 I0240 – DATA ALIGNMENT OF METER INFORMATION THROUGH MHHS MIGRATION

As the Lead Analyst for I0240, JH provided an overview of the Issue.

JH informed Members this issue looks to address that when meter updates are made during a Market Wide Half-Hourly Settlement (MHHS) migration, whilst the Meter Technical Details (MTDs) will be shared between participants, there will be no update sent to the Registration Service. JH advised this is due to the gaining Meter Operator Agent (MOA) not knowing that they need to send a D0312 (for reverse migration) or IF005 (for forward migration), and the losing MOA cannot send the message.

JH informed Members that during MHHS migration, key Market Messages from the losing MOA, such as IF005, D0139, D0205 and D0312 are rejected by the Registration Service. JH explained this will prevent updates to the Energisation Status and Meter Details. JH highlighted this will create a risk of data misalignment, as the gaining MOA may not be aware that updates occurred and therefore cannot resent them.

JH informed Members no cross-code impact has been identified at this stage. JH noted the issue affects the MHHS Programme, therefore there will be continued engagement between the Code Manager and the MHHS Programme to ensure this issue is appropriately managed and progressed. JH commented the Code Manager will remain in engagement with the Balancing and Settlement Code (BSC) in case any cross-code change with the BSC is required.

KF noted the Proposal Plan includes Solution Development ending in September, and then potentially an Impact Assessment, however the Change Report states I0240 is required for M8. KF asked how the timings are going to be carried out. JH advised the Change Report may need updating, but as I0240 impacts MHHS, the impacts will potentially begin around M8. JH explained I0240 will need to progress very quickly after M8. LM mentioned parties have been informed if there are known metering jobs that are outstanding, don't migrate these over to MHHS. LM advised this decision was made after discussions at the Change Issues Group (CHIG).

JH provided Members with an overview of the milestones within the Proposal Plan.

Milestone	Activity	From	To
Definition		**07 Jul-25**	**31 Sept-25**
	Solution Analysis	July	September
	Solution Development	July	September

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve the Proposal Plan for I0240.

5 R0241 – MHHS INCREMENTAL CHANGES FOR GO-LIVE

As the Lead Analyst for R0241, HT provided Members with an overview of the Authority Determined Final Recommendation Change Report.

HT informed Members that R0241 looks to deliver critical updates to the REC MHHS Code Drafting, which was approved by the Authority through R0209 – Implementation of MHHS Agreements, that are required for MHHS Go-Live at MHHS Programme Milestone 8 'Code changes delivered'. HT advised seven REC documents (Schedules and Service documents) and the Data Specification have been updated.

HT informed Members that a Consultation was issued from 17 June – 01 July 2025, with seven responses received from DNO's and Suppliers. HT explained the responses supported the changes to be made in R0241, agreed the implementation at MHHS Milestone 8 and that there were some suggested changes to the drafting in Schedule XX – MHHS Migration.

HT informed Members that two additional scope items have been included in the R0241 solution, both impacting Schedule XX - MHHS Migration.

HT explained one of the scope items is for MOA appointments on a Change of Agent Migration, the 60-minute SLA does not apply and there is a processing deadline of 23:00 which applies to messages received before 17:00. HT advised this has been reviewed with the Programme design and BSC drafting experts, and that the drafting for the relevant SLAs had been updated to reflect the design.

HT explained the other scope item related to 'Losing Supplier' having been included in the drafting and process steps for the New Connections process in relation to migration. HT highlighted there is no Losing Supplier for a New Connection and a subsequent Initial Registration, therefore this has been removed.

HT noted that the Code Manager did not consider any impact to the Case for Change from the new scope items and that this had been noted in the Assumptions in the Change Report. HT also confirmed that Ofgem, as the Proposer of the change, supported their inclusion in R0241.

KF asked if any of the MHHS Stakeholder Advisory Group (MSAG) members joined the Change Issues Group (CHIG) to discuss this Change. HT advised several members from MSAG joined the CHIG and some of those who couldn't, had confirmed they had reviewed the material being presented. KF noted there were a few comments on the Consultation, specifically around Gaining Suppliers and guidance being added into the Electricity Enquiry Service (EES) API document. KF asked if any timings have been determined for these to be implemented. HT advised timings still haven't been determined, however they have been added to the list the Code Manager and be prioritised alongside other potential changes and issues.

HT provided Members with an overview of the milestones in the Proposal Plan and stated they would be voting to approve the proposed change solution, proposed implementation approach and proposed implementation as the date determined by the Authority in line with MHHS Programme Milestone 8 'Code changes delivered'.

Milestone	Activity	From	To
Definition		**06 Feb 25**	**31 May 25**
	Solution Development	February	May
	Impact Assessment	March	May
Change Proposal		**01 Jun 25**	**15 Jul 25**
	Consultation	17 Jun 25	01 Jul 25

	Final Determination	July	July
Voting		**15 Jul 25**	**15 Jul 25**
	Issued for Authority Determination	17 Jul 25	17 Jul 25

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve the proposed change solution;
- **AGREED** unanimously to approve the proposed implementation approach; and
- **AGREED** unanimously to approve the proposed implementation as the date determined by the Authority in line with MHHS Programme Milestone M8 'Code changes delivered'**.**

6 R0251 – AMENDING BUSINESS CASE FOR R0044

As the Lead Analyst for R0251, HL provided an overview of the Change.

HL informed Members that R0044 MHHS Programme Changes required to Central Switching Service (CSS) was raised by the MHHS Programme. HL explained this was to implement the necessary REC changes in relation to a new Data Communications Company (DCC) User Role for the Meter Data Retrieval (MDR) service. HL highlighted in the Business Case Assessment for this change, the costs provided by the CSS Provider in the Change Report for Consultation were £297,000, which was approved for implementation on the data that is determined by the MHHS Programme for its milestone M8 'Code changes delivered'.

HL informed Members that during MHHS SIT, additional requirements have been identified by the CSS Provider, which means the Business Case for R0044 is no longer accurate.

KF asked if there was a way the Code Manager can obtain more reliable cost estimates initially. HL highlighted R0251 is quite unique, where the costs have changed significantly after initial approval, due to additional requirements identified during MHHS System Integration Testing (SIT). HL advised that for future CSS changes, the costings for the build and design may be requested upfront, which should lead to a much more accurate cost.

HL provided Members with an overview of the milestones in the Proposal Plan and stated they would be voting to approve the Proposal Plan and that the Change Report has sufficient information to progress to Consultation.

Milestone	Activity	From	To
Change Proposal		**09 Jun-25**	**18-Aug-25**
	Business Case Assessment	June	June
	Consultation	July	August
	Final Determination	August	August
Voting		**19 Aug-25**	**19 Aug-25**

	Appeal Window	20 August	2 September

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve that the Proposal Plan & that it contains sufficient information to progress to Consultation.

7 I0252 – INCREASING FREQUENCY OF ANNUAL PORTFOLIO RECONCILIATION EXERCISE TO SUPPORT DATA CLEANSE

As the Lead Analyst for I0252, MT provided an overview of the Issue.

MT informed Members that the reconciliation data for gas is currently being received annually, however, to align with data cleanse activity, the reporting will need to have an increase in frequency from annually to bi-annually. MT advised that data cleanse sprint three, run by the REC Performance Assurance, requires the cleansing of gas metering data. MT highlighted the source data for this is an annual reconciliation performed by the Central Data Service Provider (CDSP) and to assist with the effectiveness of the data cleanse activity, the report needs to be run more frequently.

MT informed Members this issue was not raised with a fully formed solution, however the solution is a minor adjustment to the legal text.

MT provided Members with an overview of the milestones within the Proposal Plan.

Milestone	Activity	From	To
Definition		**13 May-25**	**31 Aug 25**
	Solution Analysis	May	June
	Solution Development	June	July
	Legal Review	August	August
	Impact Assessment	August	September

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve the Proposal Plan for I0252.

8 I0253 – THEFT – DNO/NETWORKS NOT PROVIDING PHOTOS

As the Lead Analyst for I0253, MT provided an overview of this Issue.

MT informed Members that when a DNO attends a site where a suspected Energy Theft has been reported, they make the site safe. MT advised when attending there is no current obligation for them to take photos of the metering equipment, and without these photos, Suppliers may not be able to quality for the Theft Detection Incentive Scheme (TDIS).

MT provided Members with an overview of the milestones within the Proposal Plan.

Milestone	Activity	From	To
Definition		**01 Jun-25**	**01 Sep-25**
	Solution Analysis	June	August
	Solution Development	August	September

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve the Proposal Plan for I0253.

9 R0259 – UPDATE TO R0173 IMPLEMENTATION DATE

As the Lead Analyst for R0259, FM provided an overview of the Change.

FM informed Members R0173 seeks to update the implementation date of R0173 – Improvements to the Theft Detection Incentive Scheme (TDIS), following the Authority's decision to approve. FM highlighted that without an update to the implementation date of R0173, the Code Manager would not be able to implement the proposed solution following Authority Approval. FM explained the Code Manager engaged with the Theft Issues Group (TIG) on 28 May 2024 on the scope of this Change Proposal and their preferred date to implement R0173.

FM informed Members a Consultation was issued from 20 June – 04 July 2025, however no responses were received from parties. FM mentioned the Code Manager is not concerned by the lack of responses, as feedback from TIG was included in the Proposal.

FM provided Members with an overview of the milestones within the Proposal Plan and stated they would be voting to approve the proposed change solution, proposed implementation approach and proposed implementation date of 22 September 2025 with an effective from date of 01 October 2025.

Milestone	Activity	From	To
Change Proposal		**04 Jun-25**	**15 Jul-25**
	Consultation	**Complete**	**Complete**
	Final Determination	July	July
Voting		**15 Jul-25**	**15 Jul-25**
	Appeal Window	16 July	30 July

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve the proposed change solution;
- **AGREED** unanimously to approve the proposed implementation approach; and
- **AGREED** unanimously to approve the proposed implementation date of 22 September 2025 with an effective from date of 01 October 2025.

10 R0263 – SHARING CONFIRMED ENERGY THEFT DATA WITH THE BSC

As the Lead Analyst for R0263, JH provided an overview of the Change.

JH informed Members R0263 provides a legal text amendment to REC Schedule 7 – Energy Theft Reduction, Annex 3 Clause 6.4, to include the BSC in the list of organisations and Parties who should be shared the data relating to confirmed Energy Thefts. JH advised there is a gap in the provision of the REC that means Energy Theft data is not able to be shared with the BSC for purposes of use within Settlement. JH mentioned without the ability to have this data shared with them, the BSC are unable to confirm that all Energy Theft data has been correctly entered into Settlement.

JH provided Members with an overview of the milestones within the Proposal Plan.

Milestone	Activity	From	To
Definition		**03 Jul-25**	**31 Aug-25**
	Service Provider Impact Assessment	July	August
Change Proposal		**01 Sept-25**	**06 Oct-25**
	Business Case Assessment	September	September
	Consultation	September	September
	Final Determination	September	October
Voting		**07 Oct-25**	**07 Oct-25**
	Appeal Window	08 October	22 October

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve the Proposal Plan for R0263.

11 R0264 – DATA SPECIFICATION HOUSEKEEPING

As the Lead Analyst for R0264, HL provided an overview of the Change.

HL informed Members that within REC Products, the Code Manager has identified several formatting and typographical errors, as well as opportunities to provide clarity, improve accuracy and consistency across the REC Products and Services. HL explained these changes have been assessed as meeting the criteria to be progressed via a Housekeeping Change Proposal.

An overview of the REC Products impacted by R0264, including a description of the change can be found below.

REC PRODUCT	CHANGE DESCRIPTION
Energy Market Data Specification	Remove any N/A & NA that preside within the Energy Market Data Specification (in all formats). These will present as blank fields instead.
Energy Market Data Specification	Remove any spurious characters that exist within the Energy Market Data Specification (in all formats)

Energy Market Data Specification	Unseen characters used in legal drafting (where .doc/.xls formats) becoming visible when loading into the database, which then show erroneously as '%' or 'CR' to be removed from Energy Market Data Specification (in all formats).
Energy Market Data Specification	Amend the Energy Market Data Specification (in all formats) to ensure speech marks are replaced by double apostrophes' as appropriate.
Energy Market Data Specification	The Code generates certain characters (i.e >) in SQL, but when publishing that on the Digital Navigator Platform (Market Messages) the code is presented (>) rather than the appropriate characters.
EMDS Standards Definition Document	Add VAS (Volume Allocation Service) as an Entity within the Energy Market Standards Definition Document

HL informed Members the Code Manager considers there is a positive case to implement this Change Proposal. HL advised this is on the basis that the proposed solution is fully formed and appropriately resolves the problem statement.

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve R0264 for implementation on 22 September 2025.

12 CHANGE PROPOSAL TRACKER

HL provided Members with the latest Change Proposal Tracker Update.

HL informed Members that R0263 – Sharing Confirmed Energy Theft data with the BSC was accepted as new change on 03 July 2025. HL advised R0264 – Data Specification Housekeeping was accepted as a new change on 04 July 2025. HL highlighted I0265 – Theft Calculator Usage and Suitability Assessment was accepted as a new Issue on 10 July 2025 and I0266 – REC Data Specification Clarifications was accepted as a new Issue on 11 July 2025.

HL informed Members that on 09 July 2025, the MEP voted to approve R0244 – C21 to be introduced into STIRG Document for implementation in the February 2026 Release. HL noted on 09 July 2025, MEP approved there was enough information in the Change Report (for Consultation) for R0216 – REC Changes to tie in with DCP419 to progress to Consultation. HL mentioned the Consultation opened on 11 July 2025 and will close on 08 August 2025.

JH provided Members with an overview of I0213 – Creation of a Mechanism to allow Third-Parties to Report Objection Activity. JH explained that following the Code Manager's review of the Party Impact Assessment (PIA), and a further legal review by REC Legal Advisors, the Code Manager will make the decision to reject I0213.

JH informed Members that the REC sets out the process by which a Supplier Licensee may make a request to Object, however the power to object does not originate from the REC. JH advised the power to Object is granted under the SLCs (condition 14). JH explained only licensed Energy Suppliers can raise Objections, and only under specific conditions set out in the SLCs. JH highlighted the REC reflects this limitation and does not grant Third-Parties the right to object to, or formally challenge, Objections.

JH informed Members that as the Objection process is prescribed under the SLCs, rather than the REC, any non-compliant Objection activity could be deemed as a breach of the SLCs. JH noted it would be unlikely that Ofgem would consider it appropriate for the REC PAB to use evidence submitted by the proposed mechanism to rule on compliance with its licence conditions.

JH informed Members the mechanism would not realistically be able to achieve the aims of the Issue. JH noted legal advice showed that although the Issue is not necessarily suggesting changes to the REC itself, the effect of the proposal is to informally extend rights that are currently applied to REC parties, to Non-REC parties, to deal; with what are in essence breaches of the SLCs through a mechanism that is not set up to do so.

JH informed Members legal advice stated the proposal is something that is not appropriate to try and achieve under the REC, but a provision could be made in future through a change to SLC Condition 11B. JH noted whilst the Code Manager had previously accepted I0213 into the Change/Issue process, paragraph 8.5 of Schedule 5 – Change Management allows the Code Manager to revisit the consideration of an issue, if new analysis or evidence is available as a result of an Impact Assessment or otherwise.

JH informed Members the Code Manager reasonably believes that I0213 concerns matters that are outside of the scope of the REC and if this issue is progressed to a Change Proposal, it would have no reasonable prospect of being approved by the Responsible Committee. JH highlighted the Code Manager has engaged with the Proposer and has offered further assistance should they wish to submit a new REC issue that would be in scope of the REC.

BA mentioned a lot of effort and time is taken up by the Code Manager looking at Issues that are raised by Non-REC Parties that are ultimately funded by REC Parties only. BA noted it is important for the right outcomes to come through when Consultations and Impact Assessments are issued and that engagement between REC Parties and Non-REC Parties is effective and appropriate. JH agreed and noted that should a REC Party have any concerns with the behaviour of another stakeholder, they should raise this with their Operational Account Manager who will be able to assist. JH advised the Code Manager will be hold further discussions with RECCo on the standards that are expected from Non-REC Parties during the Consultation and Impact Assessment process.

HH asked if I0213 sets any precedent for Third-Party involvement in the REC and the changes they raise. JH advised Issues raised by Third Parties be treated on a case-by-case basis, dependent upon the scope of the Issue that they raise. JH explained the Code Manager advised the Proposer that limiting I0213 to Objection activity made it difficult for the Issue to be within scope of the REC, with the legal advice supporting this. JH highlighted if changes proposed by Third Parties were to include a wider scope, then they would have a greater chance of being progressed through the REC Change Process.

JH informed Members they would be voting to approve the rejection of this Change Submission.

RECCP Members noted the Code Manager's recommendation; and

- **AGREED** unanimously to approve the rejection of this Change Submission.

13 ANY OTHER BUSINESS

No additional business was discussed. The Chair closed the meeting.