RETAIL ENERGY CODE

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REC CHANGE PANEL MEETING
MEETING MINUTES

MEETING	**RECCP_25_0805**
DATE	**05 August 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
Andy Clasper	Gas Networks	AC	Committee Member
Martin Brailsford	Metering Equipment Managers	MB	Committee Member
Alex Travell	Electricity Networks	AT	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
Lorna Mallon	Code Manager	LM	Subject Matter Expert
Caroline Mettam	Code Manager	CM	REC Technical Services
Annabel Ashworth	Code Manager	AA	Change Analyst
Caroline Freimuller	Code Manager	CF	Change Analyst
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
Tina Pearce	Code Manager	TP	Head of Governance
Harry Firth	Code Manager	HF	Secretariat

1 INTRODUCTIONS

The Chair welcomed attendees to the meeting of the REC Change Panel (RECCP).

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 15 July 2025. The approved minutes will be published as 'final' and made available via the Portal no later than 06 August 2025.

4 R0191 – INTRODUCTION OF SLA FOR SUPPLIER DE-REGISTRATIONS OF DISCONNECTED METERS

As the Lead Analyst for R0191, CF provided an overview of the Change. CF advised that R0191 introduces a 20 working day Service Level Agreement (SLA) for electricity Suppliers to deregister disconnected meters. CF explained that the change had originally applied to both electricity and gas, but following impact assessment, it was now limited to electricity only.

CF clarified that Suppliers are already required to either submit a registration deactivation request or raise a dispute with the Distribution Network Operator (DNO) via Secure Data Exchange Portal (SDEP) upon receiving a disconnection notice. However, there is currently no timeframe for these actions, with this Change aiming to add an SLA on electricity Suppliers.

CF advised that two consultation responses were received, both supportive. CF added that one respondent agreed with the legal text without comment, while the other suggested additional obligations for DNOs, which were deemed out of scope. The Code Manager encouraged this respondent to raise a separate change for this to be investigated.

CF advised that one respondent was supportive of the proposed implementation date of 07 November 2025 while the other had suggested delaying the implementation date to February 2026 due to perceived system changes. CF advised that the proposed implementation date of 07 November 2025 would still be recommended by the Code Manager, who had reviewed this matter following the closure of the consultation and believed that no system changes are required, based off of feedback received from other electricity Suppliers.

PG asked whether the implementation would be monitored. CF and LM confirmed that the REC Performance Assurance team already tracks deregistration activity. LM added that monitoring began in January, with 45,000 cases initially identified, now reduced to 39,000, of which 23,000 of the original 45,000 cases have not been deregistered yet.

CF told Members they would be voting to approve the proposed change solution, proposed implementation approach and proposed implementation as the date of 07 November 2025.

Milestone	Activity	From	To
Definition		**14-Jan-25**	**31-May-25**
	Code Manager initial assessment	January	January
	Solution Development	January	April
	Change Issues Group	April	April
	Impact Assessment	April	May
Change Proposal		**01-Jun-25**	**18-Aug-25**
	Business Case Assessment	June	June
	Consultation	June	July
	Final Determination	July	August
Voting		**19-Aug-25**	**19-Aug-25**
	Appeal Window	20-Aug-25	04-Sep-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 of 07 November 2025.

5 R0232 – NON-DOMESTIC CHANGE OF OCCUPIER SDEP SCREENS (R0155 SOLUTION)

As the Lead Analyst for R0232, JH provided Members with an overview of the Change. R0232 is aiming to mandate the use of the Secure Data Exchange Platform (SDEP) for sharing evidentiary documents in the non-domestic change of occupier process. This proposal follows the implementation of R0155 - Change of Occupier: Evidentiary Standards and Timescales and addresses limitations caused by the Market-wide Half-Hourly Settlement (MHHS) code freeze.

JH explained that duplicate meter point screens are currently being used as a workaround. JH added that a service provider impact assessment has been completed, confirming the feasibility, cost, and timeline for developing dedicated screens.

JH advised that the updated implementation plan includes a consultation in August, a final determination in September, and a vote in October, aiming for a November 2025 release. The Panel was asked to approve the updated plan and progression to consultation. No objections were raised, and the proposal was approved.

6 R0243 – TRANSFER OF SSC AND TPR DATA ITEM OWNERSHIP

As the Lead Analyst for R0243, HT provided an overview of the Change Proposal. R0243 is aiming to transfer ownership of four data items, relating to Standard Settlement Configuration (SSC) and Time Pattern Regime (TPR), from the Balancing and Settlement Code (BSC) to the Retail Energy Code (REC).

HT advised that this change aligns with the MHHS design, where these items are no longer used in settlement but remain relevant for retail processes.

HT confirmed that the change is administrative and does not involve technical modifications. HT added that a corresponding Balancing and Settlement Code (BSC) change is being finalised, and consultations will be aligned. BA asked why no impact assessment was conducted. HT responded that no technical changes were involved.

The Panel was asked to approve the Proposal Plan and that the Change Report was ready to progress to consultation. No objections were raised, and Panel Members voted unanimously to approve both.

7 R0248 – REC CHANGES TO TIE IN WITH DCP451 – SUSPENDING REGISTRATIONS

As the Lead Analyst for R0248, CF provided an overview of the Change. CF added that R0248 has been developed in coordination with Distribution, Connection and Use of System Agreement (DCUSA) Change DCP451 – Suspending Registrations. The proposal clarifies the process for when a DNO ends a regulatory alliance with an Energy Supplier.

CF advised that five consultation responses were received, all supportive. CF confirmed all respondents agreed with the proposed solution and had not identified any consequential changes required from DCP451 that had not already been made. CF added that one respondent had suggested new obligations for the Central Switching Service (CSS), which were deemed out of scope. The Code Manager encouraged this respondent to raise a separate change for this to be investigated. CF confirmed that no changes were made to the legal text following consultation and that all respondents were supportive of the proposed implementation date.

CF stated Members would be voting to approve the proposed change solution, proposed implementation approach and proposed implementation as the date of 07 November 2025.

Milestone	Activity	From	To
Definition		**06 Mar 25**	**19 Jun 25**
	Code Manager Initial Assessment	March	March
	Solution Development	April	May
	Legal Review	May	June
	Business Case Assessment	June	June
Change Proposal		**20 Jun 25**	**18 Aug 25**
	Consultation	June	July
	Solution Refinement	July	August
	Final Determination	August	August
Voting		**19 Aug 25**	**19 Aug 25**
	Appeal Window	20 Aug 25	04 Sep 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 of 07 November 2025.

8 R0255 – TERMS OF REFERENCE UPDATES

HL provided an overview of the Issue. R0255 is aiming to update the terms of reference for the Performance Assurance Board (PAB) and the Cross Code Steering Group (CCSG). HL advised that the changes would allow SEC representation at PAB and remove limitations on which industry codes can attend CCSG.

HL advised that the consultation received one supportive response. HL added that CCSG and PAB had both already approved the updated terms. HL confirmed that no changes to the legal text were required.

HL 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 of 07 November 2025.

Milestone	Activity	From	To
Definition		**20 May 25**	**03 June 25**
	Code Manager Assessment	May	June
Change Proposal		**03 June 25**	**24 Jun 25**
	Business Case Assessment	June	June
	Consultation	June	July
	Final Determination	July	August
Voting		**05 Aug 25**	**05 Aug 25**
	Appeal Window	06 Aug 25	19 Aug 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 of 07 November 2025.

9 R0257 – CHANGE TO REC FOR DATA PROCESSING OUTSIDE OF EEA

As the Lead Analyst for R0257, FM provided an overview of this Change Proposal. R0257 is aiming to remove the requirement for REC Board approval before processing REC data outside the European Economic Area (EEA). FM explained that this step does not add any additional risk mitigation beyond what is already required under UK General Data Protection Regulation (GDPR).

FM advised that two consultation responses were received, both supportive. KF asked whether the REC Board audits on data processing outside the EEA actually take place and where results are reported. FM agreed to follow this up. PG noted that the REC Board had recently delegated this authority to senior management team in RECCo.

FM 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 of 07 November 2025.

Milestone	Activity	From	To
Definition		**03 Jun-25**	**14 Jul-25**
	Legal Review	**Complete**	**Complete**
Change Proposal		**15 Jul-25**	**15 Sep-25**
	Business Case Assessment	**Complete**	**Complete**
	Consultation	**Complete**	**Complete**
	Solution Refinement	**Complete**	**Complete**
	Final Determination	**Complete**	**Complete**
Voting		**16 Sep-25**	**16 Sep-25**
	Appeal Window	September	September

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 of 07 November 2025.

10 OFGEM UPDATE

CU informed Members that Ofgem have now published their preliminary Strategic Direction Statement (SDS) to help coordinate and prioritise strategic change across industry codes. The SDS contains a strategic assessment of government policies and developments in the energy sector that they consider will or may require code modifications. CU advised that this is a precursor to the SDS that will be published annually following designation of industry codes. CU added that Ofgem recognise the value placed on early engagement during development of the SDS and intend to maintain this approach going forward. CU advised that a preliminary SDS consultation decision document has been published alongside the final preliminary SDS. This outlines Ofgem's rationale and development process for the implementation and content of the preliminary SDS. CU advised that the document also outlines Ofgem's conclusions, the rationale behind their positions, and next steps for developing and introducing a harmonised prioritisation process for code modifications. It also confirms their decision to proceed to further consultation under Schedule 12 to the Energy Act 2023 and sets out the next steps regarding the proposed cooperation Standard Licence Condition (SLC).

CU informed Members that Ofgem have published their proposals to grant code manager licences to Elexon and RECCo for the BSC and REC codes respectively. These documents set out the reasons for

Ofgem's decision and are open to stakeholder representations for a period of 28 days. CU advised that Ofgem are pleased to be making continued progress toward granting the first code manager licences for the BSC and REC, scheduled for 2026. CU advised that Ofgem are advancing their broader work on the code manager selection process for future phases, including the intention to consult on draft guidance and criteria on the competitive process in due course, alongside plans to begin the selection process for phase two codes later this year.

11 MHHS EXPEDITED CHANGE PROCESS

HT and TP jointly presented a proposal to introduce expedited procedures for handling urgent Market-wide Half-Hourly Settlement (MHHS) changes. HT advised that although the likelihood of urgent changes arising before the September go-live date is decreasing, there remains a possibility that critical issues may emerge either immediately before or during the transition period.

The 18-month transition period following go-live, during which migrated metering points and newly qualified parties may encounter unforeseen problems. HT added that these issues could require rapid intervention to avoid Consumer detriment or disruption to the MHHS implementation. HT advised that in such cases, the Issue Resolution Group (IRG), a cross-code governance body under the MHHS Programme, would assess the issue and develop a fully formed solution, including legal text and impact assessments, before passing it to the relevant code bodies for implementation.

TP informed Members on the proposed procedural adjustments. TP explained that the REC Secretariat would manage MHHS changes using existing processes but with increased flexibility. Specifically, the proposal included three key changes:

- Reduced Notice Periods for Meetings: Meetings could be convened with less than five working days' notice, and in exceptional cases, with as little as three hours' notice.
- Shortened Paper Review Periods: The standard five-day review period for meeting papers could be shortened to allow quicker decision-making.
- Change Panel Oversight: The Change Panel would assume responsibility for urgent proposals that are normally be handled by the Technical Expert Panel (TEP) or Metering Expert Panel (MEP), ensuring timely governance decisions.

BA raised concerns about the practicality of convening meetings on such short notice, especially given the busy schedules of Panel members. HT acknowledged these concerns and assured the Panel that early warnings would be provided, wherever possible. TP and HT emphasised that the expedited process would only be used in exceptional circumstances and that existing meetings could be leveraged to minimise disruption.

HH asked whether there was any formal governance defining what constitutes "exceptional circumstances." HT responded that the IRG operates under its own terms of reference and would be responsible for determining urgency and appropriateness of expedited handling.

RECCP Members noted the contents of the presentation; and

- **AGREED** unanimously to approve that meetings can be held with less than five working days' notice
- **AGREED** unanimously to approve that the paper review period can be shortened
- **AGREED** unanimously that Change Panel may be the responsible committee for any urgent Change Proposals that would normally be delegated to MEP or TEP.

12 QUARTERLY UPDATE ON ISSUES

HL provided Members with a quarterly update on all raised Issues in the REC since the changes to the Change Management process were introduced in June 2024.

HL advised that:

- 57 Issues have been raised
- 12 are at the initial assessment stage
- 8 are at the solution development stage
- 3 are out for Service Provider or Party impact assessments
- 18 have progressed to Change Proposals
- 7 have been withdrawn/ rejected
- 7 are on hold
- 2 have been resolved without the need to take the Issue further

13 CHANGE PROPOSAL TRACKER

HL provided Members with the latest Change Proposal Tracker Update and informed Members that.

- I0267 - Smart Meter Installation Surveys - Microbusiness requirements was accepted as a new Issue by the Code Manager on 17 July 2025.
- I0268 - Consequential Cross-Code Change for BSC P441 - Complex Site Classes Creation was accepted as a new Issue by the Code Manager on 28 July 2025.
- R0269 - Schedule 5 – Change Management: Clarity and Typographical Review was accepted as a new Change by the Code Manager on 24 July 2025.
- I0270 - Clarification of SIP Qualification Requirements was accepted as a new Issue by the Code Manager on 24 July 2025.
- I0271 - Clarification of ASP, AMI, and EMO Accession Requirements was accepted as a new Issue by the Code Manager on 31 July 2025.

HL informed Members that one submission was rejected. HL advised that this proposal had suggested mandating the use of the What3Words geolocation tool to pinpoint meter locations. HL explained that while What3Words can be useful, it does not provide sufficient detail for multi-level buildings or secure commercial sites. HL added that the Code Manager concluded that it should remain an optional tool and not be mandated across the industry.

HL advised that two significant proposals:

- R0169 - Introduction of End of Gate Closure Notifications and R0178 - Improvements to CSS Business Logic are currently undergoing business case assessment and will be discussed at the upcoming Change Issues Group meeting on 07 August.
- R0223 - Reconciliation of Unallocatable Transactions Review is out for consultation and will be brought to the Panel for final recommendation in early September.

14 ANY OTHER BUSINESS

AA introduced themselves to Members as a new Change Analyst for the Code Manager.

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