RETAIL ENERGY CODE

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REC CHANGE PANEL MEETING
MEETING MINUTES

MEETING	**RECCP_25_0902**
DATE	**02 September 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
Paul Everett	Non-Domestic Suppliers	PE	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
Alice Williams	Consumers	AW	Committee Member
Lorna Mallon	Code Manager	LM	Subject Matter Expert
April Harbour	Code Manager	AH	REC Technical Services
Annabel Ashworth	Code Manager	AA	Change Analyst
Francine Peyroux-Sissoko	Code Manager	FPS	Change Analyst
James Hardy	Code Manager	JH	Senior Change Lead
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 had been received by Harry Hailwood, with his alternate Paul Everett attending as the Non-Domestic Supplier Committee Member.

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 19 August 2025. The approved minutes will be published as 'final' and made available via the Portal no later than 03 September 2025.

4 ACTIONS LOG

JR provided Members with an overview of the Actions Log;

RECCP_25_0819_06_01 – The Code Manager to investigate the root cause on how CSS and ERDS Discrepancies may occur – Closed.

HL informed Members that engagement has started with the Technical Change team, who advised that Change Proposals have previously been raised to investigate why Central Switching Service (CSS) and Electricity Retail Data Service (ERDS) discrepancies occur. HL advised investigations are already underway, with data currently being reviewed as part of this process. HL also highlighted that R0201 – Creation of a Tool to Manually Correct ERDS/CSS Discrepancies is currently out for Consultation. As part of this, a specific question has been included to explore the underlying reasons for the discrepancies. HL advised that once the Consultation has closed, the Final Recommendation will be presented to RECCP. This will outline the actions being taken to address the discrepancies, along with any additional proposed changes.

5 I0186 – NON DUAL-FUEL GAS PSR CONSUMER

As the Lead Analyst for I0186, JH provided an overview of the Issue.

JH advised that Consumers who receive electricity and gas from two separate Energy Suppliers often face challenges when trying to register for Priority Services with both Suppliers. JH explained this issue arises because there is currently no mechanism to facilitate the sharing of Priority Services Register (PSR) data between Energy Suppliers for dual-fuel Consumers.

JH highlighted this gap in data sharing was a known limitation when improvements to the PSR were implemented and was acknowledged by Ofgem as needing to be addressed in the future. JH advised the absence of a dual-fuel link means that data flows triggered by one Supplier are not automatically shared across both energy types, leaving some Consumers unregistered for essential services.

JH advised Members that while non dual-fuel Consumers represent less than 10% of domestic households, not all require PSR support, however for those who do, it is essential that their needs are captured and shared using existing two-way data flows and standard processes. JH highlighted that

addressing this issue would ensure vulnerable Consumers are properly supported, regardless of their Supplier arrangements.

JH informed Members that the Code Manager has been engaging with impacted stakeholders during the Solution Development phase of this Issue, to determine possible solution options. JH noted one possible option is to utilise the PSR data held by Electralink, who are involved in the Data Transfer Network (DTN) process. JH advised that the Code Manager has initiated discussions with both Electralink and the Proposer to discuss a possible Sandbox, to further explore this possible solution.

JH commented that the Sandbox application is expected to be made in 2025. JH highlighted that due to the Sandbox being vital to the development and progression of this Issue, the Code Manager recommends that I0186 is placed On-Hold, until the Sandbox trial has been completed, or until the Code Manager can effectively determine the next steps and whether this would be a suitable option via the Change Issues Group (CHIG).

JH informed Members they would be voting to approve to place Issue I0186 On-Hold.

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve to place the plan for I0186 On-Hold.

6 I0187 – SCHEDULE 8 REVIEW AND BEST PRACTICE GUIDANCE DEVELOPMENT

As the Lead Analyst for I0187, JH provided Members with an overview of the Issue.

JH informed Members that REC Schedule 8 – Unbilled Energy Code of Practice outlines the relationship between Network Parties and Energy Suppliers in respect of Energy Theft and their obligations, to identify and resolve situations by taking appropriate actions. JH explained I0187 seeks to carry out a review of REC Schedule 8 utilising the REC Theft Issues Group (TIG). JH highlighted that REC Schedule 8 has not been thoroughly reviewed since REC go-live, and it has been noted there are some discrepancies in there, along with outdated procedures.

JH explained that the Code Manager, with help from RECCo are reviewing REC Schedule 8 and are currently presenting a draft to TIG Members on the areas that require their input. JH highlighted the Solution Analysis and Solution Development has been ongoing with the TIG, however there are still particular areas which may require further discussion with them. JH mentioned following that, the redlining of REC Schedule 8 will be completed and sent to the REC Legal Advisors for review.

JH informed Members the plan extension requiring approval covers those activities up until the Legal Review, then the Code Manager will have a clear draft of REC Schedule 8.

AT asked for clarity around how long the Legal Review may take, stating from the Proposal Plan it looks like it could be a rush in January 2026 for it to be concluded. JH advised the intention is to start the Legal Review ahead of January 2026. This is due to Legal Advisors being engaged at various stages throughout the progression of this Issue.

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

Milestone	Activity	From	To	From	To
Definition		~~26 Sept-24~~	~~30 June-25~~	**26 Sept-24**	**30 Jan-26**
	Solution Analysis	~~Complete~~	~~Complete~~	**Complete**	**Complete**
	Solution Development	~~March~~	~~September~~	March	January
	Engagement with the Theft Issues Group	-	-	August	January
	Legal Review	~~September~~	~~September~~	January	January

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve the extension to plan for I0187.

7 R0223 – RECONCILIATION OF UNALLOCATABLE TRANSACTIONS REVIEW

As the Lead Analyst for R0223, JH provided an overview of the Change.

JH informed Members that following the last Reconciliation of Unallocatable Transactions for gas, the Code Manager identified opportunities to improve the current process, enhance clarity for Parties, and align the approach across both electricity and gas. JH highlighted the current processes are not aligned between the two fuels

JH advised Members that the proposed solution involves legal updates to REC Schedule 11 – Prepayment Arrangements, section 10, to improve clarity and provide detailed instructions for the reconciliation of Unallocatable Transactions. These changes aim to ensure alignment between the processes for electricity and gas, which are not currently harmonised. The proposal seeks to clarify annual reconciliation obligations for both fuels, introduce apportionment rules for acquisitions and mergers (excluding (SoLR)Supplier of Last Resort events) and remove the fixed July reconciliation date for gas. JH noted that removing the fixed July reconciliation date will offer greater flexibility, consider industry capacity and provide more notice to Parties.

These changes will improve financial accuracy and fairness by ensuring unallocatable values are distributed based on current market share and appropriately handled during Suppliers acquisitions or closures. The proposal also aims to reduce operational complexity by resolving ambiguities and aligning processes across both fuels.

The full legal drafting was included in the Change Report and published as part of the Consultation, with updates proposed to clauses 10.2, 10.3, 10.4 and 10.5 of REC schedule 11. Although no responses were received during the Consultation, the Code Manager is confident in the level of pre-consultation engagement prior, with all stakeholder checkpoints documented in the Change Report.

JH informed Members Energy Suppliers at CHIG disagreed around whether the Unallocated Transaction should go to the Supplier who took on the supply, or whether it should be distributed based on mutualised costs of the SoLR. JH noted an Information Request was raised and following that, the Code Manager found that Parties were supportive of a review of the process and identified several areas where they would like to see work undertaken.

The Party Impact Assessment respondent supported the proposal for the Code Manager to initiate the annual reconciliation, noting no risks or costs, and highlighting expected financial and operational benefits.

JH advised Members that they would be voting to approve the proposed solution, proposed implementation approach and the proposed implementation date of 22 September 2025. This date

reflects Party feedback that triggering the process in October 2025, aligned with an existing derogation and would alleviate operational challenges.

RECCP Members noted the Code Managers recommendation; and

- **AGREED** unanimously to approve the proposed solution;
- **AGREED** unanimously to approve the proposed implementation approach; and
- **AGREED** unanimously to approve the proposed implementation date of 22 September 2025.

8 I0265 – THEFT ASSESSMENT CALCULATOR USAGE AND SUITABILITY ASSESSMENT

JH provided an overview of the Issue.

JH informed Members this Issue is seeking to review the usage of the Theft Assessment Calculator and assess its sustainability. JH advised this will allow a consistent approach to reporting Energy Theft data in the industry. JH highlighted the lack of clarity on the calculator's usage and sustainability may be impacting the industry in several ways;

- Inconsistency in assessments
- Best Practice sharing
- Uneven playing field
- Future preparedness
- Consumer detriment

This will be a non-urgent, self-governance change, with RECCP as the Responsible Committee. JH advised this Issue does have a high prioritisation score, due to the potential risk of Consumer detriment and the operational effectiveness impact on REC Parties.

JH advised Members that a lot of research needs to be conducted into the theft calculators, from two aspects. JH explained the first aspect is that Parties have raised that other theft calculators are being used, meaning the Code Manager will need to make assessments between them and the possible differences and impacts. JH advised the second aspect is the anticipation of the REC theft calculators needing a big review, to understand why Parties have not been using them.

JH commented that I0265 will be on the agenda at the TIG meeting in September, with additional engagement taking place between September and November.

JH informed Members they would be voting to approve the issue pathway and the issue timetable.

Milestone	Activity	From	To
Definition		**15 Jul-25**	**30 Apr-26**
	Solution Analysis	July	November
	Solution Development	November	April

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve the issue pathway; and

- **AGREED** unanimously to approve the issue timetable**.**

9 R0269 – SCHEDULE 5 CHANGE MANAGEMENT – CLARITY AND TYPOGRAPHICAL REVIEW

As the Lead Analyst for R0269, JH provided an overview of the Change.

JH informed Members that the Code Manager has identified several opportunities to improve clarity, and correct typographical issues, in REC Schedule 5 – Change Management relating to the Change Proposal and Issue processes. JH highlighted several areas for improvement and areas of ambiguity within REC Schedule 5 have led to confusion for both the Code Manager and REC Parties, and in some cases, have resulted in procedural inefficiencies and unnecessary burdens on Sub-Committees.

JH advised Members that the proposed solution improves process clarity and governance, by refining definitions, submissions criteria, Change Report stages, stakeholder roles, and correcting terminology through legal drafting updates to REC Schedule 5. JH noted whilst this changes includes several borderline housekeeping changes, the Code Manager feels it is appropriate to issue a Consultation, to allow REC Parties visibility of the updates being made. The proposed solution includes the following into REC Schedule 5.

- Further distinction and clarity between Issue and Change Proposal (and Alternatives);
- Clarity for the resolved Issue procedure;
- Clarity on how a submission will only be accepted as a Change Proposal if it includes a fully developed solution;
- The steps for the Code Manager to notify Change Panel if a submission is not accepted;
- Clear distinction on the meaning of each Change Report stage between Proposal Plan, Impact Assessment, For Consultation and Final Recommendation;
- Provision for Responsible Sub-Committees to have the ability to ratify updates to Proposal Plans (paragraph 10.4 – new);
- Clarity on Service Provider Impact Assessment timetables;
- Clarity on how the Code Manager may decide to reissue a Change Proposal for consultation, and how any changes post consultation will be documents in the Change Report (Final Recommendation); and
- Housekeeping updates.

JH informed Members that subject to approval, the Consultation will open on 05 September and close 26 September 2025, with R0269 coming back to RECCP on 07 October 2025 for a Final Recommendation.

JH advised Members they would be voting to approve the Proposal Plan, and that the Change Report contains sufficient information to progress to Consultation.

Milestone	Activity	From	To
Change Proposal		**27 Jul 25**	**20 Oct 25**
	Code Manager Initial Assessment	July	August
	Business Case Assessment	August	August
	Consultation	September	September
	Final Determination	September	October
Voting		**21 Oct 25**	**21 Oct 25**
	Appeal Window	22 October 25	05 November 25

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve the Proposal Plan; and
- **AGREED** unanimously to approve that the Change Report contained sufficient information to progress to Consultation.

10 OFGEM UPDATE

An Ofgem update will be provided at a future RECCP Meeting.

11 CHANGE PROPOSAL TRACKER

JH provided Members with the latest Change Proposal Tracker Update.

JH informed Members two new submissions were accepted by the Code Manager on 21 August 2025, and they are I0277 – Data Latency Service Level Agreement (SLA) Alignment for Gas Enquiry Service and I0278 – Establishing the Safe Isolation Provider (SIP) as a Standalone REC Metering Party.

Other updates are:

- R0169 – Introduction of End of Gate Closure Notifications has been withdrawn by the Proposer following a review of the business case and engagement with the CHIG. This change is currently open for adoption, if Members wish to adopt it, they can email change.management@recmanager.co.uk by 23:59 on 12 September 2025.
- R0207 – Import/Export Meter Operator Agent (MOA) Charging Clarification – The first Working Group will be held on 03 September 2025 (14:00 – 15:30).
- R0232 – Non-Domestic Change of Occupier Secure Data Exchange Portal (SDEP) Screens (R0155 Solution) – The Consultation closed on 01 September 2025, the Code Manager is now reviewing responses and drafting the Final Recommendation. The Change Report (Final Recommendation) is expected to be presented to RECCP, ahead of the schedule in the Proposal Plan, on 16 September 2025.
- I0237 – Erroneous Switch Review – The first Working Group meeting is scheduled for 04 September 2025 (14:00 – 15:30). The agenda and meeting papers were published on the REC portal on 28 August 2025.
- I0240 – Data Alignment of Meter Information through Market-wide Half Hourly Settlement (MHHS) Migration – The draft guidance document, that will act as the proposed solution for

I02450, has been published ahead of discussion at the CHIG meeting on 04 September 2025. The Code Manager is seeking comments and feedback on the document before, during or after the CHIG meeting. The document will also be shared at the next Metering Expert Panel (MEP) meeting.

- R0263 – Sharing Confirmed Energy Theft Data with the Balancing and Settlement Code Company (BSCCo) – The Consultation is open for responses until 08 September 2025. The Change Report (Final Recommendation) is expected to be presented to RECCP, ahead of the Schedule in the Proposal Plan, on 16 September 2025.

12 ANY OTHER BUSINESS

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