RETAIL ENERGY CODE

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REC CHANGE PANEL MEETING
MEETING MINUTES

MEETING	**RECCP_25_1118**
DATE	**18 November 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
Alex Travell	Electricity Networks	AT	Committee Member
Andy Clasper	Gas Networks	AC	Committee Member
Martin Brailsford	Metering Equipment Managers	MB	Committee Member
Sebastian Eyre	Independent SME	SE	Committee Member
Paul Gath	Independent SME	PG	Committee Member
Keith Foster	Independent SME	KF	Committee Member
Faye Brookes-Lewis	Consumers	FBL	Committee Member
Cristina Ullastre	Authority	CU	Observer
Caroline Freimuller	Code Manager	CF	Senior Change Lead
Holly Law	Code Manager	HL	Change Delivery Manager
Talia Lattimore	Code Manager	TL	Lead Analyst
Paul Witton-Dauris	Code Manager	PWD	Head of Change
Paul Rocke	Code Manager	PR	Head of Communications
James Rees	Code Manager	JR	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; one additional item of business was raised at the end of the meeting.

3 APPROVAL OF PREVIOUS MINUTES

RECCP Members unanimously approved the draft minutes from the previous meeting held on 04 November 2025. The approved minutes will be published as 'final' and made available via the REC Portal no later than 19 November 2025.

4 R0179 – PROPOSAL FOR LIMITING QUERIES IN EES API CALLS (SINGLE QUERY PER API CALL)

As the Lead Analyst for R0179, HL provided an overview of the Change.

HL informed Members that there is currently no limit to the number of queries that can be made within a single Application Programming Interface (API) call in the Electricity Enquiry Service (EES). HL explained the absence of a limit on the number of queries within a single API call could cause performance issues and system instability. HL mentioned as a result, system responsiveness may degrade when a large number of queries are made in a single call, impacting user experience and hindering the ability of the EES API to consistently meet these demands.

HL advised the proposal is to implement a limit of one query per single API call. HL confirmed this adjustment is intended to enhance the capacity of EES to consistently meet user demands without impacting its operational performance. HL highlighted the introduction of this limit would necessitate revisions to Section 3 (*Service Functionality*) and Section 5 (*User Limits*) of the EES Service Definition and relevant sections of the EES API Interface Specification.

HL noted limiting queries to one per single API call will see an improvement to performance between 49 and 249 seconds. HL advised it is also best practice for APIs to have a one query per API call ratio and this change would bring this in line with the Gas Enquiry Service (GES), creating alignment across fuels.

HL informed Members that the initial consultation was circulated on 20 June 2025 to obtain views on the Change Report, with four responses received from Energy Suppliers. HL confirmed that two responses were supportive of the change, and two were not. On 19 August 2025, RECCP voted to approve the proposed change solution and proposed implementation approach, however rejected the proposed implementation date of 07 November 2025.

HL advised a second consultation was circulated on 19 September 2025 to obtain views on a new implementation date. HL highlighted one response was received from an Energy Supplier, who stated their preferred implementation date of 27 February 2026, to ensure that any impacts can be addressed that might affect their Market Wide Half-Hourly Settlement (MHHS) migration go-live. HL stated the other Supplier who responded to the initial consultation, did not respond to the second consultation by the closing date. HL confirmed the Code Manager and the Supplier's OAM reached out to them separately, to inform them it was out for a second consultation and gave them an extra week to respond. HL advised they acknowledged the email but did not respond.

HL informed Members they would be voting to approve the proposed implementation date of 27 February 2026.

RECCP Members noted the Code Manager's recommendation; and

- AGREED unanimously to approve the proposed implementation date of 27 February 2026.

5 R0190 – RELATED METER POINT RMP STATUS RULES

As the Lead Analyst for R0190, CF provided an overview of the Change.

CF informed Members that R0190 proposed to allow a Secondary Metering Point with a status of 'Created' to be linked to Primary Metering Points with a status of 'Operational', for MHHS-migrated Metering Points only. CF advised by not allowing Primary Metering Points with a status of 'Operational' to be linked to Secondary Metering Points with a status of 'Created', full advantage was not being taken of the MHHS functionality for automatically appointing agents to Secondary Metering Points.

CF confirmed the proposed solution was to amend REC Schedule 28 – *Related Metering Points*, paragraph 2.3 to allow Secondary Metering Points with a status of 'Created' to be linked to Primary Metering Points with a status of 'Operational' for MHHS migrated Metering Points only. CF highlighted this will reduce the number on steps in the process Energy Suppliers must carry out on Secondary Metering Points, and utilise the functionality provided by MHHS. CF clarified that the functionality already exists, but it was prohibited by the current Code legal drafting.

CF provided Members with the proposed solution legal text drafting. CF mentioned an Information Request was issued from 31 July to 22 August 2025, with three responses received (one Energy Supplier and two Distributor Network Operators (DNOs)). CF stated these responses confirmed the Code Manager's assumption that it is not foreseen that a large number of Related Metering Points will be set up in the future, however it would be useful functionality to have.

CF explained both the Central Switching Service (CSS) and the Metering Point Registration Service (MPRS) Service Providers confirmed there would be no impacts to their systems from the implementation of R0190. CF highlighted the Party Impact Assessment (PIA) ran from 19 September to 10 October 2025, with two responses (one Energy Supplier and one DNO). CF stated both were supportive of the proposed solution, with no comments on the proposed legal text drafting. CF mentioned both confirmed low costs from the implementation of R0190.

CF highlighted the benefits for implementing R0190 are operational effectiveness, with it also being implementable, viable and effectively resolving the problem statement.

CF informed Members they would be voting to approve that the Change Report contains sufficient information to Proceed to Consultation, and pending approval, the Consultation will run from 21 November to 12 December 2025, with the Change Panel vote scheduled for 20 January 2026.

RECCP Members noted the Code Manager's recommendation; and

- **AGREED** unanimously to approve that the Change Report contains sufficient information to progress to Consultation.

6 I0218 – PROPOSAL TO ENABLE BROADER USER OF RETAIL ENERGY LOCATION (REL) DATA FOR NON-SWITCHING APPLICATIONS

As the Lead Analyst for I0218 couldn't attend the meeting, CF provided an overview of the Issue.

CF noted that REC Schedule 29 – *Address Management* states the only permitted usage for REL data is for switching, stating REL address data is synchronised with the Enquiry Services to support switching activities. CF mentioned this can only be shown on public facing websites of approved Price Comparison Websites (PCWs) with prior permission from Ordnance Survey. CF explained that stakeholders (including Energy Consultants, Ofgem and REC Parties) have been unable to benefit from this data, therefore Consumers are unable to benefit from the full potential use of their data.

CF stated that, on 16 September 2025, RECCP approved an update to the Proposal Plan to include an activity of prioritisation of Technical Service Provider Impact Assessments before progressing this issue with a wider proposal plan. CF highlighted that following a review, the Proposer (RECCo) had asked for a non-technical solution to be explored, and such a solution would not require a Technical Service Provider Impact Assessment.

CF mentioned the Code Manager had updated the Proposal Plan to consider a non-technical solution, also assessing interdependencies with REC Change Proposal R0148 – *Introduction of Classification Based Access Model* that had been identified by impacted Stakeholders. Resultantly, CF noted that the Code Manager was proposing that the REC Change Panel is assigned as the Responsible Committee rather than the Technical Expert Panel.

CF noted a comment was received from a Third-Party Intermediary who had stated strong support and urged for a prompt resolution.

KF asked if the Proposal Plan can include the year for when each milestone definition has or will take place. KF mentioned this will be helpful for all future Proposal Plans that are presented to RECCP. The Code Manager agreed to include the year for each milestone definition in all future Proposal Plans.

CF provided Members with the updated milestones within the Change Report Proposal Plan for I0218.

Milestone	Activity	From	To
Definition		**05 Dec 2024**	**31 Mar 2026**
	Solution Development	December 2024	February 2026
	Non-Technical Service Provider Impact Assessments	Completed	Completed
	Legal Review	January 2026	February 2026
	Party Impact Assessment	February 2026	February 2026
	Solution Refinement	March 2026	March 2026

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve the amendment to the Responsible Committee (from Technical Expert Panel (TEP) to Change Panel); and
- **AGREED** unanimously to approve the update to plan for I0218.

7 I0270 – CLARIFICATION OF SIP QUALIFICATION REQUIREMENTS

As the Lead Analyst for I0270, CF provided an overview of the Issue.

CF informed Members that REC Schedule 1 – *Interpretations and Definitions*, REC Schedule 14 – *Metering Operations* and REC Schedule 15 – *Metering Accreditation* all note that to qualify as a Safe Isolation Provider (SIP), the Party needs to be a qualified Meter Operator Agent (MOA). CF stated it has since been determined that qualified Electricity Meter Operatives (EMOs) should also be able to qualify as SIPs.

CF explained that requiring SIPs to be fully qualified MOAs may be hindering smaller Parties who wish to be SIPs from qualifying under the REC. CF mentioned this may be reducing the number of qualified SIPs in the market for Consumers to choose from, or causing them inadvertently to contract with people who are not qualified SIPs to carry out SIP work. CF highlighted the proposed solution is to make amendments to the REC Schedules to allow EMOs to qualify as SIPs.

CF confirmed I0270 will be a Self-Governance Non-Urgent Issue, with the Metering Expert Panel (MEP) assigned as the Responsible Committee. CF explained this has a high priority status due to its impact on Legal and Regulatory Compliance, due to there currently being EMOs who are qualified as SIPs, which is not allowed by the Code. CF noted the Code Manager is proposing I0270 move straight to Consultation, as there should be minimal impact to Parties. CF stated that the Distribution Connection and Use of

System Agreement (DCUSA) are impacted by this Change Proposal and are aware the REC was aiming for a February 2026 Release.

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

Milestone	Activity	From	To
Definition		**16 Sept 2025**	**30 Nov 2025**
	Code Manager Initial Assessment	September 2025	September 2025
	Solution Development	October 2025	November 2025
	Legal Review	November 2025	November 2025
Change Proposal		**01 Dec 2025**	**10 Feb 2026**
	Business Case Assessment	December 2025	December 2025
	Consultation	December 2025	January 2026
	Solution Refinement	January 2026	February 2026
	Final Determination	February 2026	February 2026
Voting		**11 Feb 2026**	**11 Feb 2026**
	Appeal Window	12 Feb 2026	26 Feb 2026

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve the Change Path; and
- **AGREED** unanimously to approve the Proposal Plan for I0270.

8 I0274 – GAS PRESSURE AND CAPACITY INFORMATION TRANSPARENCY

TL informed Members that for some Energy Suppliers, Meter Asset Managers (MAMs) and Consumers, retrieving pressure and capacity information via the Gas Transporter 1 (GT1) process can be time consuming, especially when it is required as part of the new connections process. TL stated this has a negative impact on customers waiting on site work. TL confirmed the Proposer is seeking to make pressure and capacity information available on the GES to allow for the data to be obtained more efficiently.

TL stated I0274 will be a Self-Governance Non-Urgent Issue, with the Change Panel assigned as the Responsible Committee. TL explained that the Code Manager is looking to analyse and develop the solution between now and February 2026. TL mentioned during this time, the required legal drafting changes to the REC, as well as any changes that may be required under the Uniform Network Code (UNC) and/or the Independent Gas Transporters Uniform Network Code (IGT UNC) will be developed. TL highlighted as it is currently not known whether there is an impact on the UNC and/or IGT UNC, the Code Manager is only proposing timescales for Solution Analysis and Solution Development.

AT commented that some aspects of I0274 sound time consuming, and from their experience, the volumes were low. AT stated it is worth a discussion around whether this information needs to be found on the GES, but it did not appear to be a significant issue for Parties under the REC.

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

Milestone	Activity	From	To

Definition		03 Nov 2025	28 Feb 2026
	Solution Analysis	November 2025	January 2026
	Solution Development	January 2026	February 2026

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to approve the Issue Pathway; and
- **AGREED** unanimously to approve the Proposal Plan for I0274.

9 CHANGE PROPOSAL TRACKER

HL provided Members with an update on the Change Tracker.

HL provided an overview of the new submissions:

- I0292 – *Obligate Energy Suppliers to Provide Photo Evidence of Theft to Network Parties*: This issue was accepted in by the Code Manager on 14 November 2025. This was originally submitted as an alternate to I0253 – *Theft DNO/Networks not Providing Photos;* however, the Code Manager considered it was not trying to resolve the same problem statement of "Where a Network Party attends a site where Energy Theft has taken place, the Metering Asset may have been tampered with, and will therefore be unsafe. The Network Party in the process of making the Metering Asset safe, will by necessarily resolve any tampering. The removal of evidence of tampering is an issue for Energy Suppliers, who need this evidence to make claims under the Theft Detection Incentive Scheme (TDIS)". I0292 has instead been accepted in as its own issue, rather than an alternate to I0253.

HL provided an overview of further updates:

- R0207 – *Import/Export MOA Charing Clarification*: On 30 May 2025, the Authority published its decision to send back R0207. A working group was set up to address the issues in the send back letter. An alternative solution was developed to address the problem statement; and
    - Address the risk of unfair/uncompetitive charging arrangements for linked Export Suppliers;
    - Allow MEMs to recover its reasonable costs of delivering its services;
    - Promote competition in the supply of metering services;
    - Protect the interest of Consumers; and
    - If required, be measurable and enforceable under the REC.

The Party Impact Assessment is open and will close on 06 December 2025.

I0228 – *ECOES API for Export Meter Point Administration Number (MPAN) Creation at Scale*: This issue was withdrawn by Octopus Energy on 30 October 2025 and adopted by British Gas on 05 November 2025. The Code Manager has diarised a meeting with British Gas as the new Proposer to discuss potential solution options.

R0271 – *Clarification of Automated Service Providers (ASPs), Approved Meter Installers (AMIs) and EMO Accession Requirements*: on 12 November 2025, Metering Expert Panel (MEP) approved this Change Proposal for implementation on 27 February 2026.

- R0283 – *Annual Address Management Plan Updates*: The Consultation closed on 14 November 2025 and the Code Manager was in the process of reviewing responses. The Change Report (Final Recommendation) will be published in the coming weeks. This Change Proposal will be taken to RECCP for final vote on 16 December 2025.
- I0287 – *Clarification and Amendments to Annulment Definition in REC Schedule 23 – Registration Services - Alignment with Standard License Condition (SLC) Obligations*: The proposed solution for this Issue had now been uploaded to the REC Portal and was available for review. The Change Report (Proposal Plan and Consultation) would be taken to RECCP on 02 December 2025. This Issue would also be discussed at the Change Issues Group (CHIG) on 04 December 2025 and, subject to Panel's approval, the Consultation would open on 05 December 2025.

10 ANY OTHER BUSINESS

PR stated there was a Supplier seat vacant on the MEP, which had not been filled following two nomination periods over the summer. PR advised that another nomination window would be opened shortly, and asked Members to consider possible candidates for nomination.

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