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_25_1202**
DATE	**02 December 2025, 13:00**
LOCATION	**By teleconference**

Attendee	Representing	Initials	Role
Lindsay Biginton	Retail Energy Code Company	LB	Chair
Ben Atkinson	Domestic Suppliers	BAT	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
Dovile Kvedyte-Corrigan	Authority	DKC	Observer
Komal Brown	Scottish Power	KB	Observer
Bela Ashworth	Code Manager	BA	Change Analyst
Harriet Truss	Code Manager	HT	Change Analyst
Holly Law	Code Manager	HL	Change Delivery Manager
Paul Rocke	Code Manager	PR	Head of Communications
Paul Witton-Dauris	Code Manager	PWD	Head of Change
James Rees	Code Manager	JR	Secretariat

1 INTRODUCTIONS

The Chair welcomed attendees to the meeting of the REC Change Panel (RECCP). The Chair stated apologies had been received from Harry Hailwood. Furthermore, Komal Brown will be attending, to specifically discuss agenda item 4, as they raised the alternate change proposal R0287A, and will be able to contribute to the discussion.

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 start of the meeting, with another item being raised at the end of the meeting.

3 APPROVAL OF PREVIOUS MINUTES

JR advised that a comment had been raised on the minutes from the previous meeting. The comment was on the Change Proposal Tracker item, specifically related to R0207. The minutes stated' the Party Impact Assessment (PIA) is open and closed on 06 December 2025'. The minutes should have stated 'The PIA is open and will close on 06 December 2025. JR confirmed this update will be made, with the approved minutes being published as 'final' and made available via the REC Portal no later than 03 December 2025.

4 I0287/A – CLARIFICATION AND AMENDMENTS TO ANNULMENT DEFINITION IN SCHEDULE 23 – ALIGNMENT WITH SLC OBLIGATIONS AND ALTERNATE

As the Lead Analyst for I0287/A, BA provided an overview of the Issue.

BA informed Members that the current wording for the Annulment definition in REC Schedule 23 does not sufficiently align with the obligations set out in the Standard Licence Condition (SLC) 14.2 (d), 14,4 (c) and 14.10. BA highlighted that REC Schedule 23, paragraph 10 outlines the Annulment process. BA advised this Issue is seeking further amendments and clearer guidance to ensure the definition within the REC fully aligns with the SLC's.

BA stated the impact of this Issue includes inconsistent interpretations of the usage of the Annulment process and misalignment between the Code and the SLCs. BA mentioned this could also cause customer confusion, as the lack of clarity sends mixed messages about switching protections and processes. BA highlighted this Issue has been given a high priority score, due to the high Consumer impact.

BA provided an overview of the proposed solution for I0287. BA advised the definitions of Annulled and Annulment Request will be amended in REC Schedule 1, to align with the definitions within the SLC 14. It will be clarified that the Request is to be used by a Losing Supplier, where the Consumer has informed the Losing Supplier that they have not entered into an Energy Contract with the proposed Gaining Supplier, and asks the losing Supplier to prevent the Switch from taking place. BA then outlined proposed amendments to REC Schedule 23, which will be updated to include reference to SLC 14 and replicate the SLC's wording to ensure full alignment between the two texts. This will avoid misinterpretation over the definition of Annulment and the use of the Annulment process. The clearer legal drafting will also improve operational efficiency, reduce ambiguity in the obligations of REC Parties and align processes across industry.

BA then provided an overview of the proposed solution for the alternate change proposal, R0287A. Similarly to I0287, the proposed solution is to amend the definitions of Annulled and Annulment Request in Schedule 1, as well as the Annulment process outlined in Schedule 23. REC Schedule 23 will be updated to include two scenarios that would allow for an Annulment Request to be raised:

- 1) Where the Consumer has not entered into a contract with the gaining Supplier and asks the losing Supplier to prevent the Proposed Supplier Transfer from taking place; or
- 2) The Consumer does not wish the Supplier transfer to take place and requests that the losing Supplier informs the gaining Supplier on their behalf.

BA informed Members that this proposed solution introduces new wording to the REC that would not result in alignment of the code with SLC 14. However, this will widen the scope of the Annulment process to allow the Losing Supplier to prevent a Switch from progressing, if the Consumer notifies them that they have changed their mind and no longer wish the Switch to progress. The floor was then open to questions and comments from the Panel.

KF raised that given the alternate proposal does not match the text of the SLC, why was this solution proposed. KF wanted to understand the logic and justification behind putting forward a solution that diverges from the regulatory text. As the proposer of the alternate change, KB acknowledged that the alternate proposal does not align exactly with the SLC as written, however argued that it is still compliant with the broader intent of the SLCs, particularly referencing both SLC14 - Customer Transfer Blocking and 14A Customer Transfer.

KB emphasised the customer journey, in the context of Faster Switching, customers should be able to change their mind within the 14-day cooling off period and notify either the Gaining or Losing Supplier to halt a Switch. KB suggested that the alternate proposal would facilitate a better customer experience, allowing either Supplier to act on the customer's behalf, rather than restricting action to the losing Supplier only. KB stressed that the proposal is about improving outcomes for customers and ensuring the process is practical in real-world scenarios, not just technically compliant.

The Chair asked for further clarity on whether Ofgem believed the alternate proposal would align with the SLCs, and what Ofgem's likely determination would be. BA confirmed that Ofgem had been engaged with and had reviewed the change report, as well as both proposed solutions. BA highlighted that Ofgem agreed the original proposal better follows the intent of the Annulment process as outlined in the SLCs, but no decision had been made as both proposals need to go through the formal change process before a final determination can be made.

BAT added while they agree with the alternate proposal points about improving the customer journey, they felt the original proposal was 'cleaner' and more straightforward in terms of regulatory alignment. BAT suggested that the alternate proposal's broader scope could be explored further as a separate Issue, rather than as an addition to the current change, to ensure clarity and avoid confusion.

KB emphasised that misuse of the Annulment process should be addressed by ensuring Suppliers only act with clear customer consent. KB noted the alternate proposal includes safeguards requiring evidence of customer instruction, aiming to prevent Suppliers from annulling requests without proper authorisation.

BA then provided an overview of the benefits and costs for I0287 and R0287A. BA highlighted there are no central system costs associated with either Change Proposal.

BA explained that the cost-benefit assessment identified three benefits; improving clarity on the Annulment process, ensuring a positive Switching process for Consumers, and full alignment of the Annulment definition within the REC and the relevant SLCs. The implementation of I0287 would provide clarity on processes and Party obligations surrounding the Annulment process, in accordance with SLC 14. BA highlighted I0287 will also remove opportunities for further misinterpretation, prevent retention-based misuse and ensure regulatory compliance. BA noted this benefit does not apply to R0287A, as the proposed legal text changes would introduce new wording that would change the Annulment process. I0287 would also ensure a more positive Switching process for Consumers by providing clear requirements for submitting an Annulment Request and the obligations of the Losing Supplier. This would uphold Consumer trust in the Switching process and their Supplier. Conversely, the implementation of R0287A may also have a positive impact on the process, by allowing the Losing Supplier to act on the Consumer's request and with their informed consent, and prevent a Switch from progressing post-Switch initiation. However, implementation of R0287A would be in direct conflict with SLC14, which governs the Annulment process, and may lead to Consumer confusion around the Switching process. Finally,

implementation of I0287 would achieve full alignment with the SLCs by replicating the wording of SLC 14.2 (d), 14,4 (c) and 14.10 within REC Schedule 23. This would ensure consistent terminology and process expectations across both documents. The implementation of R0287A would introduce new wording into the REC around the Annulment process that would conflict with SLC 14.

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

Milestone	Activity	From	To
Definition		**20 Oct-25**	**06 Dec-25**
	Solution Development	October	November
	Legal Review	October	November
	Business Case Assessment	November	December
	Change Issues Group	December	December
Change Proposal		**07 Dec-25**	**19 Jan-26**
	Consultation	December	January
	Final Determination	January	January
Voting		**20 Jan-26**	**20 Jan-26**
	Issue for Authority Determination	21 January	21 January

The floor was then opened for any further comments on the Change Proposal and/or the alternate before a vote. KF raised concerns around how the Panel would resolve the difference between the two proposals, and ensure sufficient responses to the Consultation, given the importance of industry feedback. Panel members discussed strategies for driving engagement, such as using forums, extending the Consultation period, and reaching out directly to Parties who had not responded.

HL confirmed that if the alternate proposal is rejected, the process for customers changing their mind within the cooling off period would be revisited as a separate issue. HL reassured Panel that controversial changes tend to attract more Consultation responses, and mechanisms are in place to encourage feedback if initial volumes are low.

RECCP Members noted the content of the Proposal Plan; and

- **AGREED** unanimously to approve the Issue Pathway;
- **AGREED** unanimously to approve the Proposal Plan; and
- **AGREED** unanimously to approve that the Change Report contains sufficient information to proceed to Consultation.

5 CHANGE PROPOSAL TRACKER

HL provided Members with an update on the Change Tracker.

HL provided an overview of the new submissions:

- *R0287A – Clarification and Amendments to Annulment Definition in Schedule 23 – Alignment with SLC Obligations (alternate)* – The Code Manager accepted in this alternate Change Proposal on 26 November 2025 and was discussed under agenda item 4.

- *R0293 – Housekeeping February 2026* – The Code Manager accepted this Change Proposal in on 25 November 2025 and expects to be at the 16 December 2025 Change Panel meeting requesting approval of this Housekeeping change.
- *R0294 – Implementation of IF-051 Data Refresh in EES for BSC CP1607* – The Code Manager accepted this Change Proposal in on 27 November 2025.
- *I0295 – MHHS D0300 Issue* – The Code Manager accepted this Issue in on 27 November 2025.

HL informed Members that on 26 November 2025, the Technical Expert Panel (TEP) approved R0277 – Data Latency SLA Alignment for Gas Enquiry Service for implementation on 27 February 2026, subject to no appeal being raised.

HL provided Members with further updates:

- *R0272 – Enabling Transparency of the CRS Provider's REC Service Level Performance* - This Issue has been progressed to a Change Proposal on 01 December 2025. The draft legal text is available on the REC portal.
- *R0280 – CSS Certificate Authority Audit Clarification* – The Consultation for this change has now closed and will go to the Performance Assurance Board (PAB) for final vote on 16 December 2025.
- *R0283 – Annual Address Management Plan Updates* – The Consultation for this change has now closed. The Code Manager is currently reviewing responses and preparing for the Change Report (Final Recommendation), which will taken to Change Pabel on 16 December 2025 for a final vote.
- *I0289 – Rationalisation of Reports Produced by CSS – CRS Improvements Project* – The Code Manager will issue an Information Request from 05 December 2025 – 05 January 2026, to gather views from Energy Suppliers. The Change Report (Proposal Plan) will be presented to Change Panel on 20 January 2026.

6 OFGEM UPDATE

DKC stated thar Ofgem have published a statutory consultation on modifications to industry codes to implement the harmonised code modification prioritisation process. This follows Ofgem's decision on the preliminary Strategic Direction Statement (SDS) and governance arrangements for industry codes published in August 2025, when we decided to proceed to this statutory consultation.

DKC highlighted that building on previous industry engagement and publications, this statutory consultation provides opportunity to offer feedback our policy proposals, proposed guidance document, and proposed legal code text changes. This is ahead of Ofgem's intended decision publication in early 2026, subject to the outcome of this consultation. DKC explained that Ofgem believe that their proposals will support industry in dedicating time and resource to focus on higher priority modifications. It will also support the transition towards reformed code governance arrangements and the implementation of the SDS.

Ofgem's publication will explore four key policy areas that underpin the proposed harmonisation prioritisation process:

- Prioritisation process: Ofgem have proposed a new prioritisation process and described how this would apply to different types of modifications.
- Prioritisation criteria and categories: definitions, interpretations and how these should be applied to

prioritisation determinations.

- Prioritisation governance: changes to the governance of prioritisation determinations, including reviews and appeals.
- Policy implementation: how the new policy will interact with existing prioritisation processes.

DKC stated that Members can send any responses to industrycodes@ofgem.gov.uk by 12 January 2026. We aim to publish our decision in early 2026, with implementation of the prioritisation policy planned for Spring 2026, subject to the outcome of this consultation.

LINK: https://www.ofgem.gov.uk/consultation/establishing-harmonised-prioritisation-process-industry-codes…

7 ANY OTHER BUSINESS

7.1 R0294 – IMPLEMENTATION OF IF-051 DATA REFRESH IN EES FOR BSC CP1607

HT informed Members that I0294 was raised on 27 November 2025, as an urgent Change Proposal to implement a new Data Integration Platform (DIP) Market Message, IF-051 'Data Refresh', to the Electricity Enquiry Service (EES). HT advised the IF-051 has been approved for implementation under BSC CP1607 for 26 March 2026. HT stated EES will not be impact assessed as part of BSC CP1607, however a Service Provider Impact Assessment is required under the REC CP.

HT confirmed the plan is to bring a Change Report (Proposal Plan) to Change Pabel on 16 December 2025, as the Impact Assessment (IA) will need to be progressed as soon as possible. HT explained if ready prior to 16 December 2025, the Code Manager would like to trigger the IA ahead of the plan being approved. HT confirmed there is limited risk, as BSC CP1607 has already been approved and C&C have already been engaged with.

HT asked Members to confirm their support for progressing the IA ahead of the Proposal Plan approval, if ready. No comments were raised and Members agreed with this approach from the Code Manager.

7.2 NEW MEMBER APPOINTED ON THE METERING EXPERT PANEL (MEP)

PR stated that following on from the nomination period, a new Supplier representative has been appointed on the Metering Expert Panel, effective immediately.

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