RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	**Consultation**
04	Final Recommendation

CHANGE REPORT

R0266 REC DATA SPECIFICATION CLARIFICATIONS

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	06 November 2026
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Change Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	Medium	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	All REC Parties		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

This issue has been raised to improve the clarity of elements of the Energy Market Data Specification (EMDS) that are ambiguous due to information from the pre-REC Data Transfer Catalogue (DTC) Annex C and gas RGMA Annex B being omitted in the transition to REC.

CODE MANAGER MINDED TO POSITION

The Code Manager recommends that the REC Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 06 November 2026.

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BACKGROUND

1 SUMMARY

Prior to the REC, the Master Registration Agreement (MRA) and Supply Point Administration Agreement (SPAA) had additional mandatory information that sat alongside the Data Transfer Catalogue with additional rules, conditions and examples for populating various Data Flows. These were known as Annex B (gas) and Annex C (electricity).

These did not fully migrate over to the REC or transfer to other industry codes. While many of the conditions and Data Item rules are present in the current EMDS, this Change Proposal is covering all of Annex B and Annex C to determine what did not carry over to the REC or other industry codes, and to add in anything deemed still necessary/relevant.

2 PROBLEM STATEMENT

There may be a lack of clarity for Parties populating Market Messages / Data Flows as not all of the additional rules, conditions and examples from Annex B and Annex C transitioned into the REC (or to another industry code).

3 IMPACTS

REC PARTIES AND SERVICE USERS
All REC Parties

REC DOCUMENTS / PRODUCTS
Data Specification
Schedule 14 – Metering Operations
Schedule 30 - Resolution of Consumer Facing Switching and Billing Issues
Address Population Rules

MHHS
While there is no direct impact to MHHS by this Change Proposal, it will be considered throughout solution development deciding what is necessary for inclusion in the current version of the EMDS or other documentation.

4 CROSS-CODE IMPACTS

This Change Proposal is being discussed and tracked at the Cross Code Steering Group (CCSG). No impacts to the Uniform Network Code (UNC) have been identified.

Some of the proposed changes impact Market Messages with Scenario Variants owned by both the REC and the Balancing and Settlement Code (BSC). The BSC has so far elected not to raise a cross-code change, and changes to BSC owned Scenario Variants will be made under this REC Change Proposal.

Market Messages where all Scenario Variants are owned by the BSC are not in scope of this Change Proposal. The BSC are responsible for making their own checks for these Market Messages for any changes that may be required, or for hosting Annex C on the BSC website, if any required changes have not been made when Annex C stops being hosted on the REC Portal.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**11 Jul 25**	**09 Jan 26**
	Solution Development	July	September
	Change Issues Group update	October	October
	Solution Refinement	October	November
	Party Impact Assessment	October	November
	Business Case Assessment	December	January
Change Proposal		**10 Jan 26**	**06 Apr 26**
	Consultation	January	February
	Final Determination	March	April
Voting		**07 Apr 26**	**07 Apr 26**
	Appeal Window	08 April 26	22 April 26

6 STAKEHOLDER ENGAGEMENT

The Code Manager has utilised both the Metering Expert Panel (MEP) and Technical Expert Panel (TEP) as a critical friend, to answer specific metering and Data Specification questions as they arise. The Code Manager has used and will continue to use the Change Issues Group (CHIG) as required.

7 PRIORITY STATUS AND URGENCY

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PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	0	27	0
	Retail Markets Impact	Innovation and Market Arrangements	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	3	7	20
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		1	9	9
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Cross Code Activity	2	10	20
				Overall Priority Score (rounded)	111

Priority Status	MEDIUM
Change Proposal Type	STANDARD

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SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

Initial analysis was conducted collaboratively between RECCo, REC Technical Services and REC Professional Services to confirm what in Annex B and Annex C was already in the Data Specification or other REC documents, what was no longer required and what needed to be updated. This was all looked at through the lens of MHHS to make sure any guidance was still appropriate, or split by MHHS and Non-MHHS Metering Points where required.

9 PROPOSED SOLUTION

The proposed solution makes changes to:

- Data Specification;
- Schedule 14 – Metering Operations;
- Schedule 30 - Resolution of Consumer Facing Switching and Billing Issues; and
- Address Population Rules.

It also proposes the removal of Annex C from the REC Portal, and the introduction of a new Operational Document. This is proposed to be a new Category 2 Document titled “Rules for the Completion of Electricity Market Messages” and by owned by the Technical Expert Panel.

10 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution (electricity) to R0266 can be found here.

No changes have been made following Party impact assessment.

The legal text changes to deliver the proposed solution (gas) to R0266 can be here.

This has had one update since Party impact assessment, which is the inclusion of the text “*This address group identifies the collection address for the removed Asset”* in the first of two Address groups in the ONJOB Market Message, for Scenario Variants 40016, 40017, 40019 and 40020 only.

The Code Manager was initially unsure which Address Group this text belonged with as the original Annex B text stated “*Level 5 Address group identifies collection address for removed Asset*” and there were level 5 Address groups. Additional research has identified that when this text was written, one of the Address groups was level 5 and the other level 3. Both are level 5 in the current version of the Data Specification.

The Code Manager has put this text against the Address group that was originally level 5.

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PRELIMINARY ASSESSMENT

11 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

11.1 SERVICE PROVIDER IMPACT ASSESSMENTS

No Service Provider impact assessment was required was part of this Change Proposal.

11.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was conducted from 02 October 2025 to 28 November 2025. In total one response was received from a Distribution Network Operator (DNO). The non-confidential responses have been published here.

DISTRIBUTION NETWORK OPERATORS	• The DNO was overall supportive of the Change Proposal, and believed it should be implemented. They confirmed they believed it would add clarity to the Data Specification and population of Market Messages. • The DNO agreed the proposed solution addresses the problem statement, and confirmed they believed the Code Manager has identified and considered all processes and scenarios that may be impacted by this Change Proposal. The DNO also confirmed they believed the solution appropriately accounts for the move to MHHS for both MHHS and non-MHHS Metering Points. • The DNO has no comments on the legal text or Data Specification provided for impact assessment. • The DNO confirmed they would require between one and two months to implement the proposed solution, and that they foresaw their costs as being minimal (less than £10,000).

12 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

12.1 RISKS AND ISSUES

NO.	RISK	NOTES	MITIGATION
R01.R0266	The BSC do not update Market Messages owned by them before Annex C stops being hosted on the REC Portal, leaving outdated references in place.		The BSC will host Annex C on the BSC website if required at the implementation of R0266. This has been discussed at CCSG.

No issues have been identified with this Change Proposal.

12.2 ASSUMPTIONS AND DEPENDENCIES

No assumptions or dependencies have been identified with this Change Proposal.

13 BUSINESS CASE ASSESSMENT

13.1 COSTS

There are no central systems costs associated with the implementation of this Change Proposal.

Costs to Parties are expected to be minimal, which has been validated by the one response to the Party impact assessment.

13.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
INCREASED CLARITY FOR PARTIES WHEN POPULATING MARKET MESSAGES	The implementation of this Change Proposal should see an increase in clarity for Parties when populating Market Messages. The Code Manager expects this should be particularly noticeable for newer entrants to the market, who may not have the experience or access to older copies of documents (like Annex B and Annex C) that may still be being referenced by legacy Parties.
INCREASED COHESION BETWEEN PARTIES	The implementation of this Change Proposal should see a reduction in ambiguity for Parties as the extra guidance available should mean all Parties are interpreting the fields of Market Messages and populating them in the same way. The Code Manager believes this will lead to an increase in cohesion, and the reduction of back-and-forth queries between Parties.

13.3 COST BENEFIT ANALYSIS

As there are no central system costs, minimal Party costs and two intangible benefits associated with this Change Proposal, the Code Manager believes there is a positive case for change.

14 CASE FOR CHANGE

The Code Manager considers there is a positive case for change for implementing this Change Proposal on the basis that the proposed solution:

- Is both viable and implementable, and effectively resolves the problem statement;
- Has no associated central systems costs and minimal associated Party costs;
- Has proportionate effort required for implementation;
- Should provide increased clarity for Parties when populating Market Messages; and
- Should provide increased cohesion between Parties.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Electricity Gas
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link

16 GLOSSARY

TERM	DEFINITION
Balancing and Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
Data Specification	means the document of that name forming part of the Technical Specification.
Review of Gas Metering Arrangements (RGMA)	means the Authority-led project which facilitated competition in metering by unbundling it from monopoly transportation businesses and producing, amongst other things, a baseline of standard processes and data flows.
Uniform Network Code (UNC)	means the Uniform Network Code established under the Gas Transporter Licences.