RETAIL ENERGY CODE

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REC CHANGE PANEL MEETING
MEETING MINUTES

MEETING	**RECCP_26_0602**
DATE	**02 June 2026**
LOCATION	**By teleconference**

Attendee	Representing	Initials	Role
Ann Perry	Retail Energy Code Company	AP	Chair
Ben Atkinson	Domestic Suppliers	BA	Voting Member
Andy Clasper	Gas Transporters	AC	Voting Member
Alex Travell	Distribution Network Operators	AT	Voting Member
Martin Brailsford	Metering Equipment Managers	MB	Voting Member
Sarah Jones	Independent SME	SJ	Voting Member
Seb Eyre	Independent SME	SE	Voting Member
Nadir Hafeez	Authority	NH	Authority Representative
Holly Law	Code Manager	HL	Change Delivery Manager
Caroline Freimuller	Code Manager	CF	Senior Change Lead
Lorna Mallon	Code Manager	LM	Subject Matter Expert
Molly Fraser	Code Manager	MF	REC Technical Services
Harry Firth	Code Manager	HF	Secretariat

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1 INTRODUCTIONS

The Chair welcomed attendees to the meeting of the REC Change Panel (RECCP). There were apologies received from Lindsay Biginton (Chair), Keith Foster (Independent SME) and Faye Brookes-Lewis (Consumers).

2 CONFIRMATION OF AGENDA

The Chair invited any additional items of business for consideration during the meeting. NH added Item 7.1 – Code Reform Update

3 APPROVAL OF PREVIOUS MINUTES

RECCP Members unanimously approved the draft minutes from the previous meeting held on 19 May 2026. The approved minutes would be published as ‘final’ and made available via the REC Portal.

4 R0290 - LEGACY DATA ITEM API SERVICE

As the Lead Analyst for R0290, CF provided an overview of the Change Proposal.

CF explained that explained R0290 looks to introduce a new Application Programming Interface (API) provided by ElectraLink, which REC Parties and Third Party Intermediaries (TPIs) would be able to sign up as a user of at no charge. They added that R0290 was raised by a Market Participant who wishes to introduce a temporary ability to access legacy data items which have been made optional under Market Half-Hourly Settlement (MHHS), as the loss of these items may impact Parties in their ability to carry out and support industry processes. The API would provide the last held value for these Data Items for MHHS Metering Points, including Profile Class, Standard Settlement Configuration (SSC), Time Pattern Regime (TPR), Measurement Class and Meter Timeswitch Code. The API is a temporary solution and is proposed as being in place from 26 June 2026 until 02 July 2027, chosen as the end date as this is the current date for MHHS Milestone M16. If this milestone was delayed, the API would still finish on this date without a further Change Proposal to extend it.

CF advised that a confidential Information Request was run from 16 to 30 January 2026, to identify if this issue was seen solely by the Proposer or if there was an appetite among REC Parties for this to be investigated as a centrally funded system. Based on the responses received, the Code Manager proceeded to investigate the feasibility of such an API with ElectraLink, and the costs associated with it.

CF took Members through the proposed solution. A new REC Schedule, Legacy Data Item API Schedule, would be created, along with changes to Schedules 1 and the Access Agreement in Appendix 1 of Schedule 9. CF mentioned that there had been brief conversations on whether a solution could involve the Electricity Enquiry Service (EES), but EES does not hold any historic information, only current information.

CF set out the case for change, advising that total central system costs have been estimated to be between £512,000-577,000. The cost for ElectraLink supplying the API from 26 June 2026 to 02 July 2027 would be £467,000, £30,000 for REC Technical Services to provide a connector from the API to REC Parties/TPIs, and £15,000-£80,000 for REC Professional Services to process new Access Agreements, the range depending on the number of API Users who do not have existing Access Agreements, which will require processing additional security and data protection protocols. CF advised that these costs do not include any costs to individual Parties, as it is expected internal development will be required to use this API.

CF outlined the expected benefits for R0290. REC Parties and TPIs identified several use cases provided for accessing the last held value for the five Data Items, including identifying multi-rate meters and ensuring the Consumer is on the optimal tariff, ensuring Metering Points are set up correctly after a Reverse Migration, providing quotes for Consumers where these Data Items are still required in Supplier quoting systems, and general portfolio and exception management.

CF advised that the Code Manager does not believe there is a positive case for change. They advised that the problem is not impacting as many MHHS Metering Points as originally thought. It was assumed to be 100% of MHHS Metering Points, but a data extract from 11 March 2026 estimated these Data Items were only missing for ~4% of MHHS Metering Points. A further data extract from mid-May estimated the Data Items were missing for ~2%. In addition, the proposed solution is expensive, accounting for 17-20% of the REC Change budget for 2026-27. The Code Manager does not believe this spend is justified on a temporary solution. Other REC Changes and Issues are looking into whether the specified Data Items are required more permanently, such as I0273 - Sharing of SSC and TPR Information for MHHS Smart and Advanced Meters. The Code Manager also cannot estimate accurately how many Parties may register to be an API User, part of the use case (Reverse Migration) becomes redundant at MHHS Milestone M14 (currently 28 October 2026), and any Party who wishes to receive this data can contract separately with ElectraLink to receive it.

CF advised that five responses were received to the consultation, with three responses supportive of the Code Manager's recommendation to reject this Change Proposal. CF added that one respondent disagreed and supported R0290 being implemented. Another respondent also supported the implementation of R0290 but believes the Code Manager should challenge the costs provided by ElectraLink, however the Code Manager have very little influence over ElectraLink's commercial decisions, especially as they are not a REC Service Provider. CF added that one respondent wanted to see other Data Items included. This has not been explored as it would require further investigation as to whether this is appropriate or possible, including restarting the solution development process, acquiring new costs from ElectraLink and a second consultation. All of this would take time, which the Code Manager believes would further negatively impact the business case by reducing the amount of time the API would be live.

CF advised that in response to the Final Change Report for R0290, the Code Manager had received a letter from the Energy Consultant Association (ECA), a trade association representing TPIs. CF confirmed that Panel members had been provided a copy of the full letter and presented the Code Manager responses to the main points and themes.

The ECA expressed concern that they were not made directly aware of R0290, considering that TPIs were identified as an impacted stakeholder, and the fact that none of the consultation respondents represent Non-Domestic Consumers or TPIs. The Code Manager responded that all REC consultations are publicly available for anyone to respond to. The R0290 solution and consultation was also discussed at the May Change Issues Group meeting, which the ECA regularly attend. The consultation was also advertised in the REC Change Bulletin and Code Manager LinkedIn Page as normal. CF added that the Code Manager were also disappointed that no TPI responded to the consultation as an impacted stakeholder but added that they are unable to directly contact every Party when consultations open for Change Proposals that may affect them.

The ECA suggested that these Data Items are not merely optional and are required for Non-Domestic Consumer billing. They added that it is particularly important for TPIs and brokers who carry out historic contract and billing reviews for Non-Domestic customers. The Code Manager responded that R0290 is not removing these Data Items, they were already optional and were consulted on as part of MHHS in 2021-22. Also, the proposed API would only hold the last held value of the Data Item, so would not provide a lot of historical information and would not be an appropriate solution for any historical reviews.

The ECA suggested that the proposal to only provide the last held value for these Data Items until MHHS Milestone M16 is not sufficient. The Code Manager responded that they would welcome the ECA to raise a Change Proposal on a permanent solution, noting that this may involve changes being raised to other Codes as not all of the Data Items are REC governed, or get more involved with other Issues such as I0273 which are looking into potential permanent solutions for some of the Data Items. Also, including more than the last held value has never been within the scope for R0290.

The ECA expressed concern that access to these Data Items should not depend on a private commercial arrangement with ElectraLink, noting that this approach risks creating an imbalance between large and small Market Participants. The Code Manager highlighted this to Members prior to the final vote, requesting they consider this point and reminding members that small TPIs can be much smaller than other market participants (e.g. a single person organisation).

The ECA asked RECCo how it intends to ensure the Data Items remain preserved and accessible after MHHS migration. The Code Manager responded that it would not be appropriate for themselves to raise such a Change Proposal, as it needs to be driven by an organisation that is directly impacted. They would be happy to support a potential Proposer through the REC Change process, as normal, including acting as a critical friend prior to the raising of the Change Proposal. CF added that of the Data Items the ECA have listed, only SSC and TPR are under REC governance, so other Code changes would be required. Regarding post-M16, newly introduced MHHS items such as Market Segment and Connection

Type can be used to identify much of the information some of the Data Items would have historically used for.

NH sought clarification on whether the defect relates to difficulties in accessing existing data and whether the proposal is simply intended to automate access via ElectraLink, or whether there are broader access barriers affecting users. CF explained that, at the time the Change Proposal was raised, it was assumed that 100% of MHHS-migrated meters would have blank Data Items, creating a widespread issue. On that basis, a centralised API solution was considered proportionate to avoid multiple parties establishing individual contracts with ElectraLink. However, as the Change Proposal progressed, it became evident that the issue is much more limited in scope, affecting only a small proportion of MHHS Metering Points (circa 2%), rather than all meters, as the Data Items only become blank if they are manually overridden. The cost of the centralised API solution was also higher than expected. For those limited cases, Parties can instead procure access directly from ElectraLink if required with one Party confirming at consultation they would not use the API as they have already procured the data from such a direct contract.

HH noted the lack of response from TPIs to the consultation and asked if it was worth issuing a second consultation, to potentially gain more understanding of the value of the solution. CF responded that if a second consultation was issued and provided sufficient evidence to change the recommendation, R0290 could not be implemented in time for the June REC release, reducing the time that the temporary solution would be in place from a year to approximately nine/ten months (assuming it could be implemented in an extraordinary release), negatively impacting the business case. They added that five consultation responses is not a low amount compared to other recent REC Change Proposals. HH responded that it may be difficult for TPIs to track Changes given resourcing restraints for some of the smaller TPIs, and it would be useful to have their view as one of the more impacted stakeholders. CF responded that a previous REC Change Proposal directly impacting TPIs received around 10 consultation responses from TPIs, and considering there are an estimated 3000 TPIs, a similar level of response would not be necessarily representative of the sector.

LM added that there have been several opportunities for TPIs to engage with R0290 and have not done so. They advised that TPIs already have access to the current values of these Data Items in EES, except for TPR, which TPIs have never had access to. SJ added that having read the whole ECA letter, the main concern is a wider issue on accessing these Data Items, rather than wanting R0290 to be implemented. SJ also confirmed they did not believe that implementing R0290 would resolve the issues as stated by the ECA. They suggested that the ECA's main purpose was for RECCo and other Codes to engage with TPIs further on these Data Items. CF agreed with this view, pointing out that some of the ECA's arguments and suggestions were never in the scope for R0290. Lastly, SJ requested that RECCo or the Code Manager engage with the ECA on the new Data Items available under MHHS, to make sure they're aware of the data available now that may help resolve their issues.

SE raised the question of whether the response letter should address the level of stakeholder engagement, noting that the ECA had opportunities to engage throughout the process but only responded at a late stage. They highlighted the need to balance acknowledging this without appearing inflammatory, while still upholding the transparency and integrity of established processes.

CF confirmed that this point would be addressed, as the ECA would receive both a copy of the Code Manager responses presented to the Change Panel and also a formal written response from RECCo. They explained that the response would remind the ECA of the various established engagement channels available to them, including attendance at the Change Issues Group, access to published agendas and papers, and subscription to change bulletins and consultations. They added that the Code Manager would offer to verify whether the ECA is appropriately signed up to these communications and explore whether any additional, scalable methods of improving visibility are required. However, they emphasised that it would not be appropriate to provide targeted or preferential notifications to specific Parties, as this would not be feasible or equitable across the wider stakeholder base. CF also confirmed

the Code Manager would offer to help the ECA as a critical friend raise in the raising of any new Issue or Change Proposal to explore the problems they highlighted within the letter.

RECCP Members noted the contents of the Change Report; and

- **AGREED** unanimously to reject the proposed solution;
- **AGREED** unanimously to reject the proposed implementation date of 26 June 2026; and
- **AGREED** unanimously to reject the proposed implementation approach of Big Bang.

5 IMPLEMENTATION OF OFGEM-LED CODE MODIFICATION PRIORITISATION WITHIN THE REC

HL advised that on 29 May 2026, the harmonised code modification prioritisation framework was implemented within the REC. Whilst the REC already operated a relatively mature and detailed prioritisation approach through its existing Prioritisation Matrix arrangements, the implementation of the harmonised framework aligns the REC with a standardised cross-code methodology and governance approach being introduced across all industry codes.

As part of the work undertaken to prepare for the harmonisation framework, every live Change Proposal and Issue has been given a prioritisation category of high or standard by the Code Manager, assessed against three equally rated criteria; alignment with the Strategic Direction Statement (SDS), complexity and importance.

A full list of all live Change Proposals and their prioritisation category was published with the meeting papers for REC Change Panel previously. HL noted that the assessment and implementation activity has not identified any material impacts to existing approved Change Plans, implementation timelines or ongoing delivery activities. The introduction of the harmonised framework is therefore not expected to result in substantive operational changes to the progression of current REC Change Proposals and Issues.

RECCP Members noted the contents of the Change Panel paper; and

- **AGREED** unanimously to approve the prioritisation categories (Standard or High) for all live Issues and Change Proposals

6 CHANGE PROPOSAL TRACKER

HL provided Members with an update on the Change Tracker.

HL advised that four new submissions have been accepted in by the Code Manager since the last Change Panel meeting:

- I0327 - Provision of Standard industrial Classification (SIC) Code to REC Parties
- R0328 - Removal of D0383 & D0384 requirements from Sharing MTDs process
- I0329 - A review of the Misdirected Payments and Debt Assignment
- R0330 - Use of REL Data by The Authority

HL provided an overview of further updates:

- I0200 - Review of the REC's Address Management Service: The first working group meeting for I0200 will take place on 11 June 2026 (10:00 – 12:00). The pre-meeting agenda and papers will be published on 04 June 2026. To register your interest and sign up to the working group, please contact us at change.management@recmanager.co.uk.

- R0261 - Addition of Export flag in D0303 flows: On 27 May 2026, the Technical Expert Panel voted to approve R0261 for implementation. Subject to no appeal being raised, this will be implemented on 06 November 2026.
- R0317 - Number of Displayed Register Digits Data Item linkage: On 27 May 2026, the Technical Expert Panel voted to approve R0317 for implementation. Subject to no appeal being raised, this will be implemented on 06 November 2026.

7 ANY OTHER BUSINESS

7.1 CODE REFORM UPDATE

NH provided an update on Ofgem's ongoing Code Reform programme:

Ofgem sought expressions of interest from any Parties interested in becoming a Code Manager candidate for the Consolidated Electricity Commercial Code and Gas Network Code in January.

After consideration, Ofgem have decided to consider RECCo for selection on a non-competitive basis for the Consolidated Electricity Commercial Code, and to consider Xoserve in partnership with Encodar and Talan for selection on a non-competitive basis for the Gas Network Code.

Both candidates have now been invited to submit licencing assessment forms for the relevant Codes. Ofgem will then consider this information and publish a notice stating whether they propose to grant them a Code Manager license, which will be subject to stakeholder representations.

Ofgem also welcome the commitment of all incumbent Code Administrators supporting a successful phase two transition. Ofgem's experience with phase one of energy code reform has demonstrated that the expertise and operational insight of these organisations and their respective panels will be critical to delivering a smooth and orderly transition. Ofgem will update in due course on their anticipated time scale for these key activities.

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