RETAIL ENERGY CODE

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REC CHANGE PANEL MEETING
MEETING MINUTES

MEETING	**RECCP_26_0818**
DATE	**18 August 2026**
LOCATION	**By teleconference**

Attendee	Representing	Initials	Role
Lindsay Biginton	Retail Energy Code Company	LB	Chair
Komal Brown	Domestic Suppliers	KB	Voting Member
Harry Hailwood	Non-Domestic Suppliers	HH	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
Alice Williams	Consumers	AW	Voting Member
Sarah Jones	Independent SME	SJ	Voting Member
Keith Foster	Independent SME	KF	Voting Member
Seb Eyre	Independent SME	SE	Voting Member
Bela Ashworth	Code Manager	BA	Change Delivery Manager
Florentina Monea	Code Manager	FM	Change Lead
Caroline Freimuller	Code Manager	CF	Subject Matter Expert
Lorna Mallon	Code Manager	LM	Subject Matter Expert
Ann Perry	Retail Energy Code Company	AP	Observer
Poppy Mullins	Code Manager	PM	Change Lead
Ian Chalfon	Code Manager	IC	Change Lead
Shaheeni Vekaria	Metering Equipment Managers	SV	Observer
Nadir Hafeez	Ofgem	NH	Authority Representative
Harry Firth	Code Manager	HF	Secretariat

1 INTRODUCTIONS

The Chair welcomed attendees to the meeting of the REC Change Panel (RECCP). There were apologies received from Jess Collins (Consumers). It was noted that Alice Williams would be acting as the alternate for Jess Collins.

2 CONFIRMATION OF AGENDA

The Chair invited any additional items of business for consideration during the meeting. NH added item 9 – Energy Code Reform Update.

3 APPROVAL OF PREVIOUS MINUTES

RECCP Members unanimously approved the draft minutes from the previous meeting held on 04 August 2026. The approved minutes would be published as 'final' and made available via the REC Portal.

4 R0321 - DNOS CREATE EXPORT MPANS AFTER APPROVING G98/99 COMMISSIONING DOCUMENTS

As the Lead Analyst for R0321, CF provided an overview of the Change Proposal.

CF explained that R0321 seeks to remove Electricity Suppliers from the process of creating Export Meter Point Administration Numbers (MPANs) for new generation installations and instead require Distribution Network Operators (DNOs) to create export MPANs directly when they approve G98 or G99 commissioning documentation. The proposal is intended to address inefficiencies in the current process, particularly for large housing developments where thousands of export MPANs may need to be created. Under existing arrangements, Suppliers often act as an intermediary between Consumers and DNOs, creating delays and administrative burdens, negatively impacting Consumers and the journey to Net Zero.

CF presented the replanned milestones within the proposed Update to Plan for R0321. The Proposal Plan originally scheduled a consultation to be issued in July ahead of a final Change Panel decision in September 2026. However, the consultation was delayed while the solution was reassessed for any Performance Assurance implications as part of the ongoing transition between Performance Assurance providers. CF requested approval to move the final voting milestone from 15 September to 20 October 2026 to allow sufficient time to review consultation responses and prepare the final report. CF advised that the next steps would be to go out for consultation for a standard three-week period, subject to Change Panel approval, and also update the Change Issues Group on the solution updates in September.

Milestone	Activity	From	To		
Change Proposal		**26 Mar 26**	**14 Sep 26**	**26 Mar 26**	**19 Oct 26**
	Code Manager initial assessment	March	April	Completed	Completed
	Party impact assessment	May	June	Completed	Completed
	Solution refinement	June	July	Completed	Completed
	Business Case Assessment	June	July	Completed	Completed
	Consultation	July	August	August	September
	Final Determination	August	September	September	October
Voting		**15 Sep 26**	**15 Sep 26**	**20 Oct 26**	**20 Oct 26**
	Appeal Window	16 Sep 26	30 Sep 26	21 Oct 26	04 Nov 26

RECCP Members noted the Update to Plan and:

- **AGREED** unanimously to approve the Update to Plan

CF went through the proposed solution for R0321 and advised that the solution had been significantly refined since the Change Panel last reviewed it. Feedback from both Change Panel members and DNOs

highlighted concerns that the original proposal lacked a clearly identifiable trigger point and would be difficult to assure. DNOs had highlighted at Party impact assessment there were safety concerns around creating an Export MPAN before the equipment on Site had been commissioned. In response, the solution now specifies that DNOs would create export MPANs within two Working Days of approving the relevant G98 or G99 commissioning documentation. An addition to Schedule 27 has been drafted to include this new trigger point.

A Party impact assessment (PIA) ran between 08 May and 01 June, generating responses from five DNOs and two Electricity Suppliers. Most DNOs initially raised concerns regarding their safety obligations under the Distribution Code. They noted that Export MPANs should not be created before generation equipment has passed the necessary safety and network compliance checks. The Code Manager reached out to all responding DNOs, the Energy Networks Association (ENA) and Independent Networks Association (INA) for assist redrafting the solution, getting responses and significant assistance from two DNOs who responded to the Party IA. The solution was revised to align MPAN creation with approval of commissioning documents. British Gas, as the Proposer, also agreed with the amended solution.

PIA respondents indicated implementation lead times ranging from six to twelve months, largely driven by the need to establish new processes, train staff and update work instructions. The upcoming consultation will specifically seek to validate the Code Manager assumption that the revised solution will not alter previously submitted cost and implementation estimates.

Both Suppliers and DNOs identified benefits from simplifying the customer journey. CF noted that Suppliers are frequently required to obtain G98/G99 documentation from Consumers before forwarding it to DNOs, despite DNOs already holding the documents internally. Removing this intermediary step should reduce administration and improve efficiency.

Several DNOs also highlighted operational benefits. One DNO noted that it frequently receives thousands of individual Export MPAN requests for large housing developments rather than bulk submissions. By creating MPANs directly following commissioning approval, DNOs could manage large-scale developments more efficiently and automate parts of the process. The proposal is also expected to support Net Zero objectives by enabling faster creation of export MPANs and facilitating quicker registration of generation assets capable of exporting electricity to the grid.

CF advised that no direct cross-code impacts have been identified. While PIA respondents referenced potential interactions with the Distribution Use of System Agreement (DCUSA) and the Connection and Use of System Code (CUSC), discussion with the Party identified no specific impacts. The Code manager has discussed this at the Cross-Code Steering Group (CCSG), with no impacts identified. IT has been concluded that as the proposal primarily references an existing Distribution Code process rather than modifying it, there should be no impact to Distribution Code. The REC Code Manager is engaging directly with Distribution Code governance representatives (as they do not attend CCSG) to confirm this position.

One DNO suggested introducing obligations requiring Suppliers to request a Logical Disconnection of unused Export MPANs. CF explained that it is outside the scope of R0321 because the Logical Disconnection process sits entirely within DCUSA governance arrangements.

Some DNOs highlighted concerns regarding Export MPANs that are created but never subsequently registered by Suppliers. CF clarified that the REC already requires Suppliers to register requested Export MPANs within five Working Days. This issue is therefore being treated separately and has been referred to the Performance Assurance team for investigation rather than being addressed through R0321.

Two key assumptions were highlighted. Firstly, the number of Export MPANs requiring subsequent Logical Disconnection will not increase significantly. This assumption is not able to be validated but is considered reasonable by the Code Manager given increasing solar adoption and government policy supporting solar installations on new properties.

Secondly, that the generation installations requiring Export settlement generally result in Export MPAN creation. However, discussions with the BSC confirmed there is currently no requirement to create an Export MPAN where customers do not intend to export electricity under an Export tariff.

CF explained that consultation responses will therefore seek information from DNOs on how many approved G98/G99 installations do not go on to have Export MPANs created. AT noted that this information may be difficult for DNOs to provide because approved commissioning records and MPAN registration data are held within separate systems. Nevertheless, they agreed that obtaining an indicative market view would be useful. CF added the Code Manager assumes the percentage of Consumers who get generation equipment installed but do not register for an Export tariff is small, but this data will help validate that assumption if it is available.

CF advised that no central system costs have been identified. Energy Suppliers forecast no implementation costs, while DNOs estimated costs in the region of £10,000 to £50,000, primarily related to staff training, process development and documentation updates. Expected benefits include reduced administrative burden for Suppliers, support for wider net zero objectives and an improved experience for Consumers.

MB asked whether Independent Network Operators had provided feedback. AT confirmed that GTC had participated in the assessment and was strongly supportive of the proposal. They explained that organisations such as GTC process very large volumes of G98 and G99 applications associated with housebuilders and developers and would benefit significantly from automating Export MPAN creation following commissioning approval.

RECCP Members noted the proposed solution, proposed implementation date of 25 June 2027 and Big Bang approach; and

- **AGREED** unanimously to approve the Change Report contains sufficient information to proceed to consultation.

5 R0292 - OBLIGATE ENERGY SUPPLIERS TO PROVIDE PHOTO EVIDENCE OF THEFT IN CONVEYANCE TO NETWORK PARTIES

As the Lead Analyst for R0292, CF provided an overview of the Change Proposal.

CF advised that R0292 proposes amending Schedule 8 to require Energy Suppliers carrying out Site visits for suspected or actual Theft in Conveyance to take a photograph of the Site upon arrival and provide it to the relevant Network Party, either proactively or upon request. The Proposal mirrors the recently approved R0253 Change Proposal, which introduced the equivalent obligation for DNOs and Gas Transporters (GTs), ensuring that obligations remain aligned between Suppliers and Network Parties.

CF went through the proposed solution. They advised that the proposed legal text has been deliberately drafted to closely replicate that approved under R0253, creating a consistent and balanced approach to the exchange of photographic evidence. Feedback from the August Change Issues Group sought clarification on whether the proposal would mandate additional Theft investigation visits. It was confirmed that this was not the intention, and that the obligation is limited to capturing and sharing photographs during existing visits.

A Party impact assessment received seven responses, comprising four DNOs (one of which was also a Gas Transporter) and three Energy Suppliers. Overall support for the proposal was strong. Energy Suppliers advised that Theft in Conveyance visits occur very infrequently because such cases involve premises without an MPxN. Consequently, Suppliers anticipated minimal operational impact and considered the additional requirement to take and share photographs proportionate.

Several suggested amendments were considered but not progressed. One party proposed removing references to sketches as an alternative form of evidence where a photograph cannot be obtained. This was not taken forward because sketches remain explicitly recognised within the REC definition of Confirmed Energy Theft. Amending that requirement would require a broader review of related REC provisions and would need to be progressed through a separate Issue or Change Proposal. The Code Manager has reviewed whether it was possible for this to be looked at under I0187, but it had also been descoped from this Issue it is limited to looking at Schedule 8, whereas this would likely also require changes to Schedule 1. Similarly, a proposal to require photographs to be provided proactively in all cases, rather than proactively or on request, was rejected to maintain consistency with the already approved wording under R0253. Parties wishing to pursue this amendment have been advised by the Code Manager to raise a future Change Proposal that addresses both reciprocal obligations together.

Questions were also raised regarding the use of the Secure Data Exchange Platform (SDEP) for the sharing of photographs, as GTs currently do not have access to the platform. CF explained that this issue already exists under R0253 and therefore is not unique to R0292. A separate REC Change Proposal, R0162, is already progressing to provide GT access to SDEP and is expected to resolve this issue in due course. In the meantime, Suppliers and GTs will need to agree alternative bilateral arrangements for exchanging photographs.

No central systems costs are anticipated as the Proposal consists solely of legal text changes. Four respondents indicated that they expected no implementation costs, while two DNOs estimated costs of less than £10,000. Overall, implementation costs were assessed as minimal.

The key benefits identified were improved evidence gathering for theft in conveyance investigations and better visibility of Site conditions before any remedial work is undertaken. Network Parties would have stronger evidence to support case files and could make more informed decisions when planning their own visits, potentially reducing failed visits by ensuring appropriate resources, personnel and equipment are deployed from the outset.

CF advised that subject to approval, R0292 will proceed to a standard 15-Working-Day consultation. Although the current timetable indicates a final Change Panel decision by 01 December, the REC Code Manager is aiming to accelerate delivery and bring the proposal back to Panel before the end of November, to ensure it is approved ahead of the new REC Governance arrangements being implemented from December.

RECCP Members noted the proposed solution, proposed implementation date of 26 February 2027 and Big Bang approach; and

- **AGREED** unanimously to approve the Change Report contains sufficient information to proceed to consultation

6 R0322 - ERRONEOUS SWITCH REVIEW: I0237 CLARIFICATIONS

As the Lead Analyst for R0322, FM provided an overview of the Change Proposal.

FM explained that R0322 has been developed following work undertaken by the Erroneous Switch (ES) working group under I0237. The proposal seeks to resolve a number of inconsistencies, drafting errors and terminology issues identified within Schedule 30, associated Market Messages and related Data Items. The overall objective is to improve clarity, consistency and transparency within the ES process while aligning terminology across the REC.

FM went through the proposed solution, which is split across five key areas. Firstly, amendments are being made to Schedule 30 to standardise terminology, including replacing references to “Customer” with “Consumer” and “Transfer” with “Switch”. A new table of ES reason codes will be added for transparency and ease of reference, although no new reason codes are being introduced. Amendments were also

proposed to paragraph 5.3 concerning the handling of data collected during an ES period. Following feedback received on the legal drafting, the proposal will now retain the requirement for Suppliers to delete any data collected during the ES period, alongside taking reasonable steps to cease data collection once a potential ES has been identified, whilst complying with relevant legal obligations.

Changes are also proposed to the ES flag Data Item to clarify that the flag should only be used at the final stage of the ES process and to reduce ambiguity regarding its permitted values. While the existing data element has a physical length of one character, its values are currently represented as “TRUE” and “FALSE”. The proposal is therefore to align the enumeration values with the existing field length by using “T” and “F”. FM noted that comments had subsequently been received on this aspect and further clarification will be undertaken before consultation.

The proposed solution also includes amendments to align terminology with Schedule 30 and Electricity arrangements. These include a correction of an incorrect Schedule 10 reference to Schedule 30, and amendments to Supplier terminology. Following review of the legal drafting, references to “Old” and “New” Supplier will be removed. Changes are also proposed to ES reason code descriptions to align them with equivalent electricity descriptions, although the underlying values remain unchanged.

For electricity Data Items within D0301, similar terminology corrections are proposed, together with alignment of ES reason code descriptions with gas arrangements. Again, no underlying code values are changing. In addition, the solution incorporates a correction to the Status Response RET Data Item description, amending the permitted ES period from “four months” to “24 months” to reflect the existing process. This amendment was originally within R0313 but has been transferred into R0322 to enable a timelier implementation.

Following publication of the legal drafting, several comments were received from stakeholders. As a result, amendments will be made to reintroduce the requirement to delete collected data within Schedule 30, replace proposed “Old” and “New” Supplier references with “Losing” and “Gaining” Supplier terminology, clarify that ES flag changes are limited to descriptions and enumerations rather than data type changes, and confirm that amendments to certain Data Items will affect only descriptions rather than Data Item titles in order to avoid system impacts.

SJ queried whether only some Customer-related Data Item names would be changed to Consumer-related terminology while others would remain unchanged. FM confirmed that, for certain Data Items where wider system impacts could result, only the descriptions would be updated, while the existing Data Item names would remain unchanged. LM explained that this approach was adopted to minimise the scope of changes and avoid creating impacts across a much wider set of industry flows. SJ expressed concern that selectively changing some names but not others could introduce inconsistency and suggested that either all names should remain unchanged or the issue should be addressed more comprehensively. LM acknowledged the point and noted that views could be sought through consultation and revisited if stakeholders expressed strong concerns.

SJ also questioned the proposed amendment of the ES Flag values from “true/false” to “T/F”, noting that Central Switching Service (CSS) documentation currently references Boolean values of “TRUE” and “FALSE”. They raised concerns that introducing the Change could create further inconsistencies with other documentation. LM confirmed that previous checks had been undertaken with the CSS Provider but agreed that the matter should be revisited and clarified. SJ suggested that the ES flag value amendment might be better progressed separately from R0322, given the potential for unintended impacts. LM agreed that, whilst the value format could potentially be removed from scope if necessary, the clarification regarding when the flag should be used was still required and should remain within the proposal.

FM summarised the Party impact assessment, which ran from 26 June to 17 July and received responses from two Energy Suppliers. Both respondents broadly supported the proposed amendments, recognised the associated benefits, and supported inclusion of the 24-month correction within R0322.

One respondent identified a small level of potential system configuration work, estimating costs within the £0 to £9,999 range. Overall support was received for both the solution and proposed implementation approach.

FM advised that the Code Manager had identified low implementation costs and no central system costs. Expected benefits include improvements in clarity, consistency and ultimately the Consumer Switching experience.

FM presented the proposed next steps for R0322, with plans for a standard three-week consultation, subject to approval. Given the additional amendments and clarifications introduced following publication of the legal drafting, they sought Panel views on whether sufficient information was available to proceed directly to consultation, subject to the revised drafting being incorporated, or whether the updated drafting should instead be shared with Panel members and approved through an ex-committee vote before consultation commenced. The intention in either scenario was to minimise delays and allow consultation to commence as soon as practicable.

RECCP Members noted the proposed solution, the proposed implementation date of 06 November 2026 and Big Bang approach; and

- **AGREED** by majority to proceed with a vote during the meeting; and
- **AGREED** by majority to approve the Change to proceed to consultation.

SJ advised that they objected to both a vote during the meeting and R0322 proceeding to consultation. They added that they were not comfortable with the current legal drafting, even with the clarifications provided by the Code Manager during the meeting, referencing their previous comments on the item. There were no other objections to either vote.

SJ sought clarification on whether the version of the legal text for R0322 proceeding to consultation would include the amendments and concerns raised during the meeting, particularly regarding the proposed change to the ES flag values from “TRUE/FALSE” to “T/F”. FM confirmed that the consultation documentation would be updated to reflect the amendments and clarifications discussed during the meeting. LM added that REC would undertake further checks with the CSS Provider to confirm the correct approach. They advised that the amendment would only remain within the consultation if confirmation was obtained that the change was appropriate. If CSS documentation confirmed that the values should remain as “TRUE” and “FALSE”, or if sufficient confirmation could not be obtained, the amendment would be removed from scope. SJ requested that this be captured as a formal action and that the outcome of the CSS review be reported back at the next meeting. FM and LM agreed.

RECCP_26_0818_01 – REC Code Manager to provide update on proposed amendments to R0322 legal text following further discussions with the CSS Service Provider.

Post-meeting note: *The REC Code Manager issued the following statement to Change Panel members on 20 August:*

“Following comments received and discussions at Change Panel on 18 August, the Code Manager has determined that there are still outstanding queries around consistent use of terminology in the Code as part of R0322 - Erroneous Switch Review: I0237 Clarifications and further solution refinement is needed before the Change can be issued for consultation. As such, R0322 will not be issued for consultation on 21 August. Panel members will be updated on further amendments to the legal text prior to its publication”.

DRAFT

7 I0331 - REGULATORY ALLIANCE CREATION REJECTIONS

As the Lead Analyst for I0331, CF provided an overview of the Issue.

CF explained that I0331 seeks to introduce Service Level Agreements (SLAs) on Network Parties to submit Regulatory Alliances to the CSS Provider or to work any rejections received from the CSS Provider. This follows an incident in 2025 where some Network Parties either failed to submit Regulatory Alliances to the CSS in a timely manner or did not promptly action rejection notifications received from the CSS Service Provider. As a result, an Energy Supplier incorrectly believed the required regulatory alliances were in place and attempted to complete Supplier Switches that could not proceed. This led to more than 200 Consumers experiencing delays when Switching to their chosen Supplier.

CF advised that this has been categorised as a non-urgent Self-Governance Issue, with the Change Panel as the Responsible Committee. Identified impacted parties include Energy Suppliers, DNOs and their Electricity Retail Data Agents (ERDAs) and GTs and their Gas Retail Data Agents (GRDAs). A positive Consumer impact is expected, as I0331 is intended to improve the Consumer Switching experience by reducing the likelihood of Switching delays caused by missing or unresolved Regulatory Alliances. Impacts are expected to be confined to the Switching Data Management Schedule. Whilst no impacts are currently expected for the CSS Service Provider, engagement will continue during solution development to confirm this position.

The REC Code Manager believes I0331 should be assigned a Standard Prioritisation Category. The proposal was assessed by the Proposer as having a medium alignment to Ofgem's Strategic Direction Statement, particularly Objective 2.1 relating to Consumer protection and Objective 3 concerning competition and financial resilience. The Code Manager agreed with the assessment of medium and the link to objective 2.1, but disagreed with the link to Objective 3, noting that it is primarily focused on Supplier insolvency and preventing Suppliers of Last Resort (SoLRs).

The proposal was also assessed by the Proposer as being of medium importance because it directly impacts Consumers and market fairness, particularly for new market entrants who are more likely to need new Regulatory Alliances established. This was agreed by the Code Manager but, it was noted that the originating incident affected a relatively limited number of Consumers.

While the Proposer had suggested a low to medium level of complexity, CF advised that the REC Code Manager believed it is likely to sit closer to medium complexity due to the involvement of multiple industry parties and the need for careful stakeholder engagement. A key consideration will be maintaining a tightly controlled scope to avoid creating cross-code impacts. Whilst the process for loading Regulatory Alliances into the CSS sits within the REC, the underlying arrangements governing the establishment and termination of regulatory alliances sit within the Distribution Connection and Use of System (DCUSA) for electricity and the Uniform Network Code (UNC) for gas. The proposal will therefore be monitored closely by the CCSG to ensure that development does not inadvertently stray into areas governed by those Codes.

CF presented the proposed milestones in the Proposal Plan, noting that it only covers a solution development phase running through to the end of October. CF explained that a draft solution is already being developed, but it has not yet determined whether any Performance Assurance requirements will be necessary. If Performance Assurance activity is required, Service Provider Impact Assessments and engagement with the REC Performance Assurance team will be undertaken before progressing further. If no such requirements are identified, the proposal could move directly into Party Impact Assessment. The Code Manager will work with Performance Assurance colleagues over the coming weeks and return to Change Panel by the end of October with an updated plan covering the next stages of development.

Milestone	Activity	From	To
Definition		**09 Jul 26**	**31 Oct 26**
	Code Manager Initial Assessment	July	August
	Solution Development	July	October
	Legal Review	July	August

RECCP Members noted the Issue background for I0331; and

- **AGREED** unanimously to approve the Change Path, Responsible Committee, Prioritisation Category and Urgency Status; and
- **AGREED** unanimously to approve the Issue timetable for I0331.

8 CHANGE PROPOSAL TRACKER

BA provided Members with an update on the Change Tracker.

BA advised that eight new submissions have been reviewed by the Code Manager since the last Change Panel meeting:

- I0338 - REC Change to align with CP1633 Capture Modem Module Details Under BSCP601: Issue accepted in by the Code Manager on 06 August 2026.
- R0339 - REC Change to align with BSC CP Clarify Supplier obligations for IF-002 messages where a Switch is cancelled: Change Proposal accepted in by the Code Manager on 06 August 2026.
- **Clarifying the process for Energy Suppliers to request a service point removal during energy theft investigations** - This submission has been rejected by the Code Manager as it is believed this should be a DCUSA change. This has been fed back to the Proposer (UK Revenue Protection Association) who are working to get a DCUSA change raised.
- I0340 - Amendments to the PARC relating to Address Management: Issue accepted in by the Code Manager on 13 August 2026.
- I0341 - Improved Validation for DI51599 - Electricity Smart Meter Equipment (ESME ID): Issue accepted in by the Code Manager on 13 August 2026.
- R0342 - Enabling Dual MSA & MSS (SVA MOA) appointments for WC connection types: Change Proposal accepted by the Code Manager in on 13 August 2026.
- I0343 - MSC - Amending Statement Production Timescales: Issue accepted in on 14 August 2026.
- **ECOES CSS Summary section updates**: This submission has been rejected by the Code Manager. This was not a change proposal, but a potential CSS data mismatch limited to 2 MPANs. This has been rejected, and the Code Manager has reached out to assist the Party with correcting the data mismatch.

BA provided an overview of further updates:

- I0278 - Establishing the Safe Isolation Provider (SIP) as a Standalone REC Party: The fourth closed working group session will take place on 18 August 2026 where members will continue to consider the solutions needed to establish a strong governance framework for standalone SIPs.

- R0284 - Updates to Schedule 14 Measurement Transformers Commissioning Timescales: On 12 August 2026, the Metering Expert Panel voted to approve this Change Proposal for implementation on 26 June 2027.
- R0333 – Smart Meter Communication Licence Code Changes: This Change is currently out for consultation, following approval to proceed at the 04 August Change Panel. The consultation will close on 28 August 2026 and will then return to Change Panel for its final vote on 15 September 2026.
- R0336 - Legal text to support REC Change R0180: On 13 August 2026, the Code Manager requested the Change Panel sign off on the Change Report (Proposal Plan) ex-committee, with a closing date of 20 August 2026.

9 ANY OTHER BUSINESS

9.1 ENERGY CODE REFORM UPDATE

NH provided the following updates on Ofgem's Energy Code Reform Programme:

Phase 2: ECC & GNC

"On 1st June we published our determination pursuant to regulation 3(8) of the Code Manager Selection Regulations 2024 of the basis of selection of Code Managers for the consolidated Electricity Commercial Code and Gas Network Code.

We sought expressions of interest from any person interested in becoming a Code Manager candidate for the Consolidated Electricity Commercial Code and Gas Network Code in January 2026. After careful consideration of all responses, we have decided the following:

To consider the Retail Energy Code Company for selection on a non-competitive basis for the Electricity Commercial Code (ECC), and

To consider Xoserve, in partnership with Encodar (as the Joint Office of Gas Transporters) and Talan, for selection on a non-competitive basis for the Gas Network Code (GNC).

We have invited both candidates to submit licensing assessment forms for the relevant Code, with a deadline of 1st September 2026. We will then consider this information and publish a notice stating whether we propose to grant them a Code Manager licence, which will be subject to stakeholder representations.

We also welcome the commitment of all incumbent Code Administrators to supporting a successful Phase 2 transition. Our experience with Phase 1 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. We will update in due course on our anticipated timescales for key activities.

Phase 2 consolidation

We have begun a series of workshops on methods of consolidating the ECC & GNC which will take place during August. These will provide vital stakeholder feed-in to ensure that the programme is shaped by the experience of Code Administrators, future Code Managers, CSDBs and Code parties. We intend to carry out further, targeted engagement to work through specific issues around consolidation in the coming months. Throughout these sessions we will continue to consider questions and points posed by attendees - reflecting and developing our thinking and proposals throughout the series of workshops.

Template Code Text Decision

The final template code text for Code Modifications and SAFs was published on Friday 7 August.

This follows from the consultation we issued on Friday 06 March after a consultation which was issued on Friday 06 March - that consultation ended on Friday 17 April. An email to relevant stakeholders will be sent out on the day with the link to this publication and key information for your consideration.

This is a final decision on the template code text – however, we recognise that specific adaptations to the template code text will be needed for each Code and therefore we intend to consult on these specific adaptations relative to each Code. In the first instance, we intend to focus on the phase 1 Codes, the Balancing and Settlement Code (BSC) and Retail Energy Code (REC) and plan to consult on those proposed adaptations in due course.

Phase 1 decision: transitional measures and code changes

We expect to publish the decision to April's phase 1 consultation by the end of August. This will cover how we intend to proceed with policy proposals on changes to the BSC and REC as well as transitional licence arrangements and the licence terms. This has been based on a full and in-depth analysis in order to take into account feedback from consultation responses.

This publication will set out more of the processes required to implement Energy Code Reform phase 1.

BSC Timeline Update

We had previously anticipated being ready to grant both the REC and BSC Code Manager licences by the end of 2026. We have now reviewed the delivery timetable and decided to stagger the two phase 1 appointments.

We remain on track for the REC appointment by the end of the year. For the BSC, we are now aiming to be ready to grant the licence in early 2027.

Given the greater size and complexity of the BSC, proceeding with the REC first gives us the most effective route to delivering both appointments successfully.

Both phase 1 appointments are still expected to be completed by the end of the 2026/27 financial year, and the revised sequencing will help us maintain momentum on phase 2 of the wider programme."

There was no further business raised, and the Chair closed the meeting.

DRAFT