RETAIL ENERGY CODE

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REC METERING EXPERT PANEL
MEETING MINUTES

MEETING	**RECMEP_25_0312**
DATE	**12 March 2025, 10:00**
LOCATION	**By teleconference**

Attendee	Representing	Initials	Role
Steve Brand	Code Manager	SB	Committee Chair
Richard Hill	Meter Equipment Managers	RH	Alternate Member
Paul Abreu	Network Operators	PA	Committee Member
Tracey Saunders	Network Operators	TS	Committee Member
Eric Fowler	MEMs	EF	Committee Member
Steve Mulinganie	Energy Suppliers	SM	Committee Member
Rebecca Griffiths	Retail Energy Code Company	RG	Subject Matter Expert
Glenn Sheern	Code Manager	GS	Subject Matter Expert
April Harbour	Code Manager	AH	Change Analyst
Brogan McNess	Code Manager	BMc	Secretariat
Caroline Freimuller	Code Manager	CF	Change Analyst
Shaun McRaith	Ofgem	SM	Observer
Lee Walker	Elexon	LW	Observer

1. INTRODUCTIONS

The Chair welcomed attendees to the REC Metering Expert Panel (RECMEP) meeting.

2. APPROVAL OF PREVIOUS MINUTES

RECMEP Members were invited to provide comments on the Draft Minutes of the meeting held on 12 February 2025. Members were informed that there were some track changes to the previous draft minutes, that have been uploaded to the portal for viewing. The Draft Minutes were approved by the Member without amendment.

3. REVIEW OF ACTION LOG

The Code Manager updated Members that there were no outstanding actions at this time.

4. METER PRODUCT UPDATE

RECMEP Members were provided with an update of the Meter Product Data Changes. Members were informed that the submission had passed Code Manager validation.

AH clarified to RECMEP Members that the MPD 2025_024 implementation date is the 19 March instead of the 19 February and that there was a correction to be made to the slides presented.

RECMEP Members noted the request and:

- **AGREED** unanimously to approve the Meter Product Data Changes MPD 2025_024

5. R0207 – IMPORT AND EXPORT MOA CHARGING CLARIFICATION

CF introduced the Change Report (Final Recommendation) to REC MEP Members. CF explained that the problem statement states that when the same electricity Metering Asset is used for both Import and Export measurements, the same Meter Operator Agent (MOA) must be appointed to both the Import and Export MPAN. This can lead to uncompetitive charging because the Export Supplier has no choice in the MOA they appoint. CF explained that the proposed solution involves inserting a sentence into Schedule 14 Metering Operations to ensure Export Suppliers are charged fairly in this specific scenario.

SM questioned whether OFGEM had expressed an opinion and noted it's unusuality. CF confirmed that the Code Manager had a call with Ofgem prior to raising the change to confirm if Ofgem were of the opinion this was outside the remit of the REC. Their opinion was there no "hard stop" at this time, and they were happy for it be taken through the change process for them to make a decision on. A conversation was also had with the REC legal team prior to raising the change, who noted it was unusual for codes to touch on charging but that they saw no issues as long as the change was Authority determined.

EF expressed concerns that Distribution Network Operator's (DNOs) are licenced and price-regulated, whereas this change would be reaching into a different type of market. CF explained that the legal text was based on the current Consolidated Metering Code of Practice (CoMCoP) clause 21.5.1 "the DNO shall, so far as practicable, treat all MOAs (including its own MOA/EMO business) in the same manner as regards costs charged by it", which is similar to text already within the REC. EF reiterated concerns, emphasising that this change would be reaching into a different type of market. CF acknowledged the concern and explained the rationale for the proposed change, including a summary of Party impact assessment responses received that confirmed multiple Suppliers thought this was an issue in the industry.

EF referred to a clause in CoMCoP that states the REC will not get involved in commercial disputes, identified on the call as 2.1(a): "Additionally, the REC Performance Assurance Board will be responsible for the operational governance of the CoMCoP, including investigating alleged matters of non-compliance, but not for arbitration of any subsequent commercial disputes." CF acknowledged the potential conflict and said this would be added to the R0152 Revision to CoMCoP change for review. However, the Code Manager feels that this clause does not necessarily preclude the inclusion of this solution as the REC OAM Disputes process could still be used if Parties wished.

CF provided Members with a summary of the case for change made by the Code Manager and how this change had a positive impact on two of three REC Objectives (and a neutral impact on the last). Specifically, the change aims to:

- Promote effective competition: By ensuring Export Suppliers are charged fairly, it prevents uncompetitive practices and allows for a more level playing field.
- Protect the interests of consumers: Fair charging practices ensure that consumers are not disadvantaged by the lack of choice in MOA appointment.
- Ensure efficient and effective operation: Although the impact on this objective is neutral, the change does not negatively affect the operational efficiency of the REC.

CF also provided a summary of the intangible benefits listed in the Change Report.

CF provided a summary of consultation responses received and of the Code Manager comments to the responses.

CF informed Members that the Code Manager's recommendation is that the Metering Expert Panel recommend to the Authority of approval of R0207 for implementation on 27 June 2025. The Chair informed Members that they would be voting on a recommendation to the Authority for R0207. RECMEP Members noted the contents of the change and:

- **REJECTED** unanimously the Code Manager recommendation to approve of proposed change solution to the Authority.
- **REJECTED** unanimously the Code Manager recommendation to approve the proposed implementation approach to the Authority.
- **REJECTED** unanimously the Code Manager recommendation to approve the proposed implementation date of 27 June 2025 to the Authority.

6. RO217 – CONTRACTUAL OBLIGATIONS FOR SIP

CF introduced Members to the current problem affecting Safe Isolation Providers (SIPs). CF stated that the current contractual obligation in Section 21 of Schedule 14 is too restrictive. Currently for Non-Domestic Premises, SIPs can only contract with the owner of the Premises. CF explained that this prevents SIPs from contracting with Non-Domestic occupiers who have permission from the owner (e.g. their landlord) to make changes to the building. CF explained the proposed solution to Members, clarifying that there will be new legal text, that will split out how SIPs can contract with Domestic and Non-Domestic Premises. Specifically, the change aims to:

- For domestic premises, no changes are made to current obligations and SIPs must still contract with the owner of the Premises.
- For Non-Domestic Premises, SIPs can contract with the owner or the occupier of the premise, subject to the occupier providing confirmation that they have the relevant permissions and consent from the owner.

CF explained that no Party impact assessment has been conducted because the change was considered minimal, affecting only SIPs. There was also no Service Provider impact assessment conducted as there are no impacted Service Providers.

CF provided a summary of the consultation responses received; four responses were received from one DNO, one Energy Supplier and two Metering Equipment Managers (MEMs) with all being in favour of the change being implemented. All respondents also agreed that this change should be self-governance determined by the RECMEP and implemented on 01 April 2025.

SM questioned if this extends beyond the owner to the occupier where relevant consent is in place and if there is a definition of the occupier in this context. CF explained that 'occupier' refers to the Consumer, user, or party to a supply contract. Schedule 1 clarifies that it's anyone in the premise who doesn't own it, for example landlord situations. SM questioned if that would include sub-letting, to which CM replied, that it would include sub-letting with relevant permission from the owner. SM raised the concern that the paperwork will become an issue later down the line with permissions and 'anybody' being able to make changes. CF confirmed that occupier is broad on purpose because it needs to confer rights to anyone who is living or working in a premises even when they don't own it, particularly with metering works. CF also clarified that 'occupier' is already a used term throughout Schedule 14 and CoMCoP, so if the issue was with the specific use of 'occupier' that may trigger a wider review of the REC. SM asked PA his opinion of the subject, to which PA replied that for Non-Domestic, it is usual for occupiers to have agreements with owners (for example shops), in which the occupier pays for a service and must ensure that when returned to the owner it is in the original condition. RH questioned what is defined as evidence of such an agreement, CF explained that it is not in the REC remit to define what goes into the SIPs entering contracts but within that of the SIP to ensure they are confident they have all the evidence they require to pass their audit.

A Supplier voted to reject, DNOs and the MEMs accepted the proposed change solution therefore the RECMEP;

- **APPROVED** the proposed change solution;
- **APPROVED** the proposed implementation approach; and
- **APPROVED** the proposed implementation date of **01 April 2025.**

7. METER CONFIGURATION TABLES

RECMEP Members were provided with an update regarding the Meter Configuration Tables.

RECMEP noted the update.

8. METERING HUB FEEDBACK

RECMEP Members were provided with an overview and update on the work RECCo and the Code Manager were undertaking on the Metering Hub. RG informed Members that the plan is to make the Metering Hub a go-to for metering information, with the first significant improvement made to the layout, changing the banners to tiles.

RG advised Members that there is a content review in progress. RG explained that some of the Safety and Technical bulletins are outdated and need reviewing and removal, which the MEP is responsible for providing instructions on what to remove. RG advised that the references to MOCOPA should be updated to the CoMCoP. This will be done by a lift and replace but the MEMs team reach out to DNOs to update the original documents. RG advised that the proposed action plan is the following:

- A tile for the Accession Wiki article, and one for the SIP Wiki article.
- Add an FAQ specific to Metering (and have a tile for it).
- Add a tile that links to an update of ongoing Metering Activity.
- Add a tile to any Metering blog articles, as a summary.
- Add a tile that has any open/recent Metering changes.

RH questioned that when reviewing documents do Members need to refer to documents published before a decision is made. RG confirmed that you should refer to such documents. SB requested for RG to send any information over, so a presentation of this item can be presented at the next AMO meeting.

RG to return to next RECMEP to discuss further reviewing and/or deletion of old documentation in more detail.

RECMEP Members noted both the overview and the update and were offered the opportunity to make any more suggestions for improvements.

9. INDUSTRY ISSUES AND CHANGE TRACKER

RECMEP Members were provided an overview of the REC issues and changes including an update on three items on the change tracker that impacted the Panel.

RECMEP Members noted both the overview and the update.

10. AOB

No further items were raised, and the meeting was closed.

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ANNEX A – VOTING TABLES (R0217)

Do you agree with the Code Managers recommendation to recommend approval of the proposed change solution?

Attendee	Representing	Vote
Richard Hill	Meter Equipment Managers	Approve
Paul Abreu	Network Operators	Approve
Tracey Saunders	Network Operators	Approve
Eric Fowler	MEMs	Approve
Steve Mulinganie	Energy Suppliers	Reject

Do you agree with the Code Managers recommendation to recommend approval of the proposed implementation approach?

Attendee	Representing	Vote
Richard Hill	Meter Equipment Managers	Approve
Paul Abreu	Network Operators	Approve
Tracey Saunders	Network Operators	Approve
Eric Fowler	MEMs	Approve
Steve Mulinganie	Energy Suppliers	Reject

Do you agree with the Code Managers recommendation to recommend approval of the proposed implementation date of 01 April 2025 to the Authority?

Attendee	Representing	Vote
Richard Hill	Meter Equipment Managers	Approve
Paul Abreu	Network Operators	Approve
Tracey Saunders	Network Operators	Approve
Eric Fowler	MEMs	Approve
Steve Mulinganie	Energy Suppliers	Reject

NEXT MEETING DATE: 09 APRIL 2025