RETAIL ENERGY CODE

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

CHANGE REPORT

R0152 – REVISION TO THE CONSOLIDATED METERING CODE OF PRACTICE (COMCOP)

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	12 September 2025
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Metering Expert Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	Medium	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Energy Suppliers, MEMs, EMOs, AMIs, ASPs, DNOs		

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

Following the implementation of the Consolidated Metering Code of Practice (CoMCoP) a number of issues have been identified by RECCo, The Code Manager and REC Parties, stating that REC Parties are unable to meet their obligations as currently presented in the CoMCoP. The Code Manager has reviewed these and determined changes are required.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the REC Metering Expert Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 12 September 2025.

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BACKGROUND

1 SUMMARY

On 01 April 2023 the new CoMCoP went live following the release of R0047 Metering Code of Practice Consolidation Review and R0084 Housekeeping changes to the approved legal text for R0047. The CoMCoP is a consolidation of four gas and electricity Codes that set out activities for the installation and maintenance of meters, providing the minimum standard that must be complied with to perform this work.

Since its implementation, a number of issues have been identified with the CoMCoP. These have been raised by REC Parties where they are unable to meet their obligations as currently presented in the CoMCoP. Some additional analysis has been completed by RECCo and submitted with this Change Proposal (REC Analysis CoMCoP document). This identified several changes that need to be made to the CoMCoP and potentially supporting accession documents. It is recognised that the analysis is not exhaustive, and that a more complete review is required by the Code Manager to determine what additional changes are needed.

There is a growing concern among REC Parties, particularly Metering Equipment Managers (MEMs), that they are contracting with Energy Suppliers on the assumption they are compliant with the CoMCoP, which may not be possible in its current iteration. This Change Proposal has been raised to ensure accurate text is held in the REC, addressing any omissions, clarifications, errors, duplication, and inconsistencies identified. This final legal text should enable REC Parties to be compliant and to allow the Metering Scheme Auditor to ensure audits are accurate and reflect practices in the field.

A derogation request has been submitted to and approved by the Performance Assurance Board (PAB) in relation to Parties' compliance with the CoMCoP while this change is on-going. The Code Manager has committed to providing the PAB with regular updates as the change progresses.

2 PROBLEM STATEMENT

MEMs are struggling to successfully and efficiently pass their CoMCoP audits and be compliant, due to inconsistencies and lack of clarity in the document. There has been concern expressed by MEMs, that when contracting with Energy Suppliers, they are proclaiming themselves compliant with the CoMCoP when this may or may not be true.

3 IMPACTS

REC SERVICE PROVIDERS
Metering Scheme Auditor (Wilcock)

RECCO / REC CODE MANAGER
Subject Matter Expert (SME) requirement to develop the change

REC PARTIES AND SERVICE USERS
MEMs
Energy Suppliers
DNOs
AMIs
EMOs
ASPs

REC DOCUMENTS / PRODUCTS
Consolidated Metering Code of Practice

MHHS DESIGN
No impact

MHHS DATA SPECIFICATION
No impact

MHHS CODE DRAFTING
Indirect impact

Market-wide Half Hourly Settlement (MHHS) is making minor changes to CoMCoP. These will be considered throughout solution development.

4 CROSS-CODE IMPACTS

There are no cross-code impacts associated with this Change Proposal.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**01-Dec-23**	**31-Jan-25**
	Solution Development (including Legal Review)	December-23	October-24
	Service Provider Impact Assessment	October-24	November-24
	Party Impact Assessment	October-24	November-24
	Solution Refinement	November-24	January-25
Change Proposal		**01-Feb-25**	**10-Jun-25**
	Business Case Assessment	February-25	February-25
	Consultation	February-25	April-25
	Solution Refinement	April-25	June-25
	Final Determination	June-25	June-25
Voting		**11-Jun-25**	**11-Jun-25**
	Appeal window closes	12-Jun-25	26-Jun-25

6 STAKEHOLDER ENGAGEMENT

From January to August 2024, the Code Manager ran weekly workgroups for the industry to feed into the solution for this Change Proposal. The work groups were attended by two SMEs provided by RECCo and a range of Parties from Energy Suppliers, DNOs and MEMs with an average of nine attendees each week. When required, the Code Manager has also sought expertise from RECCo, REC Performance Assurance, the Metering Scheme Auditor and REC Legal Counsel.

7 PRIORITY STATUS AND URGENCY

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	0	27	0
	Retail Markets Impact	Retail Risk(s)	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		2	9	18
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		2	17	17
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	2	10	20
				Overall Priority Score (rounded)	113

Priority Status	MEDIUM
Change Proposal Type	STANDARD

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SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

From January to August 2024, the Code Manager ran weekly workgroups for the industry to feed into the solution for this Change Proposal. The work groups were attended by two SMEs provided by RECCo and a range of Parties from Energy Suppliers, DNOs and MEMs with an average of nine attendees each week. When required, the Code Manager has also sought expertise from RECCo, REC Performance Assurance, the Metering Scheme Auditor and the REC Legal Counsel.

The work group separated the work into several phases:

- Phase 1 – ensuring the Parties listed against each Clause was correct;
- Phase 2 – removing duplication and re-ordering Clauses to ensure they were in a sensible place within CoMCoP;
- Phase 3 – rewording Clauses where required to ensure obligations were clear and correct;
- Phase 4 – rewording appendices where required to ensure obligations were clear and correct. This also included the creation of a new CoMCoP Supplementary Guidance Document which is proposed as new Category 3 document to house any appendices that are not mandatory to follow; and
- Phase 5 – reviewing Clauses from the Automated Meter Reader Service Provider Code of Practice (ASPCoP), the Code of Practice for Gas Metering Equipment Managers and Approved Meter Installers (MCoP), the Meter Operation Code of Practice (MOCoP) and the Smart Meter Installation Code of Practice (SMICoP) that were not added to CoMCoP during the first consolidation to see if they needed to be included.

The Code Manager also reviewed all REC Schedules to ensure any references to specific CoMCoP Clauses were flagged, as they may have needed to be updated once CoMCoP has been renumbered. Any REC Schedules which refer to CoMCoP only refers to the document, not a specific Clause number, so there are no consequential impacts to other REC Schedules from these CoMCoP changes.

9 PROPOSED SOLUTION

The proposed solution includes:

- Changes to CoMCoP;
- Changes to Schedule 1 Interpretations and Definitions; and
- The generation of a new Category 3 document, the CoMCoP Supplement Guidance Document.

10 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0152 can be found here.

Following consultation the Code Manager has provided four versions of CoMCoP:

- A word document showing all the red-lined changes from the current version of CoMCoP;
- A word document showing only the changes made from consultation;
- A clean word document with no tracked changes in it; and
- A clean excel spreadsheet with the new proposed CoMCoP.

There are also the suggested changes to Schedule 1 Interpretations and Definitions, and the proposed new Category 3 Document – the CoMCoP Supplementary Guidance Document.

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PRELIMINARY ASSESSMENT

11 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

11.1 SERVICE PROVIDER IMPACT ASSESSMENTS

A Service Provider impact assessment was completed by Wilcock in their role as the Metering Scheme Auditor from 10 October 2024 to 15 November 2024.

METERING SCHEME AUDITOR	• As expected, the Metering Scheme Auditor confirmed there would be time and effort required to amend the audit to match the updated version of CoMCoP. Based on the volume of changes expected, they have confirmed they will require 13 weeks between approval and go-live to make these changes. • The cost of this is expected to be £20,960 with no on-going operational costs. • The Metering Scheme Auditor has confirmed they will be able to start using the new audit from when the updated version of CoMCoP goes live and will not need to wait to the start of the next audit year. • It has been highlighted that any audits in progress at the time the updated version of CoMCoP goes live will be on the older version of the audit, but the Metering Scheme Auditor does not see that as an issue as these audits are being carried out currently.

11.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was conducted for an extended period from 10 October 2024 to 15 November 2024. A total of 14 responses were received from six Energy Suppliers, four DNOs, three MEMs and one MAP. One of these responses was submitted confidentially, and one anonymously. The public responses have been published here.

ENERGY SUPPLIERS	• Energy Suppliers were overall supportive of the change. Many legal text amendments were suggested which the Code Manager has reviewed. • There was overall agreement that the solution addressed the problem statement, and Energy Suppliers felt the change should be implemented. • Two Energy Suppliers felt a three month lead time for implementation would be sufficient, two felt no lead time would be required and two did not provide a response to this question. • Five Energy Suppliers confirmed they envisaged no costs to their business from implementation, with one providing no response. • Three Energy Suppliers confirmed they found the excel version of CoMCoP useful, with a further two confirming they felt a

	range of document for Parties to use based on their own preferences would be beneficial to the industry. • Four Energy Suppliers confirmed they agreed with the Code Manager's assessment that new obligations had not been created for Parties, with two not providing a response for this question.
DISTRIBUTION NETWORK OPERATORS	• DNOs were overall supportive of the change. Many legal text amendments were suggested which the Code Manager has reviewed. • There was overall agreement that the solution addressed the problem statement, and DNOs felt the change should be implemented. • Three DNOs confirmed they expected no to minimal lead time to be required for implementation, with one providing no response to this question. • Three DNOs confirmed they expected no to minimal costs from the implementation of this change, with one providing no response to this question. • Three DNOs confirmed they found the excel version of CoMCoP helpful, with one providing no response to this question.
METERING EQUIPMENT MANAGERS	• MEMs were overall supportive of the change. Many legal text amendments were suggested which the Code Manager has reviewed. • There was overall agreement that the solution addressed the problem statement, and MEMs felt the change should be implemented. • Two MEMs confirmed they expected no to minimal lead time to be required for implementation, with one providing no response to this question. • Two MEMs confirmed they expected no costs from the implementation of this change, with one providing no response to this question. • All three MEMs confirmed they found the excel version of CoMCoP very helpful and requested it be kept.
METER ASSET PROVIDERS	• The MAP was overall supportive of the change and felt it should be implemented. • They requested clarity that CoMCoP is a voluntary Code of Practice for ASPs, which the Code Manager has confirmed. • The MAP confirmed they did not require a lead time for implementation and that they did not expect any costs from implementation. • The MAP confirmed they found the excel version of CoMCoP useful.

12 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

12.1 RISKS AND ISSUES

NO.	RISK	NOTES	MITIGATION
R0152.CPP.R001	The scale of required changes is larger than initially thought at the start of solution development.		Closed - a structured solution development plan with clear industry engagement points was developed. Change Proposal Plan did not plan past solution development until scale of change was understood.
R0152.CPP.R002	Changes to CoMCoP may lead to changes in many other code documents if specific clause numbers are referenced.		Closed - The Code Manager has done a check of all code documents and any references to CoMCoP do not include clause number.

12.2 ASSUMPTIONS AND DEPENDENCIES

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
R0152.CPP.A001	The proposed changes will have no impact on REC Party obligations.	To be considered and captured throughout solution development.	Closed - this was validated by the Party impact assessment and consultation.

NO.	DEPENDENCY	NOTES	STATUS
R0152.CPP.D001	Metering Scheme Auditor may require go live to align with the start of the audit year.	Clarity requested in Service Provider initial impact assessment.	Closed – the Metering Scheme Auditor have confirmed in the initial impact assessment go live does not need to align with the start of a new audit year.
R0152.CPP.D002	Derogation is accepted for the known errors.	Derogation presented to PAB on 28 November 2023.	Closed – a temporary derogation was accepted. The Change plan will be shared to determine the

			agreed derogation timescales.
R0152.CPP.D003	R0064 is approved as that is being used as the CoMCoP baseline.		Closed – R0064 was approved.

13 BUSINESS CASE ASSESSMENT

13.1 COSTS

COSTS	DESIGN/ DEVELOPMENT COSTS	IMPLEMENTATION COSTS	ONGOING OPERATIONAL COSTS
METERING SCHEME AUDITOR	£20,960	£0	£0

There are no costs identified for the Code Manager, and all Parties who responded to the question regarding costs within the impact assessment confirmed they expected no to minimal costs from the implementation of this Change.

REC BUDGET APPROVAL SECURED FOR CENTRAL SYSTEM COSTS	15 January 2025

13.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
IMPROVED ACCURACY OF COMCOP	It is imperative that the CoMCoP is as accurate as possible as it is one of the core metering Code of Practices within the retail Energy industry. Inaccuracy could put engineers and Consumers in danger, create confusion over which Party has certain obligations and responsibilities, and potentially create situations where Parties are unable to pass audits as the legal drafting they are being audited against is incorrect.
INDIRECT POSITIVE CONSUMER OUTCOME	The updates to CoMCoP will provide confidence for Consumers that metering work being conducted on their property will be done by a person and/or company who has been adequately audited against a robust and accurate Code of Practice.
IMPROVED EFFICIENCY OF THE METERING ADUIT	The metering audit is currently not as efficient as it could be, as there are Clauses that are incorrect, unclear or have the wrong Party type assigned to them. Although the Metering Scheme Auditor has confirmed they have a mechanism to flag non-applicable Clauses during a Party's audit so it has no detrimental effect to their

	audit result, it will improve the efficiency of the audit for these questions to not be asked to the incorrect Party type.

13.3 COST BENEFIT ANALYSIS

As there are three intangible benefits and reasonable costs associated with this change, the Code Manager believes that the implementation of this change will overall benefit the industry and that there is a positive case for change.

The Code Manager did consider whether it was appropriate to implement CoMCoP outside of the start of the new audit year. A previous REC Change R0064 was also implemented during the metering audit window with minimal disruption, and the impact assessment with the Metering Scheme Auditor is in favour of this viewpoint. As such, the Code Manager believes that there is more benefit in implementing the updated CoMCoP as soon as possible rather than waiting until the next start of audit year.

14 CASE FOR CHANGE

The Code Manager considers there is a positive case 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 to minimal costs for REC Parties, and proportionate costs from the affected REC Service Provider (Metering Scheme Auditor);
- Has proportionate effort required for implementation;
- Increases the accuracy of CoMCoP, with it being detrimental to the industry if not implemented;
- Increases the efficiency of the Metering Audit as Parties will not have to review Clauses that should not have been assigned to them, and the removal of duplication should reduce evidence having to be provided multiple times;
- Provides confidence for Energy Suppliers when contracting with MEMs those MEMs have been audited against a robust and accurate Code of Practice; and
- Provides confidence for Consumers that metering work being conducted on their property is being done by a person and/or company who has been adequately audited against a robust and accurate Code of Practice.

15 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated for an extended period on 13 February 2025 to obtain views on the Change Report (For Consultation). In total 10 responses were received from one AMR Service Provider (ASP), three Energy Suppliers, four MEMs and two DNOs. The public responses have been published here.

The key themes from these responses have been summarised and set out below.

15.1 SUMMARY OF RESPONSES

The consultation responses were overall positive, with a majority of respondents confirming they agreed that this Change Proposal should be implemented.

Many further comments were provided on the legal text, which the Code Manager has reviewed with RECCo and RECCo appointed SMEs. The majority of proposed changes to the legal text from Parties have been actioned.

15.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

Many comments were provided on the legal text, of which the Code Manager has taken onboard and actioned roughly two thirds.

More information is available in the consolidated responses document published here, but the Code Manager has not provided a response on every comment as almost 400 comments were received, many in a format that could not be easily transferred to the consolidated consultation response template. Feedback to individual comments can be provided for Parties who wish for it, by contacting the Code Manager.

15.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

Seven respondents confirmed they agreed with the Code Managers assessment of the costs and benefits associated with this Change Proposal, with three providing no comments.

Nine respondents confirmed they agreed with the Code Managers assessment that this Change Proposal be subject to Self-Governance determination by the REC Metering Expert Panel and with the recommendation to approve.

Two of the nine respondents did provide caveats that their agreement was contingent on the consultation process being effective or once the drafting panel has agreed the document. The Code Manager has assumed that this respondent meant the Working Group when they referred to the drafting panel. The Code Manager has confirmed as part of their consultation comments that the Working Group set up at the start of this change is not being re-stood up and does not have any voting powers in relation to this change.

The Code Manager is confident that the change process (Working Group, impact assessment and consultation) have been effective and resulted in an updated version of CoMCoP which meets the criteria set out at the start of this change – removing duplication, adding clarity and ensuring all Clauses are allocated to the correct Parties.

15.4 IMPLEMENTATION DATE AND APPROACH

Eight respondents agreed with the Code Managers proposed implementation approach of a big bang implementation. One respondent provided no comment to this question, and one suggested there should be a period after implementation before compliance is required.

The Code Manager did consider this during the Service Provider impact assessment with the Metering Scheme Auditor but decided as there would be 13 weeks between final determination

and implementation for Parties to make any process changes they need to, the new version of CoMCoP could be applicable from its implementation date.

Six respondents agreed with the Code Managers proposed implementation date of 12 September 2025.

One respondent provided no comments, and one confirmed they thought this could be implemented earlier and be part of the June 2025 standard release. As the Metering Scheme Auditor requires 13 weeks between voting and implementation, 12 September 2025 is the earliest this Change Proposal could be implemented.

Two respondents said they only agreed with the 12 September 2025 implementation if the legal text is finished and the document is fit for purpose.

The Code Manager is happy with the final legal text that has been created as it is has been through numerous iterations between the Code Manager, the Working Group, the REC Legal Counsel, RECCo SMEs, Service Provider impact assessment, industry impact assessment and industry consultation. We are confident that the extended Party impact assessment and consultation periods have allowed adequate time for a detailed review by Parties and feel this has been validated by the number of comments received.

16 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

Many amendments were made to the legal text following consultation. The Code Manager has provided a version of CoMCoP red-lined showing only the changes from consultation, which is available as part of the legal text pack available here.

The Code Manager has added improved efficiency of the Metering Audit into Section 14 case for change of this report – this had been previously captured in the business case assessment but had been missed from the case for change.

The Code Manager has also updated the case for change to clarify that MEM's have been audited against a robust and accurate Code of Practice. This ensures greater confidence for Energy Suppliers when contracting MEMs, ensuring the problem statement is more strongly resolved.

17 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
CONSOLIDATED CONSULTATION COMMENTS	Link

18 GLOSSARY

TERM	DEFINITION
Approved Meter Installer (AMI)	means a Party which is approved (or which is seeking approval) as such under the Metering Accreditation Schedule, being the entity, which undertakes the installation, replacement, repair and maintenance of gas Metering Equipment.
Automated Meter Reading Service Provider (ASP)	means a person or persons that are approved, or are seeking approval, in accordance with the Metering Accreditation Schedule to offer services relating to the provision of consumption data from a utility meter collected through an AMR system.
Automated Meter Reading Service Providers Code of Practice for Gas Meter (ASPCoP)	means the AMR metering code of practice that has now been incorporated into the CoMCoP, and references to ' Automated Meter Reading Service Providers Code of Practice for Gas Meter' or 'ASPCoP' should be read as references to the CoMCoP.
Code of Practice for Gas Metering Equipment Managers and Approved Meter Installers (MCoP)	means the gas metering code of practice that has now been incorporated into the CoMCoP, and references to 'Code of Practice for Gas Metering Equipment Managers and Approved Meter Installers' or 'MCoP' should be read as references to the CoMCoP.
Consolidated Metering Code of Practise (CoMCoP)	means the code of practice against which relevant ASPs, MEMs and MIs are assessed pursuant to the metering Accreditation Schedule.
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Electricity Metering Operative (EMO)	means a Party which is approved (or which is seeking approval) as such under the Metering Accreditation Schedule, being an entity which undertakes the installation, replacement, repair and maintenance of electricity Metering Equipment.

Energy Supplier	Means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Meter Asset Manager (MAM)	means a Party which has Qualified in that role under the Qualification and Maintenance Schedule. Where used in respect of a particular Supply Meter Point, it means the MAM Appointed by a Gas Supplier in accordance with the Metering Operations Schedule. The MAM is accountable for the installation, replacement, repair and maintenance of gas Metering Equipment (either itself or by an AMI), and the MAM must also therefore be Accredited under the Metering Accreditation Schedule
Meter Asset Provider (MAP)	means the person that makes the Metering Assets for an RMP available for use by the Registered Supplier and the Consumer.
Meter Operator Agent (MOA)	means a Party which has Qualified in that role under the Qualification and Maintenance Schedule. Where used in respect of a particular Metering Point, it means the MOA Appointed by an Electricity Supplier in accordance with the Metering Operations Schedule. The MOA is accountable for the installation, replacement, repair and maintenance of electricity Metering Equipment (either itself or by an EMO), and the MOA must also therefore be Accredited under the Metering Accreditation Schedule
Meter Operator Code of Practice (MOCoP)	means the electricity metering code of practice that has now been incorporated into the CoMCoP and references to 'Meter Operator Code of Practice' or 'MOCoP' should read as references to the CoMCoP.
Metering Equipment Manager (MEM)	means, as applicable, either: (a) for electricity, a Meter Operator Agent (MOA); or (b) for gas, a Meter Asset Manager (MAM).
Metering Scheme Auditor	means a person appointed by the RECCo to audit compliance with the CoMCoP.
Smart Meter Installation Schedule (formally known as the Smart Meter Installation Code of Practice (SMICoP))	means the former REC Schedule 16 concerning smart meter installation, which has now been incorporated into the CoMCoP and references to 'Smart Meter Installation Schedule' should read as references to the CoMCoP.
Subject Matter Expert (SME)	means the individual(s) or organisation(s) contracted by RECCo and selected by the Code Manager for the purposes of analysing Change Proposals.