RETAIL ENERGY CODE

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

CHANGE REPORT

R0270 CLARIFICATION OF SIP QUALIFICATION REQUIREMENTS

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	27 February 2026
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Metering Expert Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	High	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	EMOs, SIPs		

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

REC Schedules 1, 14, and 15 all note that in order to Qualify as a Safe Isolation Provider (SIP), the Party needs to be a Qualified Meter Operator Agent (MOA). It has since been determined that Qualified Electricity Metering Operatives (EMOs) should also be able to Qualify as SIPs.

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 27 February 2026.

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BACKGROUND

1 SUMMARY

REC Change Proposal R0021 Allowing REC accredited MEMs to de-energise and re-energise supply points independent of the Supplier introduced the role of the SIP into the REC in the June 2023 release. The original definition of SIP introduced under this Change Proposal was "means a *Metering Equipment Manager* (MEM) which has been (and remains) accepted as a Safe Isolation Provider in accordance with paragraph 9 of the Metering Accreditation Schedule."

This definition was updated under REC Change Proposal R0064 Creating a Meter Operator Agent and MOCoP Installer to "means a *Meter Operator Agent* which has been (and remains) accepted as a Safe Isolation Provider in accordance with paragraph 9 of the Metering Accreditation Schedule" in the June 2024 release.

At the time the SIP role went live, the definition of MEM was "means for electricity, the Meter Operator Agent (as defined in the BSC) Appointed by an Electricity Supplier". This wording did not prohibit EMOs from Qualifying as SIPs, and several EMOs did Qualify as SIPs between June 2023 and June 2024.

This unintended consequence from the implementation of R0064 needs to be rectified, to allow EMOs to continue to Qualify as SIPs.

SIPs already have their own Market Participant Role Code (role code Y), so no changes are required to the Data Transfer Network (DTN) to facilitate this Change Proposal.

This Change Proposal is an interim solution before I0278 Establishing the Safe Isolation Provider (SIP) as a Standalone REC Metering Party is implemented, establishing the SIP as a standalone REC Party.

2 PROBLEM STATEMENT

Requiring SIPs to be fully Qualified MOAs may be hindering smaller Parties who wish to be SIPs from Qualifying under the REC. This in turn may be reducing the number of Qualified SIPs in the market for Consumers to choose from or causing Consumers inadvertently to contract with people who are not Qualified SIPs to carry out SIP Works.

3 IMPACTS

CONSUMERS
Electricity Consumers

REC PARTIES AND SERVICE USERS
EMOs
SIPs

REC DOCUMENTS / PRODUCTS
Schedule 1 – Interpretations and Definitions
Schedule 14 – Metering Operations
Schedule 15 – Metering Accreditation

MHHS
There are no expected impacts to MHHS from this Change Proposal.

4 CROSS-CODE IMPACTS

This Change Proposal has been discussed at the Cross Code Steering Group (CCSG) meeting on 06 October 2025, with offline discussions happening between the REC and the Distribution Connection and Use of System Agreement (DCUSA) in September 2025. It is expected a DCUSA change proposal will also be required.

Although no DCUSA change proposal has currently been raised, the REC is comfortable proceeding to Final Recommendation and implementation with this Change Proposal as there are already EMOs operating as SIPs under both REC and DCUSA. The corrections to both codes need to be made as soon as possible. As such, the Code Manager does not believe it is necessary to wait for the DCUSA corrections before implementing the REC Change Proposal, particularly when this is an interim solution before the implementation of REC Issue I0278 Establishing the Safe Isolation Provider (SIP) as a Standalone REC Metering Party.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**16 Sept 25**	**30 Nov 25**
	Code Manager Initial Assessment	September	September
	Solution Development	October	November
	Legal Review	November	November
Change Proposal		**01 Dec 25**	**10 Feb 26**
	Business Case Assessment	December	December
	Consultation	December	January
	Solution Refinement	January	February
	Final Determination	February	February
Voting		**11 Feb 26**	**11 Feb 26**
	Appeal Window	12 February	26 February

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6 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	1	27	27
	Retail Markets Impact	Innovation and Market Arrangements	2	17	33
	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		3	9	28
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	Contribution to/ Alignment with RECCo's Forward Work Plan		2		17
Urgency *(The need to progress a change to meet a targeted date)*		Cross Code Activity	1	10	10
				Overall Priority Score (rounded)	156

Priority Status	HIGH
Change Proposal Type	STANDARD

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SOLUTION

7 PROPOSED SOLUTION

The proposed solution for R0270 makes amendments to REC Schedules 1 Interpretations and Definitions, 14 Metering Operations and 15 Metering Accreditation.

The proposed amendment to Schedule 1 updates the definition of SIP as below:

> *means a Meter Operator Agent or Electricity Metering Operative which has been (and remains) accepted as a Safe Isolation Provider in accordance with paragraph 9 of the Metering Accreditation Schedule.*

The proposed amendments to Schedule 14 update paragraphs 28.1 and 43.1 as below:

> *This paragraph [28 / 43] applies only to MOAs or EMOs which have been (and remain) accepted as a Safe Isolation Provider (SIP).*

The proposed amendments to Schedule 15 update the reference from MOAs, to MOAs and EMOs, in regard to SIPs throughout the Schedule. These include paragraph 1.6 and most paragraphs within Section 9.

8 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0270 can be found here.

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PRELIMINARY ASSESSMENT

9 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

9.1 SERVICE PROVIDER IMPACT ASSESSMENTS

No Service Provider impact assessment was required for this Change Proposal.

9.2 REC PARTY IMPACT ASSESSMENTS

No Party impact assessment was conducted for this Change Proposal.

As some EMOs are already Qualified as SIPs, the Code Manager determined there would be minimal impact from the introduction of this Change Proposal. However, it was also determined this Change Proposal needed to be implemented as soon as possible so the Code is correct.

10 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

There are no risks, assumptions, issues or dependencies identified with this Change Proposal.

11 BUSINESS CASE ASSESSMENT

11.1 COSTS

There are no central system costs associated with this Change Proposal. The Code Manager has not identified any costs to Parties from the implementation of this Change Proposal.

11.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
INCREASE COMPETITION WITHIN THE SIP MARKET FOR ELECTRICITY CONSUMERS	By allowing more Party types to Qualify as SIPs, this should lead to increased competition within the SIP market and provide benefits for Electricity Consumers. These benefits are seen as encouraging competitive pricing from an increased number of SIP Parties, as well as enhanced safety as it should be easier to find and contract with a REC Qualified SIP.
CORRECT THE REC IN REGARD TO THE ORIGINAL INTENTION REGARDING SIPS	When R0021 went live in June 2023, the definition of SIP allowed Electricity MEMs to Qualify as SIPs. Between this date and June 2024 when R0064 updated the definition, both MOAs and EMOs (as referred to under current REC terminology) Qualified as SIPs. The implementation of this Change Proposal will update the definition of SIP back to the original intention of R0021. It will also correct the Code so the EMOs who are already Qualified as SIPs are not in breach of any obligations.

ALLOW FOR AN APPROPRIATE LEVEL OF QUALFICATION REQUIREMENTS FOR SIPS	It has been reported anecdotally to the Code Manager that the requirement to be a fully Qualified MOA in order to be a SIP is a barrier for entry for smaller Parties who wish to be SIPs. Amending the requirement to allow EMOs to Qualify as SIPs should remove this barrier. The REC Performance Assurance team has confirmed that when an EMO Qualifies as a SIP, there are extra Qualification requirements to ensure they can send/receive any Market Messages required by SIPs.

11.3 COST BENEFIT ANALYSIS

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

12 CASE FOR CHANGE

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

- Is both viable and implementable, and effectively resolves the problem statement;
- Has no associated central system or Party costs;
- Has proportionate effort required for implementation;
- Should lead to an increase in SIPs (and competition) within the market, which should lead to benefits for Electricity Consumers looking to contract with SIPs;
- Corrects the REC to the original intention when SIPs were introduced; and
- Allows SIPs to Qualify under the REC with appropriate requirements.

13 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 12 December 2025 to obtain views on the Change Report (For Consultation). In total one response was received from an Energy Supplier. The key themes from this response have been summarised and set out below. The response has been published here.

13.1 SUMMARY OF RESPONSES

The respondent was supportive of the Change Proposal and agreed it should be implemented.

13.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

The respondent agreed with the proposed solution and had no comments on the legal text.

13.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

The respondent agreed with the costs and benefits as laid out by the Code Manager. The respondent agreed with the Code Manager recommendation that this Change Proposal should be approved, and should be subject to the Self-Governance Change Path with the Metering Expert Panel as the Responsible Committee.

13.4 IMPLEMENTATION DATE AND APPROACH

The respondent agreed with the Code Manager recommendation that this Change Proposal be subject to a Big Bang implementation, and with the proposed implementation date of 27 February 2026.

14 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No amendments have been made following consultation.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED CONSULTATION RESPONSES	Link
RELATED CHANGE(S)	R0021 Allowing REC accredited MEMs to de-energise and re-energise supply points independent of the Supplier R0064 Creating a Meter Operator Agent and MOCoP Installer I0278 Establishing the Safe Isolation Provider (SIP) as a Standalone REC Metering Party

16 GLOSSARY

TERM	DEFINITION
Cross Code Steering Group (CCSG)	means the group of that name described in Paragraph 3 of the Change Management Schedule.
Data Transfer Network (DTN)	has the meaning given to that expression in the Data Transfer Services Agreement.
Distribution Connection and Use of System Agreement (DCUSA)	means the agreement of that name maintained pursuant to the Electricity Distribution Licences.
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.
Market Participant Role Code	means the code which identifies the role which a Market Participant performs in the market.
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.
Qualified	means: (a) for a REC Service, that a Party or an organisation which has entered into an Access Agreement has successfully qualified (and remains qualified) to use that REC Service under the Qualification and Maintenance Schedule; (b) or (b) For the role of Electricity Supplier, Gas Supplier, Distribution Network Operator, Gas Transporter, Meter Asset Manager or Meter Operator Agent, that a Party has successfully qualified (and remains qualified) in that role under the Qualification and Maintenance Schedule. The words “Qualify”, “Qualification” and similar expressions shall be interpreted accordingly.
Safe Isolation Provider (SIP)	means a Meter Operator Agent which has been (and remains) accepted as a Safe Isolation Provider in accordance with paragraph 9 of the Metering Accreditation Schedule.
Safe Isolation Provider Works (SIP Works)	means work which a Safe Isolation Provider is permitted to undertake under and in accordance with the Distribution Connection and Use of System Agreement.