RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

REC METERING EXPERT PANEL
MEETING MINUTES

MEETING	**RECMEP_26_0610**
DATE	**10 June 2026, 10:00**
LOCATION	**By teleconference**

Attendee	Representing	Initials	Role
Steve Brand	Code Manager	SB	Committee Chair
Edma Hyskaj	Code Manager	EH	Secretariat
Glenn Sheern	Code Manager	GS	Head of Regulatory Specialists
James Hardy	Code Manager	JH	Senior Change Lead
Lydia Bentley	Code Manager	LB	Senior Change Lead
Holly Law	Code Manager	HL	Change Delivery and Release Manager
Harriet Truss	Code Manager	HT	Regulatory Senior Consultant
Jemma Johnson	RECCo	JJ	Market Design Lead
Rebecca Griffiths	RECCo	RG	Metering Services Delivery Manager
Steve Mulanganie	Supplier Representative	SM	Committee Member
Martin Brailsford	Meter Operator Agents	MB	Committee Member
Dean Berry	Meter Asset Managers	DB	Committee Member
Warren Lacey	Distribution Network Operators	WL	Committee Member
David Mitchell	Gas Transporter	DM	Alternate Member
Chris Varney	Supplier Representative	CV	Alternate Member
Scott McPhillimy	Ofgem Representative	SMc	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 13 May 2026.

One minor amendment was identified by WL relating to a typographical error where "Distribution Network Operators" had been incorrectly referenced. This was agreed to be corrected.

The Draft Minutes were approved by the members.

3. REVIEW OF ACTION LOG

The Code Manager advised that there was currently one outstanding action on the actions log.

- **RECMEP_26_0513_01**: The Code Manager (HL) confirmed engagement with the Smart Energy Code (SEC), where the issue has been escalated to Subject Matter Experts (SMEs) and added to the risk register. It was noted that adherence to best practice guidance would be monitored through the Performance Assurance Board (PAB).

JJ raised concerns around cross-code visibility of incidents, highlighting that lack of awareness across codes could present risks and should be addressed more formally. The action was approved to **close** with ongoing monitoring via SEC Processes.

WL had also requested an update on the action which was added post-meeting for the Code Manager (CF) to confirm what the 40% statistic in the DCUSA report represented:

- **RECMEP_26_0513_02:** The Code Manager (CF) had reached out to DCUSA but had not received a response to the request for greater clarification on the 40% statistic.

RECMEP Members **NOTED** the update.

4. R0207 – IMPORT/ EXPORT MOA CHARGING CLARIFICATION

RECMEP Members were provided with the final recommendation for "R0207 – Import/ Export MOA Charging Clarification".

HL outlined the background to the issue, outcomes of the working group activity following the Authority send-back and the proposed revised solution. HL introduced the item, noting that the issue arises where the same electricity Metering Asset is used for the measurement of both Import and Export across multiple Metering Points. In such cases, the Export Meter Operator Agent (MOA) is required to be the same as the Import MOA. It was explained that this creates a limitation for Export Suppliers, as they are unable to appoint their own MOA, which may result in uncompetitive charging and contractual complexities. In particular, Export Suppliers may not have existing contractual relationships with the appointed MOA, and in some instances, MOAs may be unwilling to enter into such agreements.

The Panel was reminded that the original proposal sought to address this through the introduction of legal text requiring MOAs, so far as reasonably practicable, to charge Export Suppliers on a consistent basis. However, following a recommendation of rejection from the Panel, the Authority issued a send-back in May 2025, requesting further work.

HL highlighted the key concerns raised by the Authority, including the inappropriate comparison to Distribution Network Operator (DNO) charging practices, the limitations of the Performance Assurance Board (PAB) in resolving commercial disputes, and the risk that enforcing uniform charging could reduce competition or lead to increased costs for some Parties. It was emphasised that any revised solution, as far as reasonably practicable, must promote competition and protect Consumer interests, particularly in relation to the potential pass-through of costs.

In response, a working group was convened to develop a revised solution. The Panel was informed that the updated approach moves away from attempting to regulate pricing and instead introduces a requirement for MOAs to provide a defined set of Basic Associated Export MOA Services where they are appointed to an associated Import Metering Point. These services are to be provided without requiring a direct contract or payment from the Export Supplier.

It was clarified that this requirement applies only to Market-wide Half-Hourly Settlement (MHHS) Metering Points, reflecting existing obligations under the MHHS framework. The services are limited to essential activities and do not extend to Site Visits or bespoke services. Where additional or enhanced services are required, Export Suppliers retain the ability to enter into bilateral agreements with MOAs.

HL further explained that through the working group and Impact Assessment, careful consideration had been given to competition and Consumer impacts.

As far as reasonably practicable, any solution must promote competition and ensure the interest of Consumers, particularly with pass through charges, is protected. Therefore, the impact assessment sought to seek feedback on the proposal itself, as well as the assumptions regarding impacts to competition and Consumers. This included seeking input on the commercial impacts to MOAs and Energy Suppliers, which were shared confidentially. This approach and the questions included in the impact assessment, were agreed at the second working group meeting on 20 October 2025. The assumptions that were confirmed as part of the Impact Assessment were;

- A MHHS Qualified MOA must provide the minimum services referenced in the definition of Basic Export MOA Services (auto-appointment/de-appointment, updates to meter information, etc.) as part of their services provided to an Import Supplier. This is required regardless of whether a contract is in place with the Export Supplier. Each MOA providing this service must therefore already consider the cost of these services when determining charges to the Import Supplier, as there is no guarantee they will be able to recover costs from the Export Supplier directly. Therefore, it is reasonable to assume that a MOA may consider these costs in its charges to the Import Supplier. In this scenario, the Import Supplier is still able to benefit from competition, as it would be for the MOA to determine if and how these costs would need to be recovered.

- If a MOA has not factored in the costs of providing the Basic Export MOA Services, it is not expected that any costs a MOA may choose to recover in their charges to Import Suppliers would be material beyond those charges currently agreed. In the event that individual MOA's choose to introduce significant cost uplifts, the benefits of competition would still be available to the Import Supplier to validate and benchmark costs in the market.
- Any additional costs incurred from the implementation of this Change Proposal are unlikely to materially exceed the allowances made by Suppliers for the provision of Metering Services, and therefore should not result in a direct, material impact to Consumers.

The legal drafting changes were summarised at a high level, including the introduction of new definitions to Schedule 1 and amendments to Schedule 14 to formalise the requirement for Basic Associated Export MOA Services and clarify the associated appointment arrangements.

The Panel was also presented with the outcomes of stakeholder engagement through a Party impact assessment. The Party impact assessment showed broad support for the proposal, with the majority of respondents agreeing that the solution addresses the issue and represents an improvement on earlier versions. Some feedback had been received regarding service timescales and scope, which was addressed through refinements to the legal drafting. It was also noted that while there is industry appetite for reviewing the Export Metering arrangements more generally, including responsibility for meter works in Import/Export metering scenarios, these will be progressed separately (under Issue I0312 – Review of export meter work arrangements), and an interim solution is required in the meantime.

Following the impact assessment, a consultation was issued in April 2026, which received four responses, all supportive of the proposed solution and progression to Authority determination. One respondent raised concerns regarding the implementation date; however, the implementation date was agreed by the R0207 working group following consideration of the updates Parties would be required to make, with the conclusion that most of these changes would be necessary regardless of the outcome of this Change Proposal, and HL confirmed that the proposed minimum three-month notice period was deemed appropriate given the nature of the changes.

HL noted that Ofgem had been engaged throughout the development of the revised solution, including participation in working group discussions. MB raised a question regarding the likely timing of Authority approval and whether implementation could align with the November 2026 release. HL advised that this would be dependent on Ofgem timelines, with approval needing to be received by approximately mid-August to meet that release window. MB emphasised that earlier implementation would be preferable in order to reduce ongoing complexity and avoid further delays.

WL raised a further question regarding the consultation responses, specifically whether any concerns raised by respondents required further consideration. HL confirmed that the respondent who raised concerns had been contacted directly and that the issue related to implementation timelines had already been considered within the working group. It was

reiterated that the recommendation for at least three months' notice reflects known industry constraints, including internal review timelines and required contractual changes.

RECMEP **NOTED** the update and, in line with the recommendation from the Code Manager unanimously:

- **AGREED** to recommend to the Authority that the proposed solution should be implemented;
- **AGREED** to recommend to the Authority the proposed implementation date of the next standard REC release following Authority approval, provided at least 3 months' notice between approval and implementation.
- **AGREED** to recommend to the Authority the proposed implementation of Big Bang.

5. R0252 – INCREASING FREQUENCY OF ANNUAL PORTFOLIO RECONCILIATION EXERCISE TO SUPPORT DATA CLEANSE

RECMEP Members were provided with an update on the revised Change Plan for "R0252 – Increasing frequency of Annual portfolio reconciliation exercise to support Data Cleanse".

LB outlined the background to the Change Proposal, noting that Meter Asset Managers (MAMs) are currently required to submit portfolio data and metering asset information annually to the Central Data Service Provider (CDSP) for reconciliation. The CDSP then identifies discrepancies between its data and that submitted by MAMs, with outputs provided to REC Performance Assurance (RPA) for resolution with industry parties.

It was explained that RPA had identified limitations in the existing process, namely the lengthy turnaround time of approximately 75 working days and the infrequency of annual reconciliation, both of which reduce the effectiveness and accuracy of data cleansing activities. As a result, the proposed change seeks to increase reconciliation frequency (to bi-annual) and reduce reporting timelines.

The Panel was informed that development of the solution has required close collaboration with CDSP, RECCo and RPA. During the impact assessment phase, CDSP confirmed that the proposed approach is deliverable; however, this is dependent on assurance mechanisms to ensure timely submission of data by MAMs. Consequently, significant time has been spent exploring dependencies on Performance Assurance arrangements, including engagement with the incoming provider, Moorehouse.

LB noted that these discussions had taken longer than initially anticipated, due to the need to confirm both the overall viability of the solution and whether the proposed Performance Assurance approach would provide sufficient confidence to support implementation. It was confirmed that, as of the week of the meeting, a "go" decision had been reached, with confirmation that the proposed assurance approach is viable and addresses CDSP's requirements.

Members were advised that, following this confirmation, the next step will be to initiate further rounds of impact assessment, after which a cost-benefit analysis will be developed. Subject to

the outcome, the Code Manager intends to return to RECMEP to seek approval to proceed to consultation, currently targeted for the August 2026 RECMEP meeting.

RECMEP **NOTED** and **APPROVED** the revised Change Plan.

6. CHANGE OF MARKET SEGMENT GUIDANCE – UPDATE FOR APPROVAL

RECMEP Members were provided with an update on "Change of Market Segment Guidance – Update for Approval".

HT explained that the proposed update arises from a service desk query, which identified a misalignment between REC guidance and how systems operate in practice under the Meter Point Registration System (MPRS), specifically in Advanced-to-Smart change of market segment scenarios.

Under the existing process, the issuance of the IF-035 (SMRS Appointment Status Notification) would typically trigger the losing Meter Operator Agent (MOA) to issue a D0268 (Advanced Meter Technical Details). However, it was noted that for Advanced-to-Smart transitions, this flow was not intended to occur, and existing REC guidance assumed the IF-035 would not be sent to the losing MOA. In practice, this exclusion was not implemented in system design, meaning the IF-035 message continues to be issued.

The Panel was informed that there is no intention within the BSC to amend this system behaviour, and therefore the proposed update seeks to align REC guidance with actual operational processes. The revised guidance clarifies that:

- There is no obligation on the losing MOA to issue the D0268 in this scenario; and
- Where a D0268 is issued and received, no action is required by the gaining MOA.

Members discussed the proposed wording, with MB raising a query regarding whether the guidance should explicitly instruct parties not to send the D0268, or whether to retain more flexible wording. It was explained that the current approach is intended to accommodate automated processes already in place, ensuring that parties are not required to amend systems unnecessarily while clearly stating that no action is required.

Further comments were raised by SM regarding the use of wording such as "ignore," with Members agreeing that this may be ambiguous or inappropriate in a governance context. It was proposed that wording be refined to explicitly state that "no action is required", providing clearer and more consistent interpretation. HT agreed to update the drafting accordingly.

RECMEP **APPROVED** the Update to the Change of Market Segment Guidance document for implementation via a Category 3 Change proposal.

RECMEP_26_0610_01: Code Manager (HT) to review the legal wording of 'ignore' and update it to 'no action is required' in the document.

7. I0197 – INTRODUCING A PROCESS TO PROVIDE UPDATES DURING FAULT RESOLUTIONS

RECMEP Members were provided with an update on the Change Plan for "I0197 – Introducing a Process to Provide Updates during Fault Resolutions".

JH explained that, following earlier working group activity, the change had progressed into legal drafting; however, further complexities have been identified, particularly in relation to the Performance Assurance framework.

It was noted that additional work is required to refine the scope of the solution and ensure that any proposed obligations are clear, proportionate, and enforceable within the REC. This includes aligning the solution with existing REC arrangements, accommodating both gas and electricity processes, and ensuring applicability under Marketwide Half-Hourly Settlement (MHHS) and legacy arrangements. A key dependency is the ability to define how obligations would be monitored, reported, and assured, which is not yet sufficiently developed to support progression to full impact assessment.

Members were advised that these challenges are compounded by the ongoing transition to a new Performance Assurance Service Provider, expected to complete in September 2026. As a result, there remains uncertainty around the final assurance approach and associated delivery timelines. While discussions are ongoing with RECCo and both current and incoming providers, a definitive position is unlikely before the transition is complete.

JH emphasised that placing the change on hold is intended to avoid further uncertainty for industry parties and prevent unnecessary effort against timelines that cannot yet be met. Work will continue in the background to refine the solution, and a further update, including a revised plan, will be brought back to the Metering Expert Panel once there is greater clarity.

During discussion, MB acknowledged the complexity of the change and raised concerns regarding potential delays. It was suggested that the change should remain a priority and that consideration could be given to structuring delivery appropriately, including whether scope may need to be split if required. The importance of maintaining a coherent and structured solution, rather than fragmenting into multiple smaller changes, was also emphasised. JH confirmed that the focus remains on developing a robust and deliverable solution, ensuring that all relevant aspects identified through working group discussions are retained and progressed effectively.

RECMEP **NOTED** the update to plan and **APPROVED** the update to plan to place I0197 on hold.

8. MONTHLY CHANGE TRACKER

RECMEP Members were provided with an overview of the REC issues and changes within the change tracker that impacted the Panel.

- R0284 - Updates to Schedule 14 Measurement Transformers Commissioning Timescales – Following the closure of the consultation impacts to BSCP515 section 3.3A and BSCP705 section 3.3 had been identified. The Code Manager has raised

the change to the BSC as a cross-code change with the REC as the Lead Code, who expect to take it to 07 July 2026 Supplier Volume Allocation Group (SVG) and then proceed immediately to consultation. It is expected to be presented at the August 2026 Metering Expert Panel.

RECMEP **NOTED** both the overview and the update.

9. METERING HUB AND BULLETINS

RECMEP Members were invited to provide any updates on metering-related bulletins, specifically to identify whether any relevant bulletins had been issued but not yet submitted through the established process. No such instances were identified by Members during the discussion.

MB noted that there may be potential bulletin submissions arising from recent AMO discussions. It was confirmed that these are currently under consideration and, if progressed, will be brought forward through the appropriate channels in due course.

The Chair also sought an update on feedback relating to non-DNO engagement. MB advised that, due to recent availability, he had not yet finalised his review but committed to providing an update by the end of the week.

Finally, the Chair informed Members of ongoing discussions with FEN (now part of IGEM) regarding the consolidation of gas network guidance documentation. It is expected that existing ENA guidance will be transitioned into a FEN format in the near term to improve clarity and consistency.

RECMEP **NOTED** the update.

RECMEP_26_0610_02: MB to provide the update on feedback relating to non-DNO engagement.

10. AOB

13.1. FORTHCOMING OPERATIONAL METERING FORUMS

RECMEP Members were informed of planned presentations at upcoming meetings of the Gas and Electricity Operational Metering Forums.

13.2. UPDATES ON STIR GUIDANCE AND CUT-OUT GLOSSARY

MB provided an update regarding the STIR Guidance and Cut-Out Glossary documents. It was noted that a recent bilateral working group between AMO and ENA had discussed the importance of maintaining the quality, accuracy and relevance of these documents. As a result, it was proposed that a dedicated working group be established to undertake a structured review, identify improvements, and support a more continuous improvement approach before bringing recommendations back to the Metering Expert Panel. Members raised no objections to this approach.

During discussion, Members emphasised the importance of ensuring that any updates are managed through appropriate governance processes. It was confirmed by HL that outputs from

such a working group would be formally documented, consulted on where required, and brought back to Metering Expert Panel for approval via the established Category 3 change process. Members also highlighted the need for clarity of roles and structure, including whether the review activity should operate as a formal subcommittee or working group, to ensure transparency and consistency in decision-making.

Members further discussed the categorisation and governance of associated documents, including the STIR Guidance and Cut-Out Glossary. It was noted that the STIR Guidance, while currently classified as Category 3, may warrant reconsideration given the level of obligation it places on industry participants. Reference was made to a previous change proposal R0145 - Service Termination Issue Reporting (Change to Category 2 document) on this topic, and Members agreed that it would be useful to revisit this in light of evolving governance arrangements, including the transition to a licensed Code Manager and potential enhancements to document version control. Clarification was also provided that the Cut-Out Glossary does not currently sit within REC governance, though any future alignment would require a formal change process.

13.3. CODE CONSOLIDATION PHASE 2 FOR REC GOVERNANCE STRUCTURES

SM requested that RECCo provide a high-level update on the implications of Code Consolidation Phase 2 for REC governance structures, particularly the role of subcommittees such as RECMEP. JJ agreed to take this forward and provide an update at a future meeting.

RECMEP **NOTED** the update.

RECMEP_26_0610_03: RECCo (JJ) to provide an update on the implications of Code Consolidation Phase 2 for REC governance structures.

Next meeting date: 08 July 2026