RETAIL ENERGY CODE

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MEETING MINUTES

MEETING	**RECPAB_25_0429**
DATE	**29 April, 10:00am**
LOCATION	**Virtual Teams**

Attendee	Representing	Initials	Role
Jon Dixon	RECCo	JD	PAB Chair
Dorcas Batstone	Independent Member	Dba	PAB Member
Steve Arthur	Independent Member	SA	PAB Member
Angela Joyce	Supplier Representative	AJo	PAB Member
Paul Saker	Supplier Representative	PS	PAB Member
Anne Jackson	UNC Representative	AJa	PAB Member
David Brown	MEM Representative	DBr	PAB Member
Paul Everett	Supplier Representative	PE	PAB Member
Fungai Madzivadondo	DNO Representative	FM	PAB Member
Marina Papathoma	GT Representative	MP	PAB Member
Beth Procter	SECCo Representative	BP	PAB Member
Faye Brookes Lewis	Citizens Advice Representative	FBL	PAB Member
Andrew Waghorn	Code Manager	AWa	Performance Assurance Analytics Lead
Walter Carlton	Code Manager	WC	Performance Assurance Partner
Anton Moden	Code Manager	AM	Performance Assurance Lead
Tanya Mason-Hawes	Code Manager	TMH	PAB Secretary
Daniel Rodgers	Code Manager	DR	Performance Assurance Qualification Manager
Anna Weeks	RECCo	AWe	Senior Operations Analyst
Kev Duddy	Code Manager	SR	Operational Account Manager (Alternative)
Eve Marriner *(Attended for item 2)*	Code Manager	EM	Operational Account Manager
Jonathan Hawkins *(Attended for item 2)*	RECCo	JH	Director of Operations Programmes
Harriet Truss *(Attended for item 3)*	Code Manager	HT	Senior Change Lead
Marcus Dunkerley *(Attended for items 4 and 5)*	RECCo	MD	Service Delivery Manager
Sarah Mower	C&C	SM	Relationship Manager

Attendee	Representing	Initials	Role
(Attended for item 4)			
Andres Alvarez *(Attended for items 4 and 5)*	RECCo	AA	Service Delivery Manager
David Addison *(Attended for item 5)*	Xoserve	DA	GES Change Manager
Jayne McGlone *(Attended for item 5)*	Xoserve	JM	Compliance Manager
Elliot Dunn *(Attended for item 5)*	Correla	ED	Senior Client Relationship Manager
Sue Treverton *(Attended for item 5)*	Correla	ST	Application Services Manager
Bilal Ali *(Attended for item 6)*	DCC	BA	Director of Customer Relationship / Service Management
Keith Foster *(Attended for item 6)*	RECCo	KF	CRS Improvement Programme Lead
Elise Hardy *(Attended for item 7)*	Code Manager	EH	Release Manager
Mark Muirhead *(Attended for item 10)*	Ofgem	MM	Senior Financial Supervisor
Holly Abbott *(Attended for item 10)*	Elexon	HA	Head of Assurance
Supplier Representative *(Attended for item 10)*	REC Party Supplier	SR1	Operations Manager
Supplier Representative *(Attended for item 10)*	REC Party Supplier	SR2	CEO
Supplier Representative *(Attended for item 10)*	REC Party Supplier	SR3	Director

1. REVIEW OF OPEN ACTIONS AND APPROVAL OF DRAFT MINUTES

The Chair welcomed attendees to the meeting of the PAB. Apologies were given for Cristina Ullastre, Steve Verdon and Simon Waltho. The PAB was also informed that Oorlagh Chapman can no longer act as a PAB Alternative.

The Code Manager informed the PAB that the following updates were made to the 25 March 2025 minutes:

Clarification of the actions for the Derogation Applications in that:

- Utilita Field Services Limited requested a temporary derogation until new Sealing Pliers could be ordered;
- Morrison Energy Services requested for the existing Sealing Pliers to remain with the current operative throughout the restricting and beyond.

The PAB unanimously **APPROVED** the actions and draft minutes from the PAB meeting held on 25 March 2025. PAB Members reviewed the open and overdue actions. Eight actions were closed following information provided in the meeting papers or via a verbal update. Please refer to the Action Log for a full status update.

1 DEROGATION APPLICATION

EM and JH joined the meeting.

The Code Manager presented a paper which covered how certificates to the Central Switching Service (CSS) test environment being used for Market-wide Half Hourly Settlement (MHHS) testing are to be managed. Specifically, it was proposed that the test certificates relating to Rebel Energy are maintained to avoid disruption to the MHHS Programme, following Rebel Energy entering the Supplier of Last Resort (SoLR) process. In response to a question from a PAB Member, the Code Manager agreed that they will confirm that Rebel Energy staff do not have access to the certificates or test environment. Responsibility for testing will move to E (Gas and Electricity) Limited, a different customer of the associated managed service provider. The testing approach means that this would not affect the data used. A PAB member raised the possibility some former Rebel Energy staff may be recruited by E (Gas and Electricity). The Code Manager confirmed that they would raise this with the managed service provider to confirm if this happens these new staff do not retain access not required due to their role.

The PAB:

- **APPROVED** that the test certificates relating to Rebel Energy are maintained to avoid disruption to the MHHS Programme, following Rebel Energy entering the Supplier of Last Resort (SoLR) process

EM and JH left the meeting.

2 R0202 CHANGE REPORT

HT joined the meeting.

The Code Manager presented the R0202 PARC Change Proposal, which had already gone through consultation with two responses, both generally supportive. The proposal aimed to improve reporting ahead of MHHS go-live, with an implementation date of 27th June 2025.

The Code Manager noted that subject to PAB's approval, the first reports would be due in August, and the 4th working day of every month thereafter. There have been no changes to the solution previously presented.

PAB Members:

- **REVIEWED** the contents of the Change Report and the Code Manager recommendation;
- **APPROVED** the proposed change solution;

- **APPROVED** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 27 June 2025.

NEW ACTION: The Code Manager to pass on the PAB's thanks to thank the volunteer MOA for their input to R0202.

HT left the meeting.

3 EES PERFORMANCE UPDATE

AA, MD, SM joined the meeting.

The Code Manager introduced the PAB deep dives for key REC Services in 2025, commencing with a deep dive into EES performance. C&C representatives presented the performance of the enquiry services, highlighting strong performance. They covered issues related to security assurance, noting the need for regular management activities like penetration testing and business continuity testing.

The Code Manager noted that an action plan had been agreed upon to address the identified security assurance issues and ensure regular testing is conducted.

The Code Manager noted that the PAB should consider if the requirements are relevant and correct, which is separate from C&C and RECCo delivering the requirements as requested.

PAB Members:

- **NOTED** the contents of this paper, provided to support the PAB in their consideration of information provided by the Service Provider.

SM left the meeting.

4 GES DEEP DIVE

DA, JM, ED, ST joined the meeting.

The Code Manager introduced the PAB deep dive into GES performance. Representatives from RECCo, Xoserve and Correla presented an information paper on GES activity and performance which considered the areas where the Service is currently not meeting its target performance levels and highlighted specific P2 incidents in November and December 2024, and February 2025 that caused brief outages.

They discussed issues related to data latency, explaining that high traffic and batch processing of data from UK Link were contributing factors.

An Xoserve representative noted an error in some of the slides and that he would re-issue with corrections.

Plans for future improvements include addressing the root causes of data latency and service responsiveness issues, and enhancing the technology to better support high volumes of API calls. Xoserve will be undertaking platform maintenance and upgrade activities in line with that over the coming year, in a way that is cost effective and also minimises impacts to users of the service.

PAB Members:

- **NOTED** the contents of this paper, provided to support the PAB in their consideration of information provided by the Service Provider.
- **APPROVED** the Periodic Monitoring Performance Assurance Technique (PAT) to be applied from the options presented in Section 3 of the paper.

AA, MD, DA, JM, ED, ST left the meeting.

5 CRS IMPROVEMENT

BA, KF joined the meeting.

Representatives from RECCo and DCC presented an update on the CRS Improvements Plan which was requested by Ofgem, whereby the objective is to deliver improvements to the delivery of the CRS that will benefit industry and consumers. The plan comprises five workstreams and has been developed in line with the priorities set out in Ofgem's decision document on the future of the Centralised Registration Service (CRS) and reported stakeholder feedback:

- The address data quality workstream focuses on improving the quality of address data by targeting specific issues identified through better understanding of the unmatched data.
- The change management workstream aims to deliver changes more quickly and economically, with better engagement and communication with users.
- The engagement and communications workstream which will improve the quality of interactions between DCC, RECCo and the Code Manager.
- The incident management workstream seeks to deliver resolutions to incidents more efficiently and keep users better informed of progress and solutions.
- The reporting workstream aims to deliver reporting more efficiently and cost-effectively, supporting increased transparency and understanding of switching service performance.

PAB Members queried the level of scrutiny and senior level engagement in the plan, as well as the sight anticipating future risks and mitigations. The representative from DCC explained that the Managing Director of Operations and key external stakeholders are aware of the plans. They also noted that they can share some of the Risk Log, where the risks and mitigations are captured.

NEW ACTION: RECCo and DCC to provide an update on the current position with regards to incentivisation for DCC, following discussions with Ofgem.

PAB Members:

- **NOTED** the plan.
- **AGREED** that a quarterly frequently for updates on progress and the delivery of benefits is sufficient (with the next update being July 2025).

BA, KF left the meeting.

6 DATA ACCESS REQUESTS AND UPDATE ON THIRD-PARTY LEGAL ADVISERS

The Code Manager updated the PAB on a previous action from February's PAB. They also presented a Data Access Request for additional data items to help identify when a Radio Teleswitch (RTS) may be present within Housing Association properties. A consultation was conducted originally and as such there were no plans to consult again, but noted the consultation responses were very

supportive of being able to provision access to these categories. The Code Manager also noted that there are no MHHS data items for these categories.

PAB Members noted that the data items include the secondary end-point and the supplier, with the secondary end-point required to have the same supplier as the primary endpoint. The concern is where the primary and secondary end-points are not recorded as related, so may not be identified when searching EES for those secondary end-points. PAB Members noted that the supporting information when communicating the change should be clear and understood by the receivers.

PAB Members:

- **APPROVED** the Code Manager's proposed alterations to the Electricity Data Access Matrix;
- **APPROVED** the Code Manager's implementation date of these changes for 09 May 2025.

EH left the meeting.

7 QUALIFICATION UPDATE

The Code Manager presented an update on Qualification and matters including the I0218 Proposal; work-off plan; Market Entry and Metering Trackers; and MHHS Qualification Documentation.

The Code Manager noted that many of these documents are quite mature at this point, as an example, the Qualification approach and plan has had four versions that have been approved by PAB but it is expected that there will be some minor updates over the coming months.

A PAB Member questioned whether these updates would still be circulated within the existing MHHS workgroups. The Code Manager confirmed that these changes would continue to be circulated at MHHS Qualification Working Group (QWG) and Qualification Advisory Group (QAG) for industry awareness and consultation, and where applicable the updates will also continue to be approved by the QAG.

PAB Members:

- **APPROVED** that updates to MHHS Qualification document can be approved by the Code Manager where:
  - The initial document was previously approved by PAB; and
  - The updates to the document do not substantially change the approach taken to MHHS Qualification, but instead reflect practical and housekeeping changes.

8 OPERATING PLAN

The Code Manager provided an update on the amendments made to the PAB Terms of Reference as well as further updates to specific actions.

The PAB:

- **NOTED** the update.

9 PARTY ASSURANCE UDPATE

MM, HA joined the meeting.

The Code Manager highlighted a Supplier Party not currently operating as a Qualified Electricity Supplier and recommended the revocation of the Party's access to CSS and a referral being made to Ofgem.

The Code Manager also provided a high-level update on the analysis of Switching trend data and recommended new measures for monitoring. Based on feedback from REC Issues Group (RIG) members, the Code Manager proposed to introduce Specific Topic Monitoring PAT to understand the trends and their root causes and assess whether it is beneficial to measure these monthly.

The Code Manager updated the PAB on the status of the Party currently under the Specific Condition Performance Assurance Technique (PAT), who later attended PAB to discuss their progress and answer questions from PAB Members. The Code Manager explained that the Supplier had actively engaged to demonstrate progress against the exit criteria set out by the PAB in December to enable resumption of the ability to register customers on CSS which had been temporarily suspended. The Party had also recently provided a signed Directors letter for additional comfort which explains the processes and ownership in the place.

SR1, SR2, SR3 joined the meeting.

The Supplier Representatives joined and expressed confidence in the operational measures implemented to prevent breaches. A Supplier Representative described how they have aligned processes, implemented triggers, and provided weekly management reports to ensure compliance.

The Supplier Representatives described the efforts to align processes and teams, specifically around disputed reads, erroneous transfers, and objections. These improvements aim to enhance operational efficiency and compliance. Further, they explained the new three-tiered approach to managing registration limits, which includes a soft threshold, a warning threshold, and a hard threshold. This approach ensures that registrations are managed effectively to prevent breaches. They also informed PAB of the weekly management reports implemented to monitor outstanding disputes. These reports provide transparency and help ensure that the measures in place are effective in preventing breaches. They also explained the additional measures, such as automatic system shutdowns and change management processes, to prevent breaches and ensure compliance. These measures provide multiple layers of redundancy to avoid exceeding registration limits.

PAB Members expressed their concerns around gaining trust and confidence in the Party, as well as how the Sales Team would be managed to prevent over-enthusiastic customer acquisition. The Party further explained the extensive work already complete to align processes, as well as the regular communication with the Operational Contract Manager to ensure ongoing compliance. They also clarified that the concerns raised with regards to the Sales Team were more technical than operational and that new controls have been implemented to avoid duplicative registrations and other errors.

The Elexon representative inquired about the Party's current supply count and how close they are to the 45,000 limit, to which the Party responded that they are around 42,000 and explained their plan to register 2,000 customers caught in between the Specific Condition PAT being issued and the CSS registration block.

The Code Manager noted that once the Specific Condition PAT had been lifted, the Party will return to the previous Periodic Monitoring PAT in place. The Code Manager advised that should the Party breach the revised CME cap of 45,000 meter points it will suspend CSS access and bring forward recommendations to the PAB to consider the application of escalation PATs such as the Event of Default PAT.

SR1, SR2 left the meeting.

The Code Manager also noted that some performance data might be available more quickly, and they would look to accelerate data collection for the Party's specific performance where possible. However, the full suite of relevant risk drivers would follow the normal cycle of timing.

The Ofgem representative noted that the Party is permitted to register the (estimated) 2,000 customers that have contracts in place.

PAB Members:

- **APPROVED** the Code Manager to suspend the Party's ability to register customers on CSS if they breach their Controlled Market Entry (CME) conditions again following the removal of CSS restrictions currently in place and to raise escalation PATs for PAB's approval, as set out in section 2 of the paper.
- **APPROVED** the revocation of a Party's access to CSS as they are not operating as a Qualified Electricity Supplier and make a referral to Ofgem of this decision as set out in section 3 of the paper.
- **APPROVED** the application of the Specific Topic Monitoring PAT as set out in section 5 of the paper.
- **NOTED** the update on a recent Supplier of Last Resort (SoLR) notification as set out in section **Error! Reference source not found.**.
- **NOTED** update on Market and Party performance based on data received by 01 April 2025

MM, HA left the meeting.

10 ANY OTHER BUSINESS

PAB Members further discussed the PAB Deep Dives from earlier in the meeting and expressed concern that some service delivery matters around business continuity, disaster recovery and security had not been addressed previously through service provider contract management. PAB Members asked whether there were expectations for RECCo and Xoserve to return to PAB at a later date. It was clarified that as the Code Manager would be working alongside RECCo and Xoserve, the Code Manager would provide periodic updates to PAB as the Periodic Monitoring Performance Assurance Technique (PAT) progresses.

PAB Members and the Code Manager also discussed Correla Discovery and if it were to cease as a contractor to Xoserve, and the risk of them disappearing from the platform.

NEW ACTION: The Code Manager to confirm with Xoserve what the implications might be should Correla Discovery cease as a contractor.

11 NEXT MEETING DATE

The next meeting of the PAB will be held online on 27 May 2025.