RETAIL ENERGY CODE

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REFERENCE	**RECPAB_25_0729_FORINFO_01**
STATUS	**FOR INFORMATION**
PAGES	**2**

R0152 REVISION TO THE CONSOLIDATED METERING CODE OF PRACTICE (COMCOP): PAB UPDATE

BY CAROLINE FREIMULLER (SENIOR CHANGE LEAD)

REVIEWED BY HOLLY LAW (CHANGE DELIVERY AND RELEASE MANAGER)

FOR INFORMATION 	This paper provides a high-level update on REC Change R0152 Revision to the Consolidated Metering Code of Practice (CoMCoP) and the associated derogation (RECDER_19). The PAB are asked to note this paper.

1 BACKGROUND

The Consolidated Metering Code of Practice (CoMCoP) was implemented on 01 April 2023. In order for Parties to be compliant with the CoMCoP, it was identified that multiple changes were required to its approved legal text to address omissions, clarifications, errors and inconsistencies in the original drafting.

R0152 was raised in October 2023 to provide an end-to-end review of the CoMCoP with the above aims. Changing Parties' obligations was out of scope of this Change Proposal.

2 DEROGATION (RECDER_19)

The Code Manager submitted a Derogation Application in November 2023 to enable Parties to remain compliant with the CoMCoP whilst R0152 was being progressed through the REC Change Process.

The Derogation was discussed by the PAB in November 2023 and approved in December 2023. The PAB approved for the Derogation to be applied to the 63 instances where the CoMCoP clauses were incorrectly allocated to the wrong REC Party type. It was approved for the Derogation to be in place until 30 April 2024, with the REC Change Management Team being required to provide an update on the progress made with R0152 at the April 2024 PAB meeting.

At the April 2024 PAB meeting, an update was provided by the REC Change Management team. This included an additional 23 clauses to be added to the derogation and a

recommendation to extend the derogation until the implementation of R0152. Both were approved by the PAB.

In June 2025, R0152 was approved by the REC Metering Expert Panel with an implementation date of 07 November 2025. This means as per the previous PAB decision, RECDER_19 will end on 07 November 2025, having been in place for two years.

3 LESSONS LEARNED

At the April 2024 PAB meeting, RECCo presented a CoMCoP Review Lessons Learned paper. Lessons highlighted included:

- Tight timelines limited thorough review of draft documents;
- Limited availability of expertise in the market;
- Stakeholder engagement lacked sufficient tailoring for Parties most impacted by the changes; and
- Increased Code Manager involvement at an earlier stage in the process.

The Code Manager believes these have all been addressed under the R0152 review in the following ways:

- Extended impact assessment (six weeks) and consultation (eight weeks) periods, to allow impacted Parties enough time to review all documentation thoroughly;
- Initial solution development was done at an open industry working group between January and August 2024 to allow for maximum engagement with Parties and utilise their in-house expertise, plus two RECCo appointed Subject Matter Experts (SMEs) who supported throughout the R0152 Change Proposal;
- Ustilising the REC Operational Account Managers (OAMs) to contact impacted Party types to ensure they were aware of the working group, impact assessment and consultation, plus contacting Parties whose CoMCoP audit falls between the implementation of R0152 and the end of the audit year as part of release activities; and
- The Code Manager led all stages of the R0152 Change Proposal.

4 ASSURANCE ACTIVITY AND OPERTIONAL READINESS

The Metering Auditor, Wilcock Consultants Limited (WCL), commenced its 13-week delivery programme on 30 June 2025, incorporating additional lead time ahead of the planned implementation date of 7 November to accommodate any unforeseen complexities. Progress to date includes the early-stage drafting of revised Audit Questions in line with REC Change R0152, alongside the development of supporting technical updates to WCL's AuditForm system. The programme remains on track, with delivery supported by oversight from an independent SME and RECCo's Metering Service Delivery Manager, and in close collaboration with the Code Manager. Finalised audit materials will be published in conjunction with the formal implementation of the updated CoMCoP text, ensuring full alignment with the approved requirements.