RETAIL ENERGY CODE

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

MEETING MINUTES

MEETING	**RECPAB_25_0826**
DATE	**26 August 2025**
LOCATION	**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
Steve Verdon	Independent Member	SV	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	MPa	PAB Member
Beth Procter	SECCo Representative	BP	PAB Member
Simon Waltho	BSC Representative	SW	Performance Assurance Manager (Elexon)
Alice Williams	Citizens Advice Representative	AWi	PAB Member
Kev Duddy	Code Manager	KD	Operational Account Manager
Walter Carlton	Code Manager	WC	Performance Assurance Partner
Anton Moden	Code Manager	AM	Performance Assurance Lead
Andrew Waghorn	Code Manager	AWa	Performance Assurance Analytics Lead
Vaishnavi Campbell-Sharma	Code Manager	VCS	Performance Assurance Manager
Tom Stewart	Code Manager	TS	Performance Assurance Analytics Manager
Bailey Robb	Code Manager	BR	PAB Secretary
Anna Weeks	RECCo	AWe	Senior Operations Analyst
Elise Handy (*for item 2 only*)	Code Manager	EH	Operational Account Manager
Ollie Bowden (*for item 4 only*)	Code Manager	OB	REC Technical Services Consultant
Mark Pearce (*for item 4 only*)	Code Manager	MPe	REC Technical Services Lead

DRAFT

Attendee	Representing	Initials	Role
Sodiq Lawal (*for item 7 only*)	Code Manager	SL	Service Provider Assurance

1. APPROVAL OF PREVIOUS MINUTES AND REVIEW OF ACTION LOG

The Chair welcomed attendees to the meeting of the PAB.

The PAB unanimously **APPROVED** the actions and draft minutes from the PAB meeting held on 29 July 2025. PAB Members reviewed the open and overdue actions. Three 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.

2. DATA ACCESS REQUESTS

EH joined the meeting.

The PAB was presented with a paper from the Code Manager seeking the addition of a new category for the National Energy System Operator (NESO) to the Electricity Data Access Matrix and the necessary alterations of associated documents.

The Code Manager noted that they had originally received a narrow request from NESO, however, following previous feedback from the PAB, the Code Manager has worked with NESO to give them access to data items that they believe they need to prevent them from having to come back and request these at a later stage. As noted within the paper, this includes some MHHS items and access to the online portal.

The Code Manager noted that there were a limited number of personal data items included within the request, including address and MPAN. The Code Manager outlined that, if approved, a ten working day consultation will be held as usual.

A PAB Member queried, in relation to MHHS data items, what will happen to all those with current access once migration into the MHSS space commences, particularly where they may want certain pieces of information that may not be available or where they may not understand the new system. The Code Manager advised that changes were made at the beginning of the year which categorised the programme approved data items with the intention of these being available when MHHS does go live. The Code Manager advised the PAB that these conversations have been ongoing with users to ensure they are aware that things will look slightly different and that, as they migrate over, some data actions may not be populated. The Code Manager further advised that they are signposting users to a range of resources, including the webinars from RECCo.

DRAFT

Another PAB Member raised a concern that while consumers do not have a direct relationship with NESO, the personal data items being requested seem very broad. They queried as to what the Code Manager expects the triggers to be for NESO to access this personal data. The Code Manager advised that the main use cases were the extensive work that NESO do with the BSC, such as validating different programmes, and that while the request includes personal data items, these would only be provided for those narrow use cases. The Code Manager further advised that the 'always open' data items were being provided as it was noted that things are going to change with the BSC and as such, these will provide a single source of truth that NESO can use with other data sets to check and validate. The Code Manager reiterated that NESO's role is to manage the UK's energy system, and they believe the request is the right thing to do in giving them access to data items as they need.

Additionally, another PAB Member raised a query around address and MPAN data. They queried whether RECCo have any liability if addresses are incorrect when handing over the information to users or whether it accepts no liability. The Code Manager advised that they were unsure on their part but where address information is incorrect and they are alerted to it, they advise those reporting to contact the Supplier to get that corrected.

The PAB Chair advised that they were unaware of the liability situation but that it was a good question to raise and that they would take an action to review the situation. The PAB Chair noted that they believed it was done on a 'best endeavours' kind of basis to update things as and when, and there was an acceptance that data isn't guaranteed. A RECCo representative noted that they were unsure but queried as to whether liability is covered within the access agreement. Another PAB Member advised it was their understanding that every data item in the enquiry services had a data owner, so there is a responsibility under the REC for keeping these data items up to date, and as such, there should be a named individual for traceability. The Code Manager noted that the concept of the data master does exist under the REC but that through previous searching, there appeared to be some gaps in identifying who the data owners were for each data item. The Code Manager noted that they are picking this up with REC Technical Services (RTS) to progress.

The PAB:

- **APPROVED** the Code Manager's proposed alterations to the Electricity Data Access Matrix;
- **APPROVED** the Code Manager's proposed alterations to Appendix 1;
- **APPROVED** the Code Manager's proposed alterations to the Service User Categorisation and Assessment Document; and
- **APPROVED** the Code Manager's implementation date of these changes for **26 September 2025.**

NEW ACTION: The PAB Chair to review RECCo's responsibility for data held on enquiry services and any potential liability if data accessed via enquiry services proves inaccurate.

The review should also assess the level of accuracy, and the robustness of the data held within the enquiry service, as well as how users are informed about respective responsibilities for data held by the enquiry services.

This review should also determine whether access agreements require additional indemnities to address these issues.

3. QUALIFICATION UPDATE

The Code Manager presented an update to the PAB on Qualification activities, covering progress of activities to support the MHHS Programme. The Code Manager also sought PAB approval for escalating PATs for Parties who had not completed their MHHS Legacy Assurance PAT. The Code Manager noted that the Management Assertion was due by 6 August 2025 for Electricity Suppliers and Meter Operator Agents (MOAs), to confirm that they are ready to support MHHS Cutover.

The Code Manager updated PAB that since the paper was published, two Parties named in the paper had submitted their legacy assurance assertion, with the other named Parties still pending. The Code Manager outlined the request for PAB approval of the escalating PATs as the next steps for those Parties who do not complete their Management Assertion by the deadline. For Suppliers, this would be an Escalation PAT as a referral to Ofgem given that the current M10 criteria requires confirmation that all Parties are ready for M10, thereby potentially impacting the go live for MHHS. For MOAs, the Code Manager will notify Supplier(s) of the meter points to deappoint that MOA before commencing the process of removing the MOA's accreditation under the REC.

The Code Manager advised PAB that one Supplier and MOA had informed them that they may not be able to provide the required Assertion, and that they were currently engaging with those Parties. The Supplier and MOA Parties advised that this was due to their CRM system, which is in the process of being replaced but where progress has been slower than intended. The Code Manager is meeting with the Party, along with the MHHS Programme and BSC representative, to discuss the next steps.

The PAB Chair queried whether this work was being done in collaboration with BSC and whether it is possible that Parties may have informed one Performance Assurance team of their readiness but perhaps not the other. The Code Manager confirmed that they had informed BSC Performance Assurance and are working closely with them on this.

A PAB Member questioned why the Code Manager was intending to write to Supplier(s) in the event of a MOA missing the Assertion deadline given that it was their understanding that the PAB had moved away from a 'Supplier Hub' approach given the limited influence over the actions of their agents. The Code Manager clarified that it was their intention to contact Supplier(s) to ensure the MOA is deappointed from the impacted meter points to ensure that they do not have any issues when MHHS migration commences.

DRAFT

Additionally, the Code Manager informed the PAB of a potential issue with reports from CSS discovered during the MHHS Legacy Assurance activity. In undertaking the legacy assurance by using a portfolio report from CSS, the Code Manager identified some discrepancies in the number of active registrations that Supplier MPIDs hold. Certain Suppliers had informed the Code Manager that their MPIDs were dormant, but that they were still showing active registrations within the CSS Supplier Portfolio report. The Code Manager advised the PAB that they had been working with DCC since becoming aware of this issue to fully understand the issue and to determine what steps are required to correct the information.

The Code Manager explained to PAB that analysis has demonstrated that there are essentially two 'pots' of meter points that exist which are resulting in the discrepancy. The first 'pot' has c. 67,000 MPANs, where the MPAN has an active registration record in CSS with more than one Supplier. DCC believe this has happened during the initial data load for CSS and due to switching activity happening close to the CSS go live date. Furthermore, DCC have reviewed this 'pot' and have confirmed that those MPANs have not been prevented from switching, and that CSS tends to use the latest Supplier active registration information to contact the Supplier for the switching messages.

The Code Manager explained that there are a number of scenarios for this first 'pot'. Firstly, an incorrect registration record that does not reflect what the correct position should be, but instead of there being a second correct active registration, there is a stale registration record leftover. The majority of these appear to be in the circumstance where the request for deregistration by the supplier, which is the very last step that should be happening, has not been processed correctly. The Code Manager noted that there is a data fix that can be applied by DCC to this first 'pot' of MPANs.

The Code Manager noted that the CSS report used was also received by Ofgem, with a suggestion that they may be using this to map against the M10 Go/No-go criteria. The Code Manager advised that DCC are trying to prevent any impacts on M10 and are trying to get the data cleansed by 15 September 2025. DCC have also been asked to inform Ofgem about this discrepancy within the reports issued to them.

A Supplier PAB Member queried whether this may be the same issue they are having with a number of MPANs where they have working to get them deregistered from one of their MPIDs, and where they are with another supplier on EES. The Code Manager was unable to confirm whether this was the case, and had noted that CSS has informed them that essentially there are two registration records and that these do not match between EES and CSS. The Code Manager explained that they are working to pull data from CSS to help confirm this. The PAB Member advised the Code Manager that they would forward the data on that they referred to for the Code Manager to review to determine whether it is impacted by this issue.

The Code Manager advised that there are challenges to map the differences between the aggregate report from CSS and the data in Enquiry Services, as the CSS reports do not contain MPxN level detail. The Code Manager has been provided with the list of 67,000 MPANs from DCC and performed an initial

comparison but believe there may be more differences from those currently captured in the list from CSS.

The Code Manager noted that there is a part of that difference where meter points haven't been deregistered once they have been disconnected, which is an existing known issue where Suppliers are not tidying up at the last step of the process and comprise the second 'pot' of discrepancies between EES and CSS. These are MPANs that have got almost all the way through the disconnection journey but haven't been deregistered by the Supplier. There is an existing change in flight to place an SLA on Suppliers to deregister disconnected MPxNs from CSS in a timely manner, as there is not one currently. The Code Manager explained the challenge that as the data is in EES, once it reaches that state, it is no longer associated with any supplier in EES, and there are currently around 2.5 million disconnected MPANs in EES. At this stage, the Code Manager is attempting to get a list of the remaining MPANs to determine the number of MPANs impacted.

A PAB Member queried whether this issue could have had an impact on the data used for REC invoicing if that had been done. The Code Manager advised the PAB that it was their understanding that this reporting goes to the Code Manager and RECCo. On the point on REC Invoicing, the Code Manager has not yet had a detailed conversation with REC Finance but it would have likely had an impact on invoicing, as well as potential impact on the Theft Detection Incentive Scheme (TDIS) as the reporting is used to set the market share for the scheme; however the Code Manager does not believe it would have a significant effect on the scheme.

In terms of next steps, the Code Manager advised that there are a number of actions being progressed with other REC Service Providers. The first step, currently ongoing, is to receive and check the data to ensure all the facts are clear. DCC are also completing the actions that they have flagged to support the analysis, however, there may be some scenarios where they may need to request input from RECCo or approvals from PAB to fix the data. The Code Manager explained that a Derogation may also be required to deal with any MPIDs that have been removed from MDD, and the current proposal is for all these to end on one specified day, rather than trying to determine the true end date for each. The Code Manager advised that there is also the need to confirm which MPANs form part of 'pot' two and which Suppliers are impacted, ensuring they are engaged in the process to deregister MPANs that have been disconnected per the existing REC obligation. However, there may need to be a Derogation for that also if there are non-operational MPIDs in there as the supply doesn't exist anymore and there aren't systems to send Market Messages to CSS.

Furthermore, the Code Manager needs to assess what else has been impacted by this issue and work out whether anything else needs to be done as a result, and that they need to understand how this happened. There is also a need for communication with those Suppliers in particular that are affected by this, and there may need to be communication with DNOs depending on the findings. Additionally, the Code Manager will check if there is a similar issue on the gas side as it cannot be ruled out that they have been impacted.

A PAB Member queried whether there would be any potential retrospective decision making and what impacts on the decisions, informed by some of this incorrect information, by the PAB over the time of this issue. The Code Manager advised that the second 'pot' is not a CSS error, rather, it is a Supplier issue and there is a process laid out in the REC, including a timeline that they need to follow. In relation to the first 'pot', the Code Manager indicated that it appears to be a CSS reporting issue and that this existed since the introduction of faster switching as it would appear that is where these error records had come. The Code Manager noted that in relation to decisions of the PAB, there are very few, if any, decisions that are made or driven particularly by portfolio size.

The PAB Member noted that the issue has happened, and the Code Manager will need to understand it fully but advised that there is now a trust and confidence issue that may bring the focus on to the PAB to explain previous decisions. The Code Manager advised that they may need to wait to get the final position to ensure they have fully understood all the parts and drivers of them. There is a balance to be struck in that the Code Manager does not wish to communicate too soon before the complete picture is understood, but equally they do not want to wait too long either.

The Code Manager acknowledged the concerns surrounding the PAB decisions and committed to undertaking an impact assessment to ensure that the PAB is fully appraised of the impact and whether there is any significance to it.

The PAB Chair queried the timeline for this to be resolved, and when the Code Manager would expect to come back to the PAB with an update. The Code Manager advised that progress would vary depending on when the data is fully received. Once received, the Code Manager will work through it but would expect to come back to the PAB with an update on all of the actions presented at the September PAB meeting.

The PAB:

- **NOTED** the potential issue noted with reports from CSS during MHHS Legacy Assurance, and the further verbal update provided during the PAB Meeting by the Code Manager.
- **APPROVED** the following for Parties that have not provided the Legacy Assertion by 08 September 2025:
    - In the case that the Party is a Supplier, an Escalation PAT will be applied to refer the Party to Ofgem.
    - In the case that the Party is a MOA, the Code Manager will notify the Supplier(s) that have appointed the MOA that their agent has not completed the assertion.

NEW ACTION: The Code Manager to update the PAB on the impact of the CSS Reporting Issue discussed under agenda item RECPAB_25_0826_04 on any PAB decisions and processes.

4. DATA ERROR RESOLUTION PROCESS

The REC Technical Services (RTS) Code Manager presented the PAB with an update on the Data Error Resolution Process arising from the PAB action (RECPAB_24_0924_02). PAB were updated on the steps that have been taken since the action was agreed, including the development of requirements to inform the design of the process. The Code Manager also advised PAB of the two-phase approach that it intends to proceed with to enable delivery of the process.

Several PAB Members noted that they found the paper helpful and informative. A PAB Member queried whether the RTS Code Manager had any examples of historic issues that would have been beneficial from going through this data resolution process, such as the CSS issue covered in the Qualification update. The RTS Code Manager noted that they are hoping this process would align to that issue in terms of discovering the impact of what they refer to as the 'blast' radius of the issue to determine who is impacted by the issue and who owns the data and so forth. The RTS Code Manager informed PAB that they would like to look at some previous examples of data issues, and the CSS issue may be a prime candidate.

A RECCo representative advised PAB that this is exactly the sort of issue that RTS are expecting the process to log, track and that the actions are recorded to ensure the PAB are kept up to date with the progress of those. The RTS Code Manager advised the PAB that they have a log of three separate issues that they want to use as a test case as part of phase one to design and build out the process to ensure this is all captured in the log.

The PAB Chair suggested that PAB Members provide feedback on the process as outlined in Appendix A of the paper through the PAB Member collaboration space. The RTS Code Manager requested this within 10 working days from when it is shared to ensure all feedback is captured.

A PAB Member queried in the event the data item sits outside of the REC, whether there is a process to hand it over to another code to resolve. The RTS Code Manager advised they were investigating this as part of phase one, with particular attention to how this would be logged and tracked. The PAB Chair noted it would ideally be maintained on a cross-code basis and invited comments from the SEC, BSC, and UNC representatives.

The SEC Representative noted that a lot of their issues are dealt with by an operational subgroup, given that their SEC PAB is not up and running at this point but that this is subject to change. The SEC Representative advised that they do have a methodology for dealing with errors but that there is no reason why as part of this collaboration that they can't develop something that the SEC PAB will be able to look at and deal with to harmonise with the PAB's approach.

The BSC Representative noted that they would have to look into exactly what they do have and how it all fits together, but in principle, they are supportive of a joined-up approach with a clear pathway, and that it is something they would support taking forward.

The UNC Representative advised that they do not have a formal process for addressing data errors currently, but where Parties are aware of data error issues they are audited to give the assurance that

they are providing performance information which is correct. They support the pooling of information and resources, and agreed this would be helpful.

The PAB:

- **NOTED** the proposed Data Error Resolution process ahead of initiation of phase 1 (process design); and
- **DISCUSSED** the proposed process and offered guidance on any notable improvements.

NEW ACTION: The Code Manager to update PAB on the shortlisted log of issues for which the data error resolution process will be used and seek PAB feedback via the REC PAB collaboration space on the REC Portal.

5. RTS DEEP DIVE

The Code Manager presented the PAB with the findings of its recent deep dive into the REC Technical Services (RTS) Code Manager's role, following the previous deep dive in July 2024. The deep dive focused on three key areas to highlight the purpose and aim of the service, and the paper presented several recommended actions for RTS / RECCo to undertake.

The Code Manager explained that they looked at RTS' role in the REC digitisation strategy and how they help to record, update, and operationalise that strategy through their role, specifically in technical assurance. In addition, the Code Manager look at how tools that RTS provides, such as 'Erin' (the REC Chatbot), and how they are being utilised by REC users and how the initial feedback is taken onboard to develop that tool further. The Code Manager also looked at how RTS have dealt with some data management issues that have arisen from external sources over the last few months.

The Code Manager outlined the actions that are highlighted in the paper. The Code Manager referenced the technical assurance role of the RTS Code Manager, and how they guide Service Providers on what testing they are doing and what might be beneficial. However, they do not currently have concrete powers to be able to enforce Service Providers to undertake additional testing. The Code Manager believes they could empower RTS to be more robust, including through the use of the REC Committees.

The PAB:

- **NOTED** the update and the recommended actions resulting from this deep dive.

6. PARTY ASSURANCE UPDATE

The Code Manager presented an update to the PAB on Party Assurance as part of the active cycle month. Additional updates were provided on the Annual Rating 2024-25 process and the Theft

Detection Incentive Scheme Debit/Credit calculations. The Code Manager also informed PAB of a potentially non-compliant third-party disconnection following a tip off from a MEM.

The Code Manager informed PAB that a MEM has informed the Code Manager that it was asked by a Supplier to update the details of the energisation changes for meters where a third-party had carried out the work, and the MEM was uncomfortable in communicating changes it had not carried out itself. The MEM has confirmed to the Code Manager, based on the information available to them, that this work was not carried out in relation to revenue protection as allowed under the REC. The Code Manager does not have additional information and therefore proposes confirming that the third-party carrying out the meter works hold suitable accreditation as required under the Code.

The Code Manager informed the PAB that they had asked the MEM for additional information on the Supplier and the third-party but that at this stage, the MEM was unwilling to voluntarily disclose this information. Therefore, the Code Manager is seeking approval from the PAB to allow them to apply an Information Request PAT to the MEM, which seeks further detail on the Supplier involved and the MPANs concerned. This would enable the Code Manager to reach out to the Supplier via an Information Request PAT to seek information to determine where the works that were carried out were completed by an accredited REC Party to alleviate any potential safety concerns.

The Code Manager noted that in the event the third-party is not accredited, they would bring further escalations to the PAB for approval to ensure that the third-party is not carrying out further meter works that they are not qualified to do. This would also help ensure Supplier(s) are only using qualified REC Parties to carry out metering works as per their REC obligations.

A PAB Member queried whether the Code Manager had any indication on whether the Supplier in question is a large or small Supplier. The Code Manager reiterated that the MEM had not shared any further information at this stage other than what we have already shared with PAB. The PAB Member questioned whether, at the end of this, if proven, would the Code Manager inform Ofgem given this would be a licence issue as well. The Code Manager noted that while they have not proposed next steps at this stage, they intend to identify what the issue is first, with an update to the PAB next month on their findings and proposed next steps.

Another PAB Member noted their concerns that this may have repercussions for the MEM once they provide the information to the Code Manager as the Supplier concerned will know it had come from them and may take action with regards to the MEM as a result. The Code Manager advised the PAB that they wouldn't tell the Supplier who has made the disclosure but the Supplier may be able to determine it themselves. Therefore, the Code Manager invited the PAB's input on how the safety risk can be balanced with risk of retaliation against the whistle-blower.

The MEM representative agreed with the concerns raised by the PAB Member that it could potentially expose the whistleblowing MEM, however, if they have raised these concerns but were unwilling to give any information, it makes it impossible for the Code Manager to deal with their concerns. The PAB Member agreed but noted that it might be worth understanding why the MEM has refused to give the

Code Manager the information. They noted that this may be due to the fact they refused to undertake the updates, or that they did the updates but weren't happy to do it. The Code Manager noted that Suppliers do not have the ability to send the required D flows, and that those must come from a MOA and currently the MOA states their unwillingness to send the required market messages.

The Code Manager suggested to balance concerns from PAB, in their Information Request to the Supplier, they could make it more general on processes rather than on specific MPANs to try and veil the request. A PAB Member queried whether the MEM has approached the Supplier to note their concerns. The Code Manager believed the MEM is in touch with the Supplier and that is where the disagreement in responsibility to update other market participants has arisen, but clarified this had come as a query via their OAM, where the MEM sought to confirm their understanding that there were no obligations under the REC for the MEM to take actions to update the Energisation Status. The Code Manager clarified to the MEM that the REC was clear that a MEM is required to communicate the updates after it had completed meter works, and that any work needs to have been undertaken by a REC accredited MEM, although this does not need to be the appointed one as the MOA. For instance, works could have been conducted by a third-party as long as they hold the REC accreditation such as an Electricity Meter Operative (EMO) who would normally rely on a MOA to communicate the change via DTN messages.

The Code Manager advised the PAB that if they determined that applying an Information Request to the MEM at this point was not the best way forward, they could attempt to informally engage with the MEM to try and understand what has happened since their initial concerns were raised to see if they are willing to engage. However, the Code Manager reiterated their concerns around safety and how long this matter could be left.

A PAB Member noted that the PAB now had an obligation to do something about the concerns that have been raised, especially from a safety perspective. However, they noted that the Code Manager could potentially send communications to all Suppliers to advice that these concerns had come to their attention and to issue a 'gentle reminder' of the REC obligations to use REC accredited Parties for this work, and that going forward, it would be an area that the Code Manager would be checking going forward.

The Code Manager advised the PAB that if agreed, this is something they could do through the REC Issues Group (although attendance is small) or through direct communications to all contract managers and their alternatives. Another PAB Member suggested that, if agreed, it would perhaps be worth tailoring the audience down to those Suppliers who use that MEM only without saying it has come from them, to assist the Code Manager in narrowing the contact list down. The Code Manager confirmed this could be done using GES and EES data.

A RECCo representative queried whether this would have the same consequence of contacting the Supplier directly and them thinking that the MEM has been in contact anyway without necessarily being given more detailed information. They clarified that the approaches available to the PAB were either a general approach or in receiving the specific information and acting on it robustly.

DRAFT

A PAB Member noted their concerns that to write to all Suppliers would be too broad and that the MEM should substantiate this allegation. They queried whether the MEM may have been potentially asked to undertake the works concerned but the cost did not align for the Supplier or another similar situation, hence the need for the additional information. The PAB Member reiterated the importance of receiving the information from the MEM and noted that they do not believe writing to all Suppliers would get the Code Manager any further forward.

The Code Manager noted that the PAB should determine the way forward based on the options discussed. The MEM representative suggested the Code Manager should approach the MEM informally once more and advise them that if the information is not provided informally, then a formal Information Request PAT would be applied which may encourage them to engage with the Code Manager.

The PAB Chair sought to summarise the position and bring the discussion to a close, in that the PAB wished for the Code Manager to go back to the MEM informally in the first instance before a more formal Information Request PAT was issued. The Chair noted that where the Code Manager becomes aware of something that involves safety concerns, there is not a 'do nothing' option available and now that the MEM had made them aware of it, they are required to act.

The Code Manager noted the decision of the PAB to approach the MEM informally before a more formal Information Request PAT is issued. They would seek to ascertain whether, even though the work was completed by a third-party, that third-party is a REC accredited Party. In the event the Code Manager is unable to confirm this, they would then seek to issue the Information Request PAT to the Supplier as agreed.

On the topic of recurrence of issues during switching due to incorrect MDD updates from Elexon, the BSC Representative noted that they would provide the PAB with a full update in September.

The Code Manager updated the PAB on the Theft Detection Incentive Scheme (TDIS) figures further to the information contained within the paper, as the final figures were published at the end of the previous week, after the PAB papers were published. All pots have shown an improvement in year-on-year performance. While total thefts still remain below target, it was interesting to see how some of the targets had been achieved or the split by smart vs non-smart. The Code Manager explained that in target setting for the current TDIS year, they had already spotted that Gas Domestic was getting close to the target point and that the Gas Non-Domestic Target continued to be the lowest performing target. The Code Manager highlighted that the PAB recently approved the movement of some of the Gas Non-Domestic target into the Gas Domestic Target which will help to alleviate this situation.

The PAB:

- **APPROVED** the application of an Information Request PAT to the MEM if it does not voluntarily provide further information to support further investigation.
- **APPROVED** the application of an Information Request PAT to the Supplier against whom the tip-off is being made.

- **APPROVED** the application of the PATs as set out in Section 6 of the Party Assurance paper.

NEW ACTION: The BSC Representative to provide an update to the PAB in September on the MDD update issues impacting switching as detailed in RECPAB_25_0826_07.

7. CRS PERFORMANCE CHARGE

The PAB considered a report from the Code Manager in relation to the Performance Charge for the Central Registration Service (CRS) for the period from 01 April 2025 until 30 June 2025.The paper detailed the breakdown of the charge for PAB to consider.

The Code Manager reiterated that they aim to ensure that metric failure that has a significant risk is more weighted than those metric failures that tend to have a lower risk. The Code Manager highlighted that within this particular paper, the CRS provider failed some user support metrics and the responsiveness metric, leading to the Performance Charge outlined.

The PAB:

- **APPROVED** the Performance Charge applied to the CRS Provider for the quarter ending on 30 June 2025 in line with the REC Performance Charge regime introduced from 1 April 2023 and the Performance Charges scale approved by PAB in March 2025.
- **NOTED** that no exemption request was submitted by the CRS Provider for this period.

8. PERFORMANCE ASSURANCE OPERATING PLAN

The Code Manager updated PAB on the Operating Plan, detailing the actions taken in the final month of the current Performance Assurance Operating Plan (August 2025). The Code Manager also presented an update to PAB on the PAOP for 2025-26 further to last month's feedback and subsequent consultation with Parties and sought approval for the PAOP as presented.

The Code Manager advised PAB that following feedback from the last PAB meeting, the PAOP 2025-26 was updated and issued for a 10-working day consultation. Following the consultation responses, the PAOP did not require to be changed, with respondents either endorsing their support or informing the Code Manager to be cognizant of certain things that may be ongoing, as documented in the Appendix.

The Code Manager advised the PAB that, if approved, the PAOP will be published on the REC Portal, as well as the consultation responses and the Code Manager's response to them to show that they have taken the feedback into account.

DRAFT

A PAB Member noted their concern with the response to Q5 by DCC in that they did not have visibility of all activities that the PAB did, or that they found the process challenging. The PAB Member believed the PAB had good dialogue with the PAB and had their regular involvement at meetings. The Code Manager advised they believed that DCC were reflecting on when the deep dives were introduced in the previous year, in that DCC felt that they weren't consulted while planning for those. However, they have since found them really useful and have commented on that within their consultation response.

The Code Manager also highlighted that DCC is the only party subject to these arrangements that does not have representation on the PAB, contrasting with the SEC where they do have representation. The Code Manager suggested that between now and the code licence award, it may be a point worth considering whether DCC should have representation. PAB Members agreed with this.

A RECCo representative stated that they believed the DCC response was more around timings, ensuring there was sufficient notice and resourcing of activities. The RECCo representative noted that this point may need some further discussion around a longer lead time, as while a month can seem like a long lead time, when it comes to considerations around resourcing, capacity, and the required level of detail, it may not be sufficient.

A PAB Member queried as to whether DCC had an Operational Account Manager (OAM), to which the Code Manager confirmed they did.

The PAB Chair noted it was a valid point on DCC representation given the odd situation that has arisen where they are essentially a Service Provider but without a contract in place, therefore there is a reliance on them being a Party to the Code. The PAB Chair advised that concerns around this had been raised with Ofgem, as well as concerns around the DCC 2 arrangements in that it makes very little reference to switching and CRS arrangements. The PAB Chair explained that there is also a concern that DCC will not be finished their current improvement plan by the time the licence is renewed for DCC 2. There may a broader piece of work to look at what more the PAB could do to improve the set of arrangements to provide clarity around the status of DCC.

The Code Manager emphasised that there is more than a month's notice provided to DCC of performance assurance activity, and that there is wide engagement with DCC, including regular discussions before planned work is formalised in documents and papers a month in advance. The Code Manager noted that while these arrangements are well established for routine assurance work, where issues spring up such as the CSS discrepancies, it is necessary to investigate immediately and not something that can be planned for months in advance,.

The SEC representative advised the PAB that on the SEC PAB, they do have a DCC representative. They also noted that they are going to be obtaining data from DCC for reporting to their PAB, and additionally, will be applying assurance on to DCC as an organisation. The SEC representative emphasised that they will have a link to DCC under three different 'hats', and that while it is an intricate relationship it works well and they would be happy to facilitate a discussion with the PAB Chair to talk

through how this works in practice. The PAB Chair agreed a discussion would be useful and worth revisiting once the SEC PAB is up and running.

The PAB:

- **APPROVED** the Performance Assurance Operating Plan (PAOP) 2025-26 presented in RECPAB_25_0826_09A for publication along with the responses to the Category 3 consultation feedback presented in RECPAB_25_0826_09B.

NEW ACTION: The SECCo Representative to share insights on DCC's role and separation of responsibilities within the SEC PAB to inform any REC PAB consideration of how DCC might have appropriate representation at the REC PAB.

9. AOB

The PAB Chair advised that RECCo had responded to Ofgem's consultation on extending Data Best Practice Principles to Code Bodies and a copy of the response can be found here. The Chair advised that the REC had already began the work to embed these principles, including through the Data and Digitisation Strategy. The Chair committed to providing more visibility to the PAB in due course on the impact this will have on the strategy and other ongoing work.

The Chair advised the PAB that RTS were already reviewing the Data and Digitisation Strategy and encouraged PAB Members to engage with the review process, and asked Members to contact the Chair directly to ensure these discussions are arranged.

The Code Manager reminded PAB Members that the next meeting of the PAB will be in-person, with details to follow in due course.

10. NEXT MEETING DATE

The next meeting of the PAB will be held in-person on 30 September 2025.

DRAFT