MEETING MINUTES

MEETING	**RECPAB_25_1028**
DATE	**28 October 2025**
LOCATION	**Online**

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
Shiv Singh	GT Representative	SS	PAB Member
Simon Waltho	BSC Representative	SW	PAB Member
Alice Williams	Citizens Advice Representative	AW	PAB Alternate
Zubair Iqbal	Ofgem	ZI	Ofgem Observer
Cristina Ullastre	Ofgem	CU	Ofgem Observer
Shelley Rouse	Code Manager	SR	Operational Account Manager Representative
Walter Carlton	Code Manager	WC	Performance Assurance Partner
Andrew Waghorn *(for items 10 to 13 only)*	Code Manager	AWa	Performance Assurance Analytics Lead
Vaishnavi Campbell-Sharma	Code Manager	VCS	PAB Secretary
Tom Stewart	Code Manager	TS	Performance Assurance Analytics Manager
Daniel Rodgers	Code Manager	DR	Performance Assurance Manager
Aleksandra Maczka	Code Manager	AMa	Performance Assurance Team Member
Alex Halkyard	Code Manager	AH	Performance Assurance Team Member
Anna Weeks	RECCo	AWe	Service Manager
Andres Alvarez (*for items 4 and 5 only*)	RECCo	AA	Senior Service Delivery Manager (Enquiry Services)

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Attendee	Representing	Initials	Role
Sarah Mower (*for item 5 only*)	C&C Group	SM	C&C Group Client Senior Relationship Manager
Bilal Ali (*for item 6 and 7 only*)	DCC	BA	(Interim) Director of Customer Relationship Management
Sodiq Lawal (*for item 7 only*)	Code Manager	SL	Service Provider Assurance
Mark Pearce (*for items 8 and 9 only)*	Code Manager	MP	REC Technical Services Lead
Eve Marriner (*for item 8 and 9 only*)	Code Manager	EM	Operational Account Manager
Carl Dennis (*for item 8 and 9 only*)	Code Manager	CD	Operational Account Manager
Kev Duddy (*for item 9 only*)	Code Manager	KD	Operational Account Manager
Sandbox Party Representative 1 (*for item 9 only*)	Party Representative	CB	Representative
Sandbox Party Representative 2 (*for item 9 only)*	Party Representative	JO	Representative
Next Generation Utilities Ltd Representative (*for item 8 only*)	Next Generation Utilities Ltd	PB	Representative

1. APPROVAL OF PREVIOUS MINUTES AND REVIEW OF ACTION LOG

The Chair welcomed attendees to the meeting of the PAB. Apologies were received from Beth Procter, SEC Representative.

The PAB unanimously **APPROVED** the actions and draft minutes from the PAB meeting held on 30 September 2025. PAB Members reviewed the open and overdue actions. Ten 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. ANNUAL STAKEHOLDER SURVEY

RECCo invited PAB Members to complete the Annual Stakeholder Survey to provide feedback on REC Services and inform their priorities for 2026-27.

PAB Members:

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- **COMPLETED** the survey.

3. SERVICE PROVIDER ASSURANCE UPDATE

The Code Manager presented an update on the performance of REC Services and advised a more comprehensive update will be presented next month as part of the 'active' review cycle.

The Code Manager provided an overview of the CSS-ESS data misalignment issue that had identified a number of MPANs as mismatched between EES and CSS. The three pots are as follows:

- **Pot 1** – Instances from initial data population for CSS (at the time of CSS 'go live'), where for some MPANs, more than one active registration record exists. The Code Manager noted that the correction of this pot sits with DCC to enact. DCC is awaiting a decision from RECCo on what the correct resolution date for these should be, with several alternative approaches being considered.
- **Pot 2** – Instances where the Suppliers have not deregistered disconnected MPANs from CSS. These are being addressed through the November REC Release which introduces timescales for Suppliers to deregister disconnected MPANs. Suppliers have been provided with a list of MPANs that the Code Manager received from DCC as of 2 September 2025, and they are being asked to work through these. This is being supported by the OAM team, primarily to see if any Suppliers have particular MPIDs with no live CSS connections, or there is no Supplier at the other end. Once these are collated, there is expected to be activity for DCC to support, with agreement from RECCo.
- **Pot 3** – Instances where the root cause for misalignment remains unknown. The Performance Assurance team are waiting for DCC to share an extract of all records within CSS to compare with the EES data the Code Manager has access to identify the list of misaligned MPANs for DCC to investigate. The CSS extract is pending a commercial and data sharing agreement between RECCo and DCC.

A PAB Member questioned a specific MPAN that their organisation has been discussing with Ofgem over a lengthy period of time, seeking approval on what they can share with Ofgem relating to the above issue and the discussions that the PAB have had on this. The PAB Chair advised that as the Ofgem representatives are present in the meeting, there are no issues with the PAB Member sharing the papers or referencing them if it is helpful for their discussions.

A PAB Member raised concerns around GES and their Service Providers. The PAB Member flagged that it often takes a prolonged time to resolve issues and that the Service Providers don't seem to be able to get to the root cause of things. The PAB Member queried whether there were any other avenues that RECCo could explore to achieve improvement of the service, other than having to manage the team very tightly on this.

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The PAB Chair noted they were aware of this being a problem, but advised that any fixes would also have to consider the associated price tag, and that where some fixes are possible, the costs may outweigh the benefits. The PAB Chair also noted that there are ongoing discussions around how to procure these services in the future. While nothing more could be shared currently, the PAB Chair will provide an update to PAB once plans have developed sufficiently.

Another PAB Member queried whether there is potential to bring GES and EES together, an idea with support within the industry. While acknowledging the PAB Member's point, the PAB Chair reiterated they were limited in what could be said currently as there are commercial considerations to take into account.

The Code Manager flagged issues arising in connection with EES Go Live for MHHS in September. This was picked up by the Code Manager's involvement in hyper-care activity. There were also some relaxations agreed between RECCo, and the EES Provider to accommodate the MHHS release. The EES Provider had not reported any performance drops despite the issues arising and the Code Manager is exploring with the Service Provider whether this is indicative of any misreporting. The Code Manager also highlighted that drops in performance were noted previously post-release of changes within CSS, GES, and now with EES indicating a need for review of pre-release technical assurance (see further details in section 5 below).

The Code Manager also noted the GES Data Latency update that was an action arising from the GES Deep Dive to come up with long- and medium-term plans (see further details in section 4 below).

The Code Manager referenced the CRS Improvement work that commenced in December last year, with an action taken from the PAB to consider how DCC are incentivised. In terms of implementing efficiencies, this is expected to be built into the CRS Improvement Plan, which was agreed between RECCo and DCC. Ofgem are supporting this review of CRS governance and operating model to be undertaken by RECCo and DCC, with a view of addressing PAB's concerns regarding incentivisation. The Code Manager advised the PAB that DCC were attending later in the meeting to provide an update following the re-baselining of the CRS Improvement Plan as requested by the PAB at a previous meeting (see further details in section 6 below).

The Code Manager noted that the actions from the Ofgem review are currently progressing through the change process in R0280 which was recently approved by the Change Panel.

The PAB:

- **NOTED** the update.

4. RECCO UPDATE ON GES

As per action RECPAB_25_0729_04, a representative from RECCo presented an update on the medium- and long-term plans to tackle the persistent issues relating to the Gas Enquiry Services (GES),

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outlining the current status of the work in progress. The paper also included an update of any potential impact of Project Trident on the GES service.

The RECCo representative introduced the paper and spoke through this, with section one of the paper looking at the background and context to the data latency REC Change that was raised around eight months ago, and section two focusing on specifically how the SLAs are changing.

A PAB Member commented on the GES Service Provider generally having many problems and delays, and consequently large costs. The PAB Member queried whether REC could get better value for money for consumers and sought the RECCo representative's thoughts on this.

The RECCo representative agreed on the principle of securing best value for the industry. They explained that issues over the past few years are linked to data latency which are now being addressed, but also challenges with the system being cloud native. While potential changes are discussed with the GES Provider, these changes may not necessarily extend to the technology side of the service if they are cost prohibitive or not representing value added for participants. There is a prioritisation process to determine the most important projects to progress for continued evolution of the service.

The PAB Chair noted an action to arrange an update from RECCo to provide a later update on the service evolution thinking around the Enquiry Services, and potentially, IT services more generally. This may not be possible before the end of the year, but the PAB Chair recognised that this topic drives a lot of concern amongst Parties as ultimately these services are dependent on data and IT.

The RECCo representative provided a brief update on Project Trident, an Xoserve-led programme under the UNC, focusing on modernising the UK Link system that is being phased out of its current platform, with a suitable replacement being sought. Due to the dependencies and significance in the data available to the GES, it is important for the REC to have visibility on this. An offer had been extended for a dedicated stakeholder engagement lead for Project Trident at Xoserve to provide a more detailed update to the PAB on the Project, its procurement, the associated timelines, and how it relates to the GES. The licence and maintenance for the UK Link system ends on 31 December 2027 but that there is an extended maintenance package available to 31 December 2030, with all communications from Xoserve suggesting an aim for the 2030 deadline.

The PAB:

- **NOTED** the update.

NEW ACTION: The PAB Chair to arrange for RECCo to provide an update to the PAB on the Service Evolution for the Enquiry Services, based on the feedback received during the RECCo Update on GES (RECPAB_25_1028_04).

5. RECCO UPDATE ON EES PERFORMANCE ISSUES

SM joined the meeting.

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A RECCo representative presented an update to the PAB on the EES performance issues that had been experienced during the recent MHHS transition period in September and October.

The issues included some users being unable to log into the service on 22 September, and a planned outage, with Parties having read only access, during the weekend of 19-21 September. These issues were due to a configuration problem that was introduced during M10 cutover. It was fixed quickly, with an emergency patch that was progressed and implemented by C&C Group. The cutover outage was planned and approved in advance, and was part of the M10 change work. Specifically, the login issue meant that some users could not submit searches or use services like SDEP, and login failures meant that some activity wasn't captured in the monitoring data for the cutover period. The API and Portal were down for the agreed period, but the API was down for longer than expected, although no SLAs were reported as breached.

There had been lessons learnt, with new processes and initiatives implemented including:

- Improved portal resilience and monitoring
- Strengthened user support and escalation during major changes
- Improving data capture (so that even failed login attempts are captured in the future)

The October issues occurred from 1-10 October, where the API and portal experienced slower response times, timeouts and logouts were caused by a database issue after a recent system update and server reboot. The Central Switching Service (CSS) was not impacted during this time.

The RECCo representative outlined the lessons learnt and process improvements including:

- Extra monitoring
- Improved communication protocols
- Raised a direct change to prevent similar database risk in the future

The representative advised the PAB that a more detailed update, covering the associated SLA impacts from the October period, would be provided to the PAB in due course.

A PAB Member thanked the RECCo representative for their update, and for resolving the issue quickly and keeping people informed. The PAB thanked all involved for their hard work and efforts.

Another PAB Member queried whether it would be possible to get more frequent updates via the website in the event a situation occurs like this again, as the updates hadn't been very frequent. The C&C representative advised that this was raised as part of the lessons learnt and is something they would endeavour to do.

The PAB:

- **NOTED** the update.

AA and SM left the meeting/

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6. CRS IMPROVEMENT PLAN RE-BASELINE UPDATE

BA and ML joined the meeting.

A DCC representative presented a further update on the CRS Improvement Plan following the re-baselining exercise that had taken place since the last PAB update in July. The PAB considered the update and confirmed it wished to continue receiving quarterly updates on progress against the plan. The Code Manager noted that the CRS Improvement Plan updates are scheduled quarterly.

The DCC representative provided a high-level summary overview of performance against the CRS Improvement Plan that DCC have been working closely on internally and with RECCo.

- All workstreams are on track to achieve the key milestones by end of March 2026.
- They have completed individual workstream deep dives to consider where the most value can be gained and which critical areas to focus on with resources to prioritise big deliverables. It was noted that this was completed over recent weeks and a baseline plan has been produced.
- Key risks have been fully reformed, and these can be shared outwith the meeting.

Workstream updates:

- Address Data Quality:
    - The pot has been reduced from 2.8 million to 2.4 million.
    - The best match rate to-date regarding Switching through introducing / adjusting the rematch tool and manual address matching improvements.
- Change Management:
    - A new process has been agreed with the aim of expediting and delivering small changes for the ultimate benefit of consumers, with tranches of up to £150k freed up for each small change.
- Engagement & Communications:
    - DCC are working closely with the Code Manager OAMs to improve the efficiency in how the PAB engage with the industry.
    - Reviewing template improvements across the incident process by taking industry feedback on how to improve related communications (also links to the Incident Management workstream).
    - DCC will be reviewing the outcomes of a recent industry survey with RECCo in due course to understand feedback relating to engagement.
- Reporting:
    - Initial work around the volume of reports that DCC creates and how they can be more efficient and provide the industry with the right level of insights. The current focus is on

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how reporting can help industry to drive action and also the best way to store these reports in services/cloud storage.

The PAB Chair mentioned the upcoming DCC Address Workshop in Manchester and the DCC representative encouraged those on the call to attend and to encourage those within their organisations to attend. The DCC representative noted the feedback from Parties seeking a virtual attendance option, and they will explore if this is possible, but encouraged face-to-face attendance to enable collaboration.

The PAB:

- **NOTED** the update.

NEW ACTION: The CSS Service Provider to provide the assumptions and risks used to define the CRS Improvement Plan activities and timeframes.

NEW ACTION: The CSS Service Provider to consider whether the upcoming workshop on CRS Address Matching can support remote attendance.

ML left the meeting.

7. CRS PERFORMANCE CHARGE RECALCULATION

SL joined the meeting.

The PAB considered a report from the Code Manager in relation to a Performance Charge re-calculation for the Central Registration Service (CRS) for the period from 01 April 2025 until 30 June 2025, further to the decision of the PAB in August 2025. The reason for this re-calculation was due to more performance level failures being identified than were previously reported by the CRS Provider.

The PAB:

- **APPROVED** the revised Performance Charges applied to the CRS Provider for the quarter ending on 30 June 2025, following the misreporting identified through the direct assurance over the self-reported performance metrics.

SL and BA left the meeting.

8. ROBOTICS SANDBOX UPDATE

EM, MP, and CD joined the meeting.

The Code Manager presented an update to the PAB following the approval of a Sandbox Application in May 2025 to grant a REC Party permission to use robotics in SDEP to trial bulk-resolution of cases. The paper updated the PAB following the further Impact Assessment that was carried out and outlined the indicative timescales for the trial to go live.

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As part of the Impact Assessment carried out by the Service Delivery Partner, timescales were now known for the Sandbox, which accounted for the required monitoring period and the backlog of work that needs to be undertaken in the prototyping for access suspension. The Code Manager advised the PAB that the likely start of the trial would be 30 November 2026, providing the necessary updates go without delay. The PAB will be informed of any slippage or risks that emerge.

The Chair queried that, in light of the Sandbox Application next on the agenda, whether the Code Manager has considered action to prepare the SDEP system for these kinds of applications rather than reacting to ad-hoc requests. The Code Manager agreed that over the longer-term, it is important to consider this as robotics applications may have limited life. The Code Manager noted that there is an ongoing discussion around potential improvements for machine-to-machine solutions for operating what are currently manual processes within SDEP, as part of a forward work plan.

The PAB:

- **NOTED** the update.

9. SANDBOX AND DEROGATION REQUESTS

JO, KD, CS joined the meeting

The Code Manager presented a Sandbox Application on behalf of a REC Party. The application relates to granting the REC Party a Derogation from the prohibition of using robotics in SDEP to facilitate a trial to deliver efficiencies in escalating consumer impacting switching expectations.

The PAB Chair noted a potential conflict of interest of a PAB Member who is also a representative of the organisation making the Sandbox Application. The PAB Chair determined that the PAB Member did not need to leave the meeting on the basis that the PAB Member excused themselves from the discussion and does not participate in the vote.

The Code Manager introduced the application, highlighting the aim is to unlock efficiencies and improve customer outcomes. The Code Manager noted that the PAB had previously decided that any new robotics would be rejected until the previously agreed Robotics Sandbox goes through.

The Supplier representative advised the PAB of the benefit of the programme and the benefit for customers. They pointed to the potential learnings and benefits of Robotics being trialled by more than one Supplier. They noted that it was their belief that it was unfair that they were being held up potentially by the actions of the Supplier who has had their trial approved.

The PAB Chair noted the concerns and invited PAB Members to discuss.

A PAB Member noted that anything that improves the outcomes and service for customers is worthwhile, as long as the PAB have a way to halt it, in the event it starts to go wrong. The PAB Member advised that they were sympathetic to the Supplier's request.

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Another PAB Member noted that SDEP is exceedingly slow and anything that improves it would be beneficial to everyone. They noted that putting Robotics on to the system may actually make it even slower and increase the volume of requests that the Supplier is raising which could overwhelm other Suppliers, especially those who do not have the infrastructure or resource to invest in Robotics, therefore having to deal with queries manually.

The Supplier representative assured the PAB that this would not lead to an uplift in the volume of queries. Instead, they advised they were looking to add value and allow their team to focus elsewhere. The Robotics would only be responding to requests that come through to them, therefore they do not believe it would add more queries onto the system.

A further PAB Member noted that as this was being developed on the live system, the impact on others is unknown at the moment. They queried whether the learnings would be available to everyone or just the Supplier who has applied for Robotics, or those who had developed it.

A PAB Member advised that there will be a need to operate multiple Robotics in the environment at some point given the fact that once the trial comes to an end, a lot of other Suppliers will likely want to emulate this solution, and it would result in multiple bots in the environment anyway. The PAB Member noted they were supportive of the previous PAB Member's suggestion.

The Code Manager and PAB Chair noted that Change R0161 will be coming in with the conclusion being that even where multiple Parties are testing the Robotics, this would need to be in a Sandbox before it goes into the live SDEP environment.

The Code Manager offered some ideas on how this may work in practice, including selected days for organisations to have access to the Sandbox.

A PAB Member noted that while there is appetite for the development of Robotics and there are some clear advantages, the PAB had previously determined to test it with one Supplier first before they let other Parties trial it. After that initial test, the PAB could add another Supplier, then potentially another, and another.

Several PAB Members raised comments regarding the SDEP system as it currently stands, noting that it is already slow and that they wish to avoid slowing it down.

The PAB Chair suggested delaying the PAB decision, with the Supplier representatives accepting the given timeline would be November 2026 for 'go live'.

A PAB Member suggested a policy position in general that would allow Parties to proceed with a Sandbox proposal in order that all Suppliers are treated equally and fairly.

The PAB:

- **CONSIDERED** the Sandbox Application received and the Code Manager's recommendations; and

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- **DEFERRED** the Sandbox trial and Derogation application to allow further refinement of the approach to respond to any forthcoming interest from other Parties.

NEW ACTION: The Code Manager to bring an updated Sandbox Application to the November PAB meeting which contains further information around how the Sandbox can be facilitated fairly for all Parties without unduly increasing the risk to the SDEP service.

NEW ACTION: The PAB Chair to review the principles and processes around approving Sandbox applications and provide an update at the November PAB.

PB joined the meeting. MP, CD, CS, and JO left the meeting.

The Code Manager presented a Derogation Application that had been received on 13 October 2025 from Next Generation Utilities Ltd. The Derogation related to permitting the transfer of the existing sealing pliers from Bespoke Metering Solutions Ltd to Next Generation Utilities Ltd. The Code Manager advised that both companies are undergoing restructuring.

The PAB Secretary advised this Derogation Application related to Bespoke Metering Solutions Ltd who are in insolvent administration and there is an item later to discuss their exit from the Code.

The Code Manager recommended that Next Generation Utilities ('Next Gen') Derogation be approved with the conditions of Next Gen accurately recording the chain of ownership of the pliers and ensuring that any assigned to engineers are currently not assigned to new operatives, which will be inspected at the next CoMCoP audit.

The Code Manager queried whether the Administrator appointed to Bespoke Metering Solutions Ltd had approved the transfer or whether the pliers went with the operatives when they were made redundant. The Next Gen representative advised that there was a temporary solution put in place, but that a number of pliers had been destroyed. The numbers of the destroyed sealing pliers and those retained are available as Next Gen have retained this information.

The PAB Chair pointed out that the key issue is the traceability of who did the work, hence the need for these sealing pliers to trace back to the operative and company. The Next Gen representative confirmed they were aware of this and will be able to identify the operatives. They advised they may use outdated pliers as they will be ordering new sets but are not yet replacing all of the existing ones. However, they assured the PAB that they would always be able to identify who carried out works.

A PAB Member queried who was responsible for the meter if there were issues. The Next Gen representative noted that this would be the engineer as each sealing plier is traceable to the engineer and that the individual would be challenged regardless of whom they were employed by.

The Code Manager enquired whether the transfer of employees from Bespoke Metering Solutions Ltd to Next Gen was covered by TUPE. The Next Gen representative confirmed this was the case.

The PAB:

APPROVED the Derogation Application as set out in the paper, for a maximum period of up to 2 years and recommended conditions.

NEW ACTION: RECCo to review the requirements around Sealing Pliers, as well as the market position and supply chains of manufacturers, for retail and consumer risks.

EM, KD, and PB left the meeting.

10. PARTY ASSURANCE UPDATE

AWa joined the meeting.

The Code Manager provided updates on Party Assurance, including on their investigation into the non-accredited organisation that had carried out meter point disconnections, the work to deappoint a MEM who is exiting the market, the default of a metering organisation that is in administration, and progress on work to improve the theft calculator. The PAB were also informed of a reportable security event, which was assessed as needing no further action.

The Code Manager were seeking PAB approval on two matters relating to TDIS so that processes are clear:

- One Supplier which had previously submitted 1340 format files had resubmitted all current year (2025-26) theft data in the correct 1341 format through the Portal. This meant that they had submitted data for the first three months of the scheme year outside of the required timeframe, so the Code Manager is seeking PAB approval for these to be admitted.
- One Supplier is exiting market segments and the previous portfolio disposal did not meet the "substantially all" requirement so was dealt with in a derogation for the last scheme year. They have now disposed of their entire portfolio. The majority of the disposal was via a trade sale, so the rules move obligations and any discovered thefts onto the acquiring Supplier. However, the exiting Supplier had one customer, responsible for 25% of their meter points (c. 5000 sites), that was not part of their trade sale and instead switched away. This switch happened after the trade sale as a regular switch, and the Code Manager believes Paragraph 3.8 should apply to the theft target and any reported confirmed thefts would move to the acquiring Supplier. The Code Manager is therefore seeking approval to enable this to be processed.

The Code Manager was also seeking approval to make a recommendation to the RECCo Board to expel Bespoke Metering Solutions Limited, a MEM that entered insolvent administration earlier in the year from the Code, in line with the Code processes. The PAB asked the Code Manager to write to the Party's administrator to inform them of PAB decisions relating to the Party in administration.

The Code Manager updated the PAB on the tip-off from a MEM about Parties potentially using non-accredited third parties to carry out disconnections. The Code Manager had investigated and determined this was a miscommunication rather than a Code violation as the Supplier contacts provided the MEM with details of incorrect agents, who were not meter-accredited, which had caused the

confusion. The Code Manager had now confirmed with the Suppliers that for any disconnections, both the organisation and the individual physically pulling the fuse must be a REC accredited Party. The Code Manager had confirmed the names of the organisations used and checked these against the Party Register to confirm compliance for both gas and electricity disconnections. The Code Manager has concluded that there are no further risks and thanked the MEM for their cooperation and diligence on this matter. The Code Manager confirmed the case was closed.

The Code Manager updated the PAB on the MEM who exited the market earlier this year. At the end of September, the Code Manager had identified thirty meter points across nine suppliers that still had the exited MEM appointed, with the majority being for gas. The Code Manager highlighted that a number of Suppliers had informed them of instances where they had started the process to get the new appointment of a qualified MAM, however, as the process needs to go through the shipper and then to CDSP, it is causing a hold up. The Code Manager advised the PAB that if this is not resolved by the end of the month, they would engage with CDSP and that they may also look into cross-code action to expedite matters.

A PAB Member highlighted that data inconsistences in gas are also being looked at as part of the I0196 working group. The Code Manager and UNC representative on PAB had agreed to feedback some of the symptoms they were seeing to the working group to help build the understanding of this issue.

The Code Manager also updated the PAB on the ongoing issues relating to a Supplier's lack of readiness to support MHHS migration and the September Code updates. At the last PAB meeting, the approved escalations had helped to get the Supplier to increase the resources in place and they now had a contingency plan delivered ahead of the M11 data. The Code Manager confirmed that they considered the matter to now be closed.

A PAB Member queried reports around a Supplier potentially entering administration. The Code Manager confirmed a notice was issued around 13 October to appoint an administrator, but they have not had confirmation of this yet. The Code Manager confirmed they were closely tracking the situation but that they had not received any updates from Ofgem at this stage. The PAB Member queried that once an administrator is appointed, whether the PAB / Code Manager would communicate with the administrator to ensure they understand the consequences for both the Supplier and the Code. The Code Manager advised that in the last SoLR event, they had been brought into discussions with the company administrator to clarify requirements around transfer of meter technical details, and would look to make contact with the administrator to explain their responsibilities and applicable processes under the REC.

The PAB:

- **APPROVED** the inclusion of theft data for the 2025/26 TDIS Year resubmitted in 1341 format by one Supplier who had previously submitted files in 1340 format.

- **APPROVED** the application of paragraph 3.8 for one Supplier exiting market segments, and hence, the transfer of the associated TDIS target and any confirmed thefts to be transferred to the acquiring Supplier.
- **APPROVED** the recommendation to the REC Board to expel the MEM that entered insolvent administration earlier in the year from the Code.

NEW ACTION: The Code Manager to reach out to the Supplier Administrator, when appointed, to provide them with further guidance on their responsibilities under the REC.

NEW ACTION: The Code Manager to write to the Administrator of the MEM in Administration to inform them about discussion at PAB in relation to:

- The MEM's expulsion from the REC; and
- The transfer of Sealing Pliers as part of the transfer of business to Next Generation Utilities.

11. DATA CLEANSE UPDATE

The Code Manager presented an update to the PAB on the Data Cleanse. This covered the conclusion of Sprint 4, with specific updates on Gas Invalid Map ID, which showed very limited progress, and the data items of Energised No Meter, New Meter Details and DNO Invalid Topline. The Code Manager also presented the proposed content and associated targets for inclusion in Data Cleanse Sprint 5, which had been informed by feedback from Parties through the recent PA Webinar and RIG Meeting.

The Code Manager was seeking permission for the approval of PATs as a result of the Sprint 4 outcomes on invalid Gas MAP ID. They had received indication that the MAMs who were required to do the cleanse activity have acted, but that subsequent updates have not been seen in the data held by CDSP. The Code Manager had spoken to Xoserve who believe there may be some blockages at the supplier or shipper level, thereby holding up the whole process.

The Code Manager explained that they were proposing two stages of PATs:

- Stage 1: To engage with larger MAMs to seek clarification on how many they have cleansed to allow the Code Manager to confirm if they have acted. The Code Manager will then take specific installations from within the six-month period and look at those where the MAP ID has not been populated to confirm if they had submitted the required data as per the right Schedule, and to get the reference information based on this.
- Stage 2: To engage with Suppliers with information from Stage 1 to directly ask about specific references and activities undertaken. This will assist the Code Manager in building an evidence base to understand where things are breaking down, and to plan consequent action to rectify this.

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The Code Manager provided an outline of the data items that were being included within Sprint 5. A PAB Member queried whether these items have been considered in the context of the MHHS transition as some of the items will become mute. The Code Manager assured the PAB Member on Invalid Topline Report that they were not considering these driven by the MTC (for instance) given it is falling away, rather, they are considering it based on factors that remain in the Topline going forward.

The RECCo representative advised that the PAB Member and Code Manager may wish to discuss this further to ensure feedback is considered. The PAB Member confirmed they would follow up directly with the Code Manager.

The PAB:

- **APPROVED** the application of the PATs as a result of Sprint 4 outcomes.
- **APPROVED** the content of Data Cleanse Sprint 5 and the associated targets.
- **NOTED** the new data cleanse report to be made available to Parties.

12. PERFORMANCE ASSURANCE FRAMEWORK UPDATE

The PAB considered a report from the Code Manager in relation to the outcome of the REC Risk Register updates discussed at September PAB and issued for industry consultation in early October. The report also covered the annual review of the Performance Assurance Methodology and Techniques (PAM&T) that had minor amendments.

The PAB:

- **APPROVED** the updates to the REC Risk Register.
- **APPROVED** the updates to the Performance Assurance Methodology & Techniques (PAM&T)

13. UPDATE ON RECCO BOARD DECISION ON A PARTY'S APPEAL

The PAB Chair reported that the RECCo Board had upheld a Supplier's appeal against the PAB's September decision not to include its confirmed theft submissions in the 2024/25 TDIS reconciliation. While acknowledging that the submissions were not made using the prescribed 1341 format, the Board found that the Supplier had acted in good faith by providing the necessary data via the superseded (but still active) file format. The Board concluded that procedural non-compliances in this case did not on their own warrant treating the data as wholly invalid and that inclusion best serves the aims of the scheme. The Board therefore instructed the Code Manager to recalculate the end-of-year reconciliation accordingly.

The PAB Chair reminded the PAB that when they made their decision in September, RECCo had not at that time obtained legal counsel. However, after the Supplier's appeal to the RECCo Board, legal advice was sought and an overview of this was provided in the paper from the PAB Chair.

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The PAB Chair advised that the revised reconciliation for the 2024-25 year will be issued to Parties in mid-November.

The PAB Chair noted that there were lessons to be learned by the PAB, while recognised that the PAB were not privy to the same information as the RECCo Board, namely the independent legal advice. The PAB Chair reiterated that the PAB should continue to be balanced and proportionate in their determinations

PAB Members thanked the PAB Chair for the update and noted that the PAB should therefore also be mindful of the impact on other Parties who will see their figures change from those previously communicated as a result of this decision. They also noted that they believe this may give precedent for other Parties to appeal to the RECCo Board whenever they do not like the decision of the PAB, or when they do not abide by the required process and format. A PAB Member expressed disappointment that RECCo had declined to seek legal advice when the matter was first raised and the legal advice shared seemed to be limited to a review of the legal opinion provided by the Supplier, rather than a more comprehensive analysis.

The PAB Chair noted that in relation to the impact on other Parties the PAB Member is correct that this would have an equal and opposite net impact as discussed in September, and as such, there isn't a detriment to other Parties on that basis.

The PAB Chair noted the important point around precedent and advised the PAB that they do not believe that a similar situation will arise in terms of technical issues around file formatting given that lessons have now been learned from this. The PAB Chair noted that the Supplier should have engaged with their OAM to flag this matter earlier, and as such, there will be lessons learned there too.

Another PAB Member queried whether the RECCo Board had placed any responsibility on the Supplier for the situation or whether there was any culpability from the Board or the Supplier. The PAB Chair advised that this was not debated and that the RECCo Board did not administer the blame or add any comment to this, noting it is not a black and white area. The RECCo Board determined that the data format was similar enough between the two issues. The PAB Member pointed out that the Supplier had also failed to engage during the year or fulfil its obligations for checking under the Code, and questioned whether the Supplier would learn from this and what was communicate to them in terms of narrative from the Board. The PAB Chair confirmed that additional comments were given to them, however, they were given in the correspondence outside of the appeal decision. The PAB Member noted their concerns that the Supplier party still hadn't changed their behaviour.

A PAB Member raised the point around communication with Parties and whether there was something that could be more innovative in how we message things that really matter / communicate with Parties, recognising that smaller Parties may not engage with the Code Manager as much as the PAB would have liked. The PAB Chair noted that generally, Parties do not pay much attention to TDIS until the reconciliation comes around.

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The Code Manager advised that they have commenced processing the re-run of the data and that this was currently going through the checking process. RECCo colleagues would also be involved, and that payments would be collected before Christmas before the distribution to Parties after Christmas.

The Code Manager has also initiated a lessons learnt exercise, in conjunction with RECCo colleagues, to avoid recurrence of a similar situation in future. The scheme needs to be fair to all Parties particularly as one individual Party can have an impact on every other Party. The scheme rules have previously been clarified and tightened significantly, following experience in the early years and at the behest of RECCo, so there now is a clearly defined process in the Code, including timetable and obligations on Suppliers. If these Code-defined rules and obligations are not enforceable, it will undermine the effective operation of the scheme in future. The legal advice obtained in this instance was acknowledged as being turned round quickly and based on the legal opinion provided by the Party rather than being a separate comprehensive assessment. The Code Manager emphasised the importance of obtaining a full legal view to avoid such challenges in future. The Code Manager will present the outcome of the lessons learnt exercise at a future PAB meeting.

The PAB:

- **NOTED** the update.

AWa left the meeting.

14. OPERATING PLAN

The Code Manager updated the PAB on the Operating Plan, detailing the actions taken for the month of October and the planned activities for the next few months.

The PAB:

- **NOTED** the update.

15. ESCALATIONS AND SDEP DEEP DIVE

The Code Manager presented an update to the PAB on the Escalations and SDEP Deep Dive that was approved as part of the 2025-26 Performance Assurance Operating Plan, following feedback from both the PAB and REC Parties. The PAB were updated on the proposed scope and activities of the Deep Dive, including an indicative timescale for their approval.

The PAB noted the initial feedback provided by Parties who had responded to the Code Manager's questionnaire, highlighting that while the majority were supportive, there was a strong minority who thought it was not helpful. The Code Manager clarified that the minority have had issues with how the escalations process are working – or not working – and that their thoughts are going to be included, including through interviews and further surveys to identify the pain points for those parties.

The PAB:

- **APPROVED** the proposed scope and activities of the Deep Dive on 'Review of Escalations and SDEP under the REC'.

16. AOB

The PAB Chair introduced a request from DCC to consider including representation at REC PAB, and that RECCo are engaging in conversations to assess the request.

The PAB:

- **NOTED** the update.

The Code Manager presented an approach to manage access to REC Services, in event of a Supplier of Last Resort (SoLR) with a view to ensure better outcomes based on lessons from the previous SoLR event earlier in the year. Whilst the SoLR process is under review through the REC Change Process, PAB were asked to approve the approach to allow time until Portfolio transfer was complete to allow the Failed Supplier to receive Loss Notifications from CSS to close out its wider obligations beyond the REC, in case a SoLR occurred whilst the change is in development.

The PAB:

- **APPROVED** the approach to manage access to CSS, EES and GES for the Failing Supplier to allow them to complete actions with other Code, Ofgem or as part of the wider administration process, as required.

NEW ACTION: The Code Manager to provide guidance at a future PAB meeting on the SoLR process and which elements that the REC Code Manager are responsible for.

NEW ACTION: Ofgem to clarify the impacts of retaining CSS access for a Failed Supplier until the portfolio transfer is complete in the event of a SoLR, as per Schedule 19 of the REC.

The Code Manager requested PAB Members confirm the date of 16 December 2025 for the in-person December PAB meeting.

The PAB:

- **CONFIRMED** the 16 December 2025 for the in-person PAB meeting.

17. NEXT MEETING DATE

The next meeting of the PAB will be held online on 25 November 2025.

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