MEETING MINUTES

MEETING	**RECPAB_25_1216**
DATE	**16 December 2025**
LOCATION	**In-person**

Attendee	Representing	Initials	Role
Dorcas Batstone	Independent Member	DBa	PAB Chair Alternate
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
Paul Everett	Supplier Representative	PE	PAB Member
Anne Jackson	UNC Representative	AJa	PAB Member
David Brown	MEM Representative	DBr	PAB Member
Fungai Madzivadondo	DNO Representative	FM	PAB Member
Shiv Singh	GT Representative	SS	PAB Member
Simon Waltho	BSC Representative	SW	PAB Member
Beth Procter	SEC Representative	BP	PAB Member
Alice Williams (*until item 7)*	Citizens Advice Representative	FBL	PAB Member
Shelley Rouse	Code Manager	SR	Operational Account Manager Representative
Walter Carlton	Code Manager	WC	Performance Assurance Partner
Anton Moden	Code Manager	AM	Performance Assurance Lead
Andrew Waghorn (*from item 6)*	Code Manager	AWa	Performance Assurance Analytics Lead
Vaishnavi Campbell-Sharma	Code Manager	VCS	Performance Assurance Senior Management
Daniel Rodgers	Code Manager	DR	Performance Assurance Manager
Bailey Robb	Code Manager	BR	PAB Secretary
Alex Halkyard	Code Manager	AH	Performance Assurance Team Member
Anna Weeks	RECCo	AWe	Service Manager
Eve Marriner (*for item 2 only*)	Code Manager	EM	Operational Account Manager
Derogation Party Representative (*for item 2 only*)	Party Representative	CW	Representative

Attendee	Representing	Initials	Role
Bela Ashworth (*for item 3 only*)	Code Manager	BA	Change Analyst

1. APPROVAL OF PREVIOUS MINUTES AND REVIEW OF ACTION LOG

The Chair welcomed attendees to the meeting of the PAB. Apologies were received for Jon Dixon, PAB Chair. In his absence, Dorcas Batstone kindly stood in as PAB Chair.

The PAB unanimously **APPROVED** the actions and draft minutes from the PAB meeting held on 25 November 2025. PAB Members reviewed the open and overdue actions. Six actions were closed following information provided in the meeting papers or via a verbal update.

In relation to action RECPAB_25_028_01, the PAB **AGREED** to move the meeting dates in March and May to avoid coinciding with half-term holidays. The PAB will now meet on 24 March (originally 31 March) and 2 June (originally 26 May).

Please refer to the Action Log for a full status update.

NEW ACTION: PAB Secretary to analyse the outstanding actions and the process of deferring actions. The PAB Secretary will update the PAB at the next meeting.

2. DEROGATION APPLICATION

EM and Party Representative joined the meeting.

The Code Manager presented a Derogation Application that had been received on 1 December 2025. The Derogation related to a request to recalculate the 2025/26 Theft Detection Incentive Scheme (TDIS) year targets for a Supplier Party, by adjusting the consumer segment type within their portfolio.

The Derogation was requested as the Supplier Party did not submit an adjustment through the existing derogation (RECDER_22) that allowed for correction prior to the Theft Target calculation.

The PAB:

- **APPROVED** aspects of the Derogation Application, including the timescales and recommended conditions.

EM and Party Representative left the meeting.

Following the PAB's decision, the PAB Chair Alternate raised a general concern with the theft process, with additional requests resulting from Suppliers not engaging properly with the theft process taking up PAB's time when the PAB could concentrate on more productive matters.

The Code Manager provided additional background on the Derogation Application approved by the PAB and advised that, on the wider point around theft improvement, they had shared a paper with RECCo on their thoughts on TDIS improvements and changes for RECCo to take forward.

A PAB Member queried what the impact of the Derogation Application was. The Code Manager advised that it moves the theft target from their non-domestic 'pot' to their domestic 'pot' which, given the respective size of the pots and corresponding TDV values, will benefit the Supplier. However, the Supplier is simply putting themselves back to where they would have been had they submitted the Derogation under the existing RECDER_22.

The Code Manager advised that this was the least disruptive way to make the required changes at this stage and would have minimal impact on other Suppliers. The PAB Member shared their concerns that the Supplier had failed to take up the derogation when it was available and did not respond to the follow-up reminder from the Code Manager prior to the calculation of the theft targets, noting that this late derogation request has placed additional burden on the Code Manager and others. The PAB Member queried whether the Code Manager could emphasise this view in the communication to the Supplier. The Code Manager committed to work with the Supplier's Operational Account Manager to ensure the communication is drafted appropriately.

3. R0280 – CSS CERTIFICATE AUTHORITY AUDIT CLARIFICATION – CHANGE REPORT (FINAL RECOMMENDATION)

BA joined the meeting.

The Code Manager presented the R0280 – CSS Certificate Authority Audit Clarification – Change Report (Final Recommendation) to the PAB as the responsible committee for the change.

A PAB Member queried if there was an agreed understanding of the term 'annual', noting previous different definitions across different codes leading to confusion across teams (i.e. calendar year). The Code Manager confirmed there was not a blanket definition contained within the schedules but would pick this up with DCC to establish what is meant by 'annual' to provide clarity around the timeframe.

The PAB:

- **APPROVED** the proposed change solution;
- **APPROVED** the proposed implementation approach; and
- **APPROVED** the proposed implementation date of 27 February 2026.

BA left the meeting.

NEW ACTION: The Code Manager to clarify and agree with DCC what 'annual' means in practice.

4. PARTY ASSURANCE UPDATE

The Code Manager provided updates on Party Assurance, including on a review of annulments, the proposed changes to the retail risk register, and the unqualified MEM appointments.

As per *RECPAB_25_1125 – Headline Report*, due to the timeliness for data submission, and the December PAB happening earlier in the month, performance data was not available in advance of the PAB Papers being published. A fuller update will be provided to the PAB at the 27 January 2026 meeting.

The Code Manager did update the PAB in relation to one DNO Party who had previously been issued with a Management Assertion. The Party continues to be above the threshold for this month but has not yet provided the Management Assertion as they have queried the data at this stage. The Code Manager has provided the unanonymised MPxNs to the Party for review and has also escalated with ElectraLink to understand whether the data may have issues. The Code Manager will provide a fuller update at the January PAB.

The Code Manager explained that the proposed amendment on Risk Driver 12.3 (Annulments) was due to the wide range in Party performance, with the proposal to reduce the threshold to 0.05 (5%) from 0.1 (10%). The RECCo representative queried why the original threshold had been set at 0.1. The Code Manager advised that there had been a range of workshops with the PAB at the outset to review market data and process levels, and there had been a drive to set consistent thresholds across switching, including on Risk Driver 12.3. If the proposal to reduce the threshold is agreed by the PAB, it would bring it in line with Risk Driver 12.1 and others.

The RECCo representative queried whether there had been any concerns with the level of activity that had driven the Code Manager's proposal. The Code Manager explained that there was currently a wide discrepancy in the use of Annulments, with some parties at 0.095 (9.5%) while others are at 0.005 (0.5%). As a result, no Party has been issued with a PAT given the current threshold, so it was proposed to amend it to understand why there are some outliers from the industry average.

A PAB Member queried whether dynamic thresholds may be better. The Code Manager explained that it had been communicated to Parties that where they are above threshold, the Code Manager needs to intervene, taking action based on current and previous performance on this Risk Driver and following the current approach of active vs. non-active performance months. The Code Manager also engages informally with Parties through PA Check-Ins where there are concerns with a Party's performance on specific Risk Drivers, but underscored the importance taking a balanced approach so that all Parties are treated equally.

The PAB:

- **APPROVED** the amendment to the threshold for Risk Driver 12.3 (Annulments), the addition of Risk Driver 11.1 (ETTOS Lead Matching), and the publication of the revised 'Risk Register v5.1'.

5. OPERATING PLAN

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

The PAB:

- **NOTED** the update.

6. NEW RISK DRIVERS – INTERACTIVE WALKTHROUGH

The Code Manager provided the PAB with an interactive walkthrough of the new Risk Drivers included within the recently approved Risk Register. This provided PAB Members with an opportunity to further their understanding of the six new risk Drivers, the background for their introduction, and the thresholds for market performance. The new Risk Drivers are:

- 7.27 – Supplier fails to appoint an appropriate Meter Operator Agent (MOA) for the relevant Market Segment.
- 7.28 – Discrepancies in MTDs held by the MEM and EES for MHHS-migrated Meter Points by Supplier portfolio.
- 7.29 – Discrepancies in MTDs held by the MEM and EES for MHHS-migrated Meter Points by MOA portfolio.
- 8.12 – A high percentage of Change of Occupier (CoO) flag use by a Supplier within Domestic Switch Requests indicates potential inappropriate use, which may increase the risk of errors in switching.
- 8.13 – A high percentage of Change of Occupier (CoO) flag use by a Supplier within Non-Domestic Switch Requests indicates potential inappropriate use, which may increase the risk of errors in switching.
- 11.1 – Party does not investigate leads from ETTOS.

The Code Manager provided an overview of Risk Drivers 8.12, 8.13, and 11.1 based on data that was available to them. The Code Manager then explained the background to Risk Drivers 7.27, 7.28 and 7.29. The Code Manager advised there was further analysis to perform before the thresholds for these Risk Drivers were set, including reviewing the overall market position and average as data begins to come through for these.

The PAB:

- **NOTED** the update.

7. CROSS-CODE RISKS AND INTERDEPENDENCIES (INTERACTIVE SESSION)

The Code Manager hosted an interactive session for PAB Members as part of the Cross-Code Risks and Interdependencies Deep Dive that was approved at the PAB Meeting in November 2025. In advance of the session, PAB Members were provided with a pre-read paper to allow them to consider key prompts in advance of the discussion.

The interactive session enabled PAB Members to develop their understanding of material cross-code risks that cut across retail energy market code boundaries and allowed them to identify and recommend risks to be prioritised through the Code Manager's ongoing Deep Dive.

The session was conducted in the room in three separate discussion points which PAB Member's rotated around, providing input on, before voting for their three top risk areas that should be considered as part of the Better Cross-Code Collaboration Deep Dive. The Code Manager also facilitated discussions online for those PAB Members attending remotely. The feedback and notes from the session will be fed directly into the Code Manager's Deep Dive.

The PAB:

- **NOTED** the interactive session.

8. AOB

In relation to the CSS and ESS data misalignment issue, the Code Manager sought PAB's approval, in principle, to share the data with the BSC to allow them to assess the impact of the issue. The PAB provided approval in principle. The Code Manager will check with both RECCo and DCC before any data is shared.

The PAB Secretary provided an update on behalf of the PAB Chair on the Ofgem consultation on the Change of Tenancy (CoT) process. The PAB Chair's slide set out that RECCo will participate in Ofgem's CoT working group and that it may be a potential new assurance area for inclusion in the REC Risk Register and PAOP. The call for input closes on 20 January 2026, with decisions targeted for Spring 2026, with any changes to the REC likely to appear in the 2026/27 PAOP as an emerging workstream.

9. NEXT MEETING DATE

The next meeting of the PAB will be held online on 27 January 2026.