RETAIL ENERGY CODE

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# INTERACTIVE SESSION PRE-READ – DISCUSSION ON CROSS-CODE RISKS


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| FOR DISCUSSION | PAB members are requested to read this paper ahead of the session, and consider the following prompts to prepare for the discussion on 16 December 2025:<br>• Where do you see obligations overlapping across REC, BSC, UNC, IGT UNC and SEC?<br>• Where do you see gaps or inconsistencies in performance of Code-governed market roles?<br>• Which market processes are most exposed to Cross-Code governance and/or interactions?<br>• Which risks would have high consumer or market detriment if unmanaged? |

## 1 INTRODUCTION

In line with the Performance Assurance Operating Plan, the Code Manager and PAB representatives from BSC, UNC, IGT UNC and SEC are conducting a deep dive on how we can achieve better Cross-Code collaboration. To support this deep dive, we are inviting PAB members to participate in an interactive session to discuss their views on Cross-Code risks.

### 1.1 PURPOSE OF THE SESSION

To enable PAB members to:

- Develop a shared view of material cross-code risks that cut across retail energy market code boundaries.
- Recommend those risks to be prioritised for further assessment, mitigations, or joint-Code assurance.
- Identify where existing assurance mechanisms interact or have the opportunity to interact to facilitate better Cross-Code outcomes.

## 2 FORMAT OF THE SESSION

Whilst we encourage all PAB members to attend in person, where they are unable to join the meeting in person, we will have a virtual break out room for the interactive activity. To give all attendees an idea of what to expect, we have explained the format of the session below.

### 2.1 RISK IDENTIFICATION – 45 MINUTES

We will ask PAB members to split into 3 groups and take turns to join the discussion on the following Code interactions:

- REC and SEC
- REC, SEC, BSC and DCUSA
- REC, SEC and UNC / IGT UNC

Spending c. 15 minutes on each Code pairing, we ask PAB members to capture risk areas, current Code interactions and potential detriment, populating the following template:

| Risk Area | Cross-Code Interactions | Potential Detriment |
|---|---|---|
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Here, PAB members are encouraged to consider failure modes, current assurance arrangements (including if there are any gaps or duplication between Codes), and next steps they may recommend.

## 2.2 RISK PRIORITISATION – 30 MINUTES

Once all groups have had the opportunity to discuss each Code pairing and identify and describe the risk areas, we will ask the groups to visit each Code pairing again. This time, each PAB member will have three votes per whiteboard, which they can assign to the areas they believe should be prioritised, whilst engaging in discussion with their group members. We will allocation c. 10 minutes per Code pairing for this exercise.

## 2.3 WRAP-UP – 15 MINUTES

The facilitator for each Code pairing will summarise the discussion, sharing insights and recommendations with the rest of the room. These will be further discussed and refined at the working group for the deep dive formed of Code representative.

# 3 CODE MANAGER RECOMMENDATIONS

To support discussion, the Code Manager has collated a list of potential risk areas for consideration, and mapped these with relevant Codes operating within the retail energy market:

| Cross-code area | REC | BSC | UNC / iGT UNC | SEC | DCUSA |
|---|---|---|---|---|---|
| **Switching Data Management** | X | X | X | X | X |
| **Timely resolution of meter faults** | X | X | X | X | |
| **Switch Meter Reads** | X | X | X | X | |
| **Accuracy of Meter Technical Details** | X | X | X | | X |
| **Electricity Market Data Specification** | X | X | X | X | |
| **Smart Meter installations** | X | | | X | |
| **Prepayment functionalities for smart meters** | X | | | X | |
| **Common service providers (DCC in their smart metering and switching roles)** | X | | | X | |
| **Passthrough processes for MDR appointments** | X | | | X | |
| **SoLR (especially considering interactions with DCC)** | X | X | X | X | |
| **Consumer consent** | X | X | | X | |

| Cross-code area | REC | BSC | UNC / iGT UNC | SEC | DCUSA |
|---|---|---|---|---|---|
| **MHHS Qualification** | X | X | | | |
| **Energy Theft outcomes** | X | X | X | X | |
| **Shipper obligations** | X | | X | | |
| **Market Sanctions via CSS** | X | X | | | X |
| **SIP accreditation** | X | | | | X |
| **New connections** | X | | | | X |