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PAB SANDBOX REPORT – DYNAMIC ELECTRIC METERING LTD – DATA FLOW SENDING SIP ACCREDITATION

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FOR DECISION 	This paper sets out a report to the Performance Assurance Board (PAB) on a Sandbox Trial Application received on 28 November 2025 from Dynamic Electric Metering Limited (DEML). The trial would allow DEML to perform the Safe Isolation Provider (SIP) requirements of Schedule 14 'Metering Operations' in relation to sending data flows, without the need to Qualify in other Party roles. The Code Manager requests the PAB to: • **REJECT** the Sandbox Trial Application as set out below.

1 BACKGROUND

1.1 THE SIP ROLE

The role of Safe Isolation Provider (SIP) was introduced to the REC via R0021 'Allowing REC accredited MEMs to de-energise and re-energise supply points independent of the Supplier' and R0101 'Revision of the Implementation Date and approved solution for R0021'. This role was created to allow a limited set of activities to be undertaken, at the request of the premise owners, without the need to use the Registered Suppliers' Meter Operator Agent (MOA).

These changes allowed Parties who held an existing MOA accreditation to send additional data flows specifically related to Safe Isolation Provider (SIP) works. However, it became evident that Parties who solely undertook the physical works as an Electricity Metering Operative (EMO), also wished to be able to contract for this type of work. R0270 'Clarification of SIP Qualification Requirements' will be implemented on 26 February 2026, allowing Electricity Metering Operatives (EMOs) to also become Qualified as a SIP and they are required to send SIP data flows alongside carrying out the physical works.

Currently there are 42 Parties Qualified to undertake SIP works and send SIP data flows, which all hold additional roles, split between EMO (25) and MOA (17). Each MOA also holds an EMO accreditation, either directly or as part of their company umbrella.

This means that Parties are all capable of undertaking physical on site works to contract with a premises owner.

1.2 DYNAMIC ELECTRIC METERING LIMITED

Dynamic Electric Metering Limited (DEML) has historically operated as a Qualified Meter Operator Agent (MOA) and SIP. Their business model is to send the relevant data flows for Metering Activities, but sub-contract out any required physical works to a Qualified EMO.

With the introduction of MHHS, and the challenges faced by some smaller Parties in adopting this new Target Operating Model (TOM) in the market, the opportunities to provide stand-alone MOA flow processing became more costly. DEML has elected not to pursue the continued MOA accreditation due to these obligations and costs not being supported by the level of customer activity requiring this service. Therefore, DEML allowed their accreditation to lapse and the Code Manager did not schedule in a renewal audit. Their MOA accreditation was subsequently revoked 23 July 2025.

1.3 DEML SANDBOX APPLICATION

DEML's contracts for work are typically with a housing association or group landlord, rather than with an individual householder. These contracts are managed on a tripartite basis where the Landlord, DEML and separate EMO are all parties to the contract. This contractual structure was accepted on the MOA basis for the additional SIP accreditation when implemented originally.

DEML is therefore proposing a trial that allows them to facilitate SIP-only Data Flows, as per REC Schedule 14, without also sending MOA Data Flows. DEML does not intend to be accredited to complete physical work under the Consolidated Metering Code of Practice (CoMCoP) in the role of an EMO.

This trial would allow DEML to obtain contracts for SIP works, either alongside an EMO of the Landlord's choosing, or to subcontract any physical works to a REC Qualified EMO. By enabling DEML to contract in this way could highlight a new way of working, enabling other Parties to enter the market and help drive competition.

The impacts on other REC Parties are limited to properties where SIP works are undertaken, where DEML has a contract to send SIP related data flows. Works at those properties would continue to be undertaken by REC Qualified EMOs.

This trial is requested for two years or once a decision and outcome has been reached on the related Change Proposal (CP) I0278 Establishing the Safe Isolation Provider (SIP) as a Standalone REC Metering Party, whichever is sooner. This REC Issue was raised to recognise the SIP role as a standalone Metering Party under the REC.

A summary of the Sandbox Trial and recommendations for the PAB to consider are set out below.

1.4 SANDBOX SUMMARY

The below information has been compiled by the Code Manager in relation to the Sandbox Application:

	SANDBOX TRIAL DETAILS
Summary of the issue	DEML wish to operate in a new role as a "SIP Data Flow Party". This does not affect physical works, only data transfer. DEML would not be accredited as an EMO, nor a MOA. All on site works would be completed by a Qualified EMO. This is requested for two years or once a decision and outcome has been reached on the related REC Issue I0278, whichever is sooner.
Summary of the proposed Sandbox trial and impacted REC obligations	The SIP obligations are contained within the following documents: • Consolidated Metering Code of Practice (CoMCoP) • Schedule 1 Interpretations and Definitions • Schedule 14 Section 28.1 and 43.1 • Schedule 15 Section 9.1. The Sandbox trial would entail DEML needing to comply only with REC Schedule 14 Metering Operations – Section 28 Safe Isolation Provider (Electricity).
Related Changes, Derogations or applications	I0278 Establishing the Safe Isolation Provider (SIP) as a Standalone REC Metering Party was raised to recommend the formal recognition of the SIP role as a standalone Metering Party under the REC. The Code Manager is currently reviewing eight REC legal texts and the Service Termination Issue Reporting Guidance (STIRG) document to establish a clear governance framework for individuals or organisations to accede to the REC as SIPs without requiring Metering Equipment Manager (MEM) status. R0270 Clarification of SIP Qualification Requirements is due for implementation on 27 February 2026. The CP was raised to clarify that Qualified EMOs should also be able to Qualify as SIPs.
Impacted REC Parties and Service Providers	REC MOAs, EMOs, SIPs, Suppliers and Distribution Network Operators (DNOs)

Impacts on Retail Risks	Where SIPs do not meet their obligations under the REC, it will impact Retail Risk II, specifically around "Metering Processes" and "Data Quality".
Legal advice obtained in relation to the application	N/A
Technical advice obtained in relation to the application	This is not anticipated to have any impact on REC systems. DEML has existing SIP processes and controls that were previously audited under their MOA Accreditation. If this trial proceeds, they will only be able to send or receive the six Data Flows that sit under the SIP role: • D0002 'Fault Resolution Report or Request for Decision on Further Action' • D0126 'Asset Condition Report Response / Clearance' • D0135 'Asset Condition Report' • D0136 'Report to Supplier of Possible Irregularity' • D0139 'Confirmation or Rejection of Energisation Status Change' • D0396 'SIP Event Completed' Wilcock Consultants Ltd (WCL) undertake the accreditation for the REC Metering Activities. They have noted that although they do cover data flows under their audit, their focus is on compliance with CoMCoP from a Health, Safety and operational viewpoint. As the sandbox trial would not require DEML to meet obligations in CoMCoP, the focus should be on the data flow requirements in Schedule 14.
Length of the Sandbox trial and Derogation	Two years or once a decision and outcome has been reached on the related REC Issue I0278, whichever is sooner.
Conditions to any Sandbox	DEML will continue to operate its current implemented processes and controls in accordance with its historic MOA/SIP accreditation but only use the SIP flows. Any proposed changes must be declared in advance, allowing the Code Manager to review. As CoMCoP audits focus on Health, Safety and operational processes, the Code Manager suggests that DEML provide quarterly work orders for the Code Manager to randomly check appropriate data flows sent against specific jobs. This data can be gathered from Electralink as required. Any costs incurred in this process be payable by DEML.
Ofgem consent	It is not considered that Ofgem needs to provide permission or be informed of this Sandbox trial.

2 SANDBOX TRIAL REPORTING PLAN

The Applicant and Code Manager will provide a quarterly update to the PAB following trial commencement. This will include:

- Any instances found where an obligation from Schedule 14 has not been met.
- Any benefits identified of splitting the SIP data flow from SIP physical activity
- An update on development and timescales of I0278 Establishing the Safe Isolation Provider (SIP) as a Standalone REC Metering Party

3 RECOMMENDATIONS

Based on the information submitted by the applicant and the assessment undertaken by the Code Manager, the following recommendations have been made for the PAB's consideration.

Proposed Conditions

WCL has confirmed their audit focus is primarily on Health, Safety and operational processes. DEML are happy to be audited as part of this work but as the data flow elements would only form a minor part of a limited scope audit, the Code Manager recommends that instead, DEML are monitored using flow data to ensure obligations are being met.

Timescales

The ongoing work on I0278 Establishing the Safe Isolation Provider (SIP) as a Standalone REC Metering Party would be supported by this trial. Evidence of benefit from splitting out the data flow element and physical works of SIP activities could lead to development of suitable formal Qualification in a SIP Data Flow role as part of the Change. Therefore, it makes sense to link the trial to this Issue.

Benefits & Drawbacks

Separating the SIP data flow element from the physical SIP work could allow for innovation within the sector to the benefit of the consumer and potentially allow for more competition within the market. This is speculative however and would not be able to be determined by this trial.

The risks of data flow errors and the associated individual impact is minimal as DEML has operated successfully under this business model as a MOA for many years.

However, this trial circumnavigates the Change process. Creating a precedent whereby a Party can be allowed to operate in this way, without allowing the due process of the REC Change governance framework could have further reaching implications.

As I0278 is currently undergoing development to consider the benefits and drawbacks of having SIP as a standalone Metering Party, it would be appropriate to allow this process to continue and reach its own conclusion.

4 PAB ACTIONS

PAB DECISION



The Code Manager recommends the PAB to **REJECT** the Sandbox Trial as set out above.