RETAIL ENERGY CODE

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MEETING MINUTES

MEETING	**RECPAB_26_0428**
DATE	**28 April, 10:00am**
LOCATION	**Virtual 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 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
Harry Jones	SEC Representative	HJ	PAB Alternate
Faye Brookes Lewis	Citizens Advice Representative	FBL	PAB Member
Shelley Rouse	Code Manager	SR	Operational Account Manager
Scott McPhillimy	Ofgem	SMcP	Ofgem Representative
Anna Weeks	RECCo	AWe	Service Manager
Walter Carlton	Code Manager	WC	Performance Assurance Partner
Anton Moden	Code Manager	AMo	Performance Assurance Lead
Andrew Waghorn	Code Manager	AWa	Performance Assurance Analytics Lead
Aleksandra Maczka	Code Manager	AMa	Performance Assurance
Tanya Mason-Hawes	Code Manager	TM	PAB Secretary
Sarah Jones	SJW Energy	SJ	Consultant
Matt White	RECCo	MW	Consumer Consent Product Owner
Joy Nnanami	RECCo	JN	Assurance Manager
Carrie Shannon	RECCo	CS	Project Manager
Kevin Redmond	Moorhouse	KR	PAB Observer
Nicola Garland	Moorhouse	NG	PAB Observer
Lewis McKenzie	Moorhouse	LM	PAB Observer

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1. APPROVAL OF PREVIOUS MINUTES AND REVIEW OF ACTIONS LOG

The Chair welcomed attendees to the meeting of the PAB. One apology was received from Beth Procter (SECCo Representative), with Harry Jones attending as her alternate.

The PAB unanimously **APPROVED** the actions and draft minutes from the PAB meeting held on 24 March 2026. PAB Members reviewed the open and overdue actions detailing the progress made so far. One action was closed following information provided in the meeting papers or via a verbal update.

2. UPDATE ON CODE MANAGER EVOLUTION PROJECT

RECCo updated the PAB on the progress of the Code Manager Evolution Project and its overarching assurance strategy (which has been presented to the RECCo board) and update on the three sub-strategies for Parties and Service Users, Service Providers, and Operational/Governance assurance. The team is working to ensure these documents are cohesive and will consult with stakeholders in the Summer, preceded by a webinar to explain the documents.

A PAB Member raised concerns about the short consultation period, particularly given these documents will underpin the delivery of the new disaggregated performance assurance model and the consultation period is during the holiday season, to which RECCo responded that the consultation is consistent with previous years and will be supplemented by a webinar.

NEW ACTION: Code Manager and RECCo to liaise and ensure relevant RECCo representatives are included in the next PA Webinar held in July 2026 to support the communication of the consultation on changes to Performance Assurance.

Work is continuing to refine strategic products, such as the Category 3 products which stakeholders can find on the REC Portal and include the PAOP and Retail Risk Register.

An Assurance Integration Lead has been successfully recruited and is due to start in June 2026, bringing extensive experience in assurance work through other Code bodies. RECCo has also developed some Performance Assurance decision making principles that will help RECCo feel more confident in their decision making with regards to Performance Assurance. They will also be used for market design and design authority change activities to ensure consistency across the organisation and guide RECCo into making robust decisions.

Workstream three focuses on the mobilisation and transition from the current Code Manager to a network of service providers. For this workstream knowledge transfer workshops are being held throughout the summer, and an exit management plan has been developed to ensure a seamless handover and continuity of service.

A PAB Member highlighted the challenge of moving from one contract to managing multiple contracts post-transition, to which RECCo explained that it is taking a more active role to ensure responsiveness and agility whilst aiming to present a unified REC brand across all service providers for stakeholder clarity.

The PAB:

- **NOTED** the update.

3. CONSUMER CONSENT UPDATE

SJ and MW joined the meeting.

DRAFT

Representatives from RECCo introduced the Consumer Consent Solution (CCS), a central energy market consent management system and consumer-facing portal. CCS aims to address fragmented consent mechanisms, support energy transition, and ensure accessibility and inclusion. The design consultation is closed, and technology procurement is ongoing.

A PAB Member questioned the portal's complexity and potential customer experience challenges. RECCo acknowledged this, confirming planned organisational support and a focus on functional technology. He also detailed CCS components, emphasising verifying consent-givers and proper data management. The timeline includes ongoing procurement, designing governance, performance assurance, and REC change processes, with enhancement into 2027.

The SEC Alternate queried the impact of the R0318 Change will have on SECCo, to which RECCo reassured that the CCS team is collaborating closely with SECCo, with the goal for SECCo to manage consent processes and controls, though practical details are still being determined.

RECCo outlined the Performance Assurance Framework, noting that CCS will be a new REC Service requiring service provider assurance and new definitions under Schedules 1 and 9. She stressed the importance of strong governance, rigorous standards, and public trust to safeguard data, identifying risks such as public trust, consumer safety, regulatory breaches, and discrimination. CCS User Qualification will involve preventative measures (guidance, accreditation, training), monitoring (with Moorhouse, potentially using survey principles from I0189), and remediation (action plans, potential data access termination as a last resort). A PAB Member asked about accreditation responsibility, which RECCo clarified would sit within the Qualification Service Provider.

RECCo also explained the development of Customer Experience Guidelines (CEGs), adapted from Open Banking, to set uniform standards for customer journeys and ensure GDPR compliance. These will involve a checklist for Authorised Third Parties, with initial drafts to be discussed in working groups. A PAB Member questioned the prescriptiveness of CEGs, to which RECCo confirmed an outcome-focused approach.

A PAB Member asked about consumer engagement, and it was explained that initial engagement would be primarily through Authorised Third Parties due to a limited number of trailing services and limited customer choices on the matter. They noted that a more elaborate consumer engagement plan would be developed over time.

The next steps include raising awareness of CCS activities, working with Moorhouse on performance assurance and the current Code Manager on Qualification, and consulting on Code changes (including ISDP and PARC) over the summer, with concepts presented in June.

RECCo provided the specific email address should anyone have any questions or would like any more detailed conversations on CCS: Consumerconsent@retailenergycode.co.uk.

The PAB:

- **NOTED** the contents of the paper and request to provide comments on any concerns identified, ahead of detailed CCS proposals being provided to PAB at its June 2026 meeting.

SJ and MW left the meeting

4. OPERATING PLAN

The Code Manager updated the PAB on the Operating Plan, detailing the actions taken for the month of April and the planned activities for the next few months. No comments were received prior to the PAB meeting.

The PAB:

- **NOTED** the update.

5. PARTY ASSURANCE UPDATE

The Code Manager highlighted ongoing issues with missed PARC submissions, particularly regarding Change of Occupier data, and recommended that the PAB approve Information Request PATs being issued to the Parties that have not submitted PARC #1450.

A PAB Member asked about managing increased exceptions as more Suppliers migrate under the MHHS transition, the increase in exceptions that will fall under the risk driver and how it will be addressed in terms of workload and engagement with those Parties. The Code Manager explained that IF45 is a key point for monitoring, and whilst only a small number of Suppliers are onboarded, this is expected to ramp up, so it is essential to engage with people who are experiencing problems and focus the risk drivers in the right areas.

A further question asked by the PAB Member was on what exception would arise for not appointing a Data Service or Meter Data Retriever (as an example). The BSC representative commented that they have a parallel activity looking at these appointments, and although items may be out of sequence, it's not a significant concern as long as they're being worked on. Further, the Code Manager noted that there has been positive engagement with MOAs about some of the MTD data sharing requirements and responses indicate the right kind of behaviours and engagement in the market.

The Code Manager further updated the PAB that whilst meter migration is increasing, the risk driver score is falling.

NEW ACTION: Code Manager to revisit the threshold setting for the two suppliers being monitored for meter migration.

PAB Members raised concerns about non-communicating smart meters and the recent changes to licence obligations and Ofgem's work on new guaranteed standards to address communication issues, ensuring ongoing regulatory attention to the matter.

NEW ACTION: Highlight relevant elements of the Party Assurance paper to Ofgem, ensuring they are aware of the elements outside REC governance but relevant to consumers.

The PAB:

- **APPROVED** the application of an Information Request PAT to the Parties that have not submitted PARC #1450. Where the Parties fail to respond by the agreed deadline, a Management Assertion PAT will be issued.
- **NOTED** the PATs applied by the Code Manager in line with the Performance Assurance Methodology and Techniques Document for April 2026 Data Review, and PARC #860/861 Non-Submission.
- **NOTED** the Change Panel approval of the Change Proposal Plan related to R0311(CoMCoP Audit Schedule).

6. DATA ACCESS REQUESTS

CT joined the meeting.

The Code Manager Change team provided to PAB the background and rationale behind the addition of a new category Code Required Body to the Data Access Matrix.

The Code Manager explained that the reason is that they have been approached by an entity who provide services as part of their obligations under the BSC (Balancing & Settlement Code). Their

DRAFT

specific role involves helping to provide generation and flexibility assets. They are acting as an interface to the BSC and aggregate the assets, trade the output and are financially responsible for how the electricity from these assets is settled. Under this set up, the asset owners do not directly interact with the BSC and instead that interaction is done through the requesting entity. This means that whilst the entity is not an agent in strict legal terms, they operate as a market-facing representative for the BSC. Accordingly, it would be appropriate to add them under the new category as a Code Required Body.

The Code Manager pointed out that the paper provided to the PAB further sets out the specific items that the entity are looking to access and the rationale for each one.

The PAB:

- **APPROVED** the Code Manager's proposal to add the new category Code Required Body to the Electricity Data Access Matrix.

CT left the meeting.

7. DATA QUALITY

The Code Manager led a detailed discussion on data quality, summarising consultation feedback on the cost-benefit of cleansing various data items (of which there were six responses). The Code Manager summarised the results of a consultation on data cleansing, noting that only 'energised no meter' showed a clear net benefit for cleansing. For other items, the cost information was limited or indicated low benefit, prompting a discussion on whether to pursue further cleansing or focus on process changes.

The Code Manager summarised key elements from the consultation, which were:

- Specific individual organisations that called out 'energised no meter' as causing DNOs problems.
- Another suggested DPI as an issue.
- There is a cost benefit for 'energised no meter', which clearly indicates that there is a significant net benefit to industry for cleansing them.
- Lastly, where is no cost information, so they cannot conclude on cost benefit.

PAB Members highlighted issues with optional data fields and the need for stricter validation to prevent missing or incorrect data at the point of entry. The Code Manager agreed to consider changes to enforce mandatory data population and improve process controls.

PAB Members discussed the potential for bulk data cleansing and alternative data sources to address large backlogs, especially for meter technical details, and further consideration was discussed around the trade-offs between manual flows and centralised updates, with caution to avoid disincentivising correct data entry.

The Code Manager explained the use of data plans and sprints to monitor and target data quality issues, with flexibility to adjust targets and reporting based on feedback and evolving industry needs. The PAB agreed to maintain a focus on setting standards and monitoring compliance rather than mandating costly cleanses.

NEW ACTION: Following the discussion on Data Quality, which highlighted continuing issues with meter data quality, and which does not seem to be resolved with the continuing rollout of Smart and Advanced meters, the Code Manager will raise a REC issue to:

- Review and confirm the ongoing requirement for fields to be mandatory in data flows, or if alternate sources of data exist.
- Explore if permitted values for certain data items should be restricted for new meter installations whilst recognising the ongoing validity for existing data (e.g. “Unknown” meter location for new installations, default ESME ID).
- Ensure that requirements are clear, consistent and well communicated to relevant parties. This will involve targeted industry sessions, similar to those already occurred in the Gas industry.

The above exercise to include, at a minimum, meter location, ESME ID, top line data items and the associated flows to update MTDs.

NEW ACTION: The Code Manager, supported by other Assurance providers to bring an updated strategy on how to resolve the MTD inconsistencies, considering a bulk upload process versus targeted assurance of accuracy.

8. ANNUAL RATING

The Code Manager and PAB discussed the feedback from the Annual Rating consultation (including where the Code Manager proposed changes) as well as the next steps which included PAB approval of individual ratings in June and publication of the draft ratings in July.

The Code Manager proposed updating the language of the system to be more balanced, following consultation feedback. PAB Members agreed that it was a sensible approach, as long as definitions remain clear. There was further discussion on the importance of not overstating ratings and ensuring compliance is accurately reflected, and that the proposed naming conventions are from suggestions made by Parties throughout the consultation.

The Code Manager further discussed the inclusion of MEMs in the new annual rating approach, and the desire to ensure that all Parties are subject to these assessments, and ratings that are consistent for everyone. PAB Members raised the concern of audit inconsistencies during the transition to the new CoMCoP regime and emphasised the need for clear communication about the limitations of comparisons during the first year. PAB Members agreed that a soft launch would be most appropriate in this regard. RECCo noted concerns from its Metering team that it should be explicit about the fact they recognise inconsistencies in the metering audits due to the CoMCoP changes and the potential issues surrounding the judgement of the ratings. That is why they are making it clear on the rationale for having a soft launch.

The Code Manager explained the rationale for retaining the current lowest-category-determines-score approach for now, given the upcoming service provider transition and the issues that may arise with committing them to deliver this updated rating in the very first month of their tenure. The Code Manager further stated that there are some alternatives that are worth looking into, but now may not be the best time to change the Annual Rating scoring and labelling.

One PAB Member raised concerns about the I&C Sector and the importance of incentivising Parties to act to detect energy theft.

Further, it was discussed that the incentive regimes need to move with the new Performance Assurance team and that it was essential that this matter is included in those handover activities, to which the Code Manager and Moorhouse confirmed would be the case.

NEW ACTION: Code Manager to provide Annual Rating questions and feedback from the MEMs’ soft launch for the Moorhouse handover sessions, to enable a smooth transition.

The PAB:

- **APPROVED** the updated labels associated with the Annual Rating categories.
- **APPROVED** the inclusion of Metering Agents in the Annual Rating 2025-2026, subject to a soft launch.
- **APPROVED** the retention of the current approach for 2025-2026 Annual Rating.

9. AOB

A PAB Member raised a comment relating to the Annual Report For Information Paper, that there was a line included in the report around the opportunity for PAB Members to contribute. They stated that they felt Members already had many opportunities to contribute. The Code Manager responded to clarify that the feedback as they understood was around the Code Manager being in a dialogue with PAB Members as opposed to only coming for approval/rejection of certain items. The Code Manager also noted that this was raised by other PAB Members in the breakout groups whereby another Code Manager was present and so this may be better explained and actioned on their return at the next PAB.

The Ofgem Representative noted a reminder for the Code Manager to flag to him the item brought up in the Performance Assurance section (this was relating to meter points not communicating) so he can ensure this is appropriately flagged to the relevant people in Ofgem.

Additionally, the SEC Alternate gave a verbal update related to Performance Assurance Framework artefacts (risk evaluation methodology, risk register and their own PAOP) which started with the proof of concept on one item (incorrect DNO certificates). They have contacted Suppliers who will be subject to this Performance Assurance. Following completion of this, another update will be provided to understand how this works. Further, they provided contact details should anyone have additional queries. The email provided was: SECPerformanceAssurance@seccoltd.com for SEC PAB's Performance Assurance inbox and PA related queries.

The PAB:

- **NOTED** the update

10. NEXT MEETING DATE

The next (May) meeting of the PAB will be held online on 02 June 2026.

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