RETAIL ENERGY CODE

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REC ISSUE GROUP
MEETING NOTES

DATE	**11 August 2023, 10:00**
LOCATION	**By teleconference**

1 INTRODUCTIONS

The Chair welcomed attendees to the meeting of the REC Issue Group (RIG).

The Chair confirmed the agenda, asking for Any Other Business (AOB) to be raised at this time. The Chair highlighted that one AOB item was raised prior to the meeting, with two further AOB items being raised at this time. Later in the session, RIG members noted the following three AOB items for discussion.

AOB items were as follows:

- Gas Subject Access Requests (SARs)
- Future REC Releases
- Special RIG – 18 August 2023

2 DATA CLEANSE UPDATE

2A REPORT AR3F

The Code Manager Lead Analyst highlighted the AR3F report hasn't been produced for August, confirming there are issues with it. The Code Manager Lead Analyst elaborated that a REC change is required to the data access matrix for EES, to ensure all parties have the access to the same version of the Domestic Premises Indicator (DPI). It was agreed that parties will be communicated with before the AR3F report is produced again.

2B DATA CLEANSE UPDATE

The Code Manager Lead Analyst provided an overview of the Data Cleanse Results Update for the last month. It was highlighted there was a large increase in the AR3A report, but it's started to decrease once again. The Code Manager Lead Analyst elaborated there has been a decrease trend in the AR3C report, which is to be expected due to this report being included in the sprint.

It was noted there has been a decrease within the Invalid MAP ID report. The Code Manager Lead Analyst advised positive engagement has been received from the MAPs, with data soon to be provided from them to help provide insight on who the correct MAP should be. It was noted there has been a strong decrease within the No Meter MTC- No MSN report since March 2023.

The Code Manager Lead Analyst advised there has been a large increase within the Smart MTC Mismatch Report. This report has previously been discussed at RIG, to seek feedback from members on whether this report still causes a negative impact. A RIG member raised that as part of the MHHS program, the MTC will become redundant. They elaborated that REC need to consider whether cleansing MTC data will be a right use of parties time. The Code Manager Lead Analyst noted there has been engagement with the MHHS programme to ensure no work is being duplicated.

The Chair asked if there was any particular reason for the trends that are decreasing. The Code Manager Lead Analyst advised some reports will decrease month to month due to standard operations, whereas other reports will have a constant decline.

3 DATA CLEANSE ISSUE DC10 – REQUEST FOR ADDITIONAL GUIDANCE ON REPORT AR3C

A RIG member presented an overview of Data Cleanse Issue DC10- Request for Additional Guidance on Report AR3C, which can be found on slide 6 of the pack here. The aim of this discussion was to establish if there is any documentation or guidance on which SSC to use, in the scenario if 2 or more MPANs that have unrestricted SSC where the Relationship Flag has been made active, and no MPAN in the relationship has an SSC outside of the unrestricted range. The RIG member noted they have had several relationships that have been flagged to them, which all contain SSC 0393.

A RIG member noted the SSC is determined by the configuration of the meter on the wall. They elaborated if 2 meters are SSC 0393 at a property, it's unrestricted and therefore they are not related. The only exemption being if the meters are commercial, and the relationship is being driven by the DNO advising they need to be put in a relationship.

The RIG member was grateful for the advice provided by other RIG members and thanked them for their contributions.

4 GUIDANCE ON REC REQUIREMENTS FOR ANNULMENTS AND REJECTIONS

The Code Manager Lead Analyst provided an overview of the Guidance on REC Requirements for Annulments and Rejections, which can be found on slides 8-12 of the

pack here. The aim of this discussion is for RIG members to provide feedback on the guidance drafted, before being uploaded to the REC portal for parties use.

A RIG member noted since the last RIG when this was first presented, they had reached out to their internal operational team, and they noted the guidance was clear to them. They elaborated to say they were happy with the guidance and didn't offer any improvement feedback.

Another RIG member highlighted the summary criteria needs to be clearer, around objections for non-Domestic. They elaborated for non-Domestic, objections can be raised mid contract or for debt, but for Domestic objections can only be raised for debt. The RIG member noted the need to also be clearer on the criteria for a Change of Occupier. Currently, there isn't a criteria, which leaves them open to multiple interpretations. There needs to be guidance on what process for evidence parties should be providing.

Action: The Code Manager to provide more clarity on the summary of when objections can be raised.

Action: The Code Manager to provide guidance on the criteria for a Change of Occupier.

Another RIG member advised it would be useful to have guidance on when it's appropriate to raise an Erroneous Transfer and when it would be appropriate to use the Annulment process, with timings.

Action: The Code Manager to provide guidance on when it's appropriate to raise an Erroneous Transfer and when it would be appropriate to use the Annulment process, with timings.

The Code Manager Lead Analyst advised the next steps will be to include the points that have been raised by RIG members in the updated guidance, before uploading it to the REC portal. Notes will be sent out in the REC Weekly Bulletin, advising parties where to find it on the portal.

5 P1 SWITCHING INCIDENT UPDATE

The Code Manager Lead Analyst highlighted that a lessons learned exercise will be undertaken, to identify the root cause and how the incident was handled. They elaborated that the Code Manager will also be involved, trying to ascertain the broader impacts on Suppliers and their customers.

6 INFORMATION REQUEST: CUSTOMER IMPACT ON DCC P1 ISSUE

The Code Manager lead analyst mentioned that a request for information has been developed, which will be sent to parties to ascertain the impact of the P1 Switching

Incident. The aim of this discussion is to gather feedback on the questions which have been included in the request for information, before issuing it to the wider industry.

A RIG member noted their internal tech team has been heavily involved in this issue and they are keen to provide as much detail to the REC as possible. They elaborated this is to try and ensure this doesn't happen again, but if it does, the IT doesn't drag on as long as it has for this incident. The RIG member advised the request for information does feel proportionate, it gives parties the opportunity to help with the lessons learned and put measures in place to ensure there's a disaster recovery plan in place.

Another RIG member highlighted the timing of this request, being issued in mid-August might need to be altered. They elaborated that it's in the middle of the holiday season and there are still some quirks on how gas operates, which won't be fully ironed out before this request is issued. The Code Manager Lead Analyst agreed it might be beneficial to delay issuing this request until end of August, early September.

Another RIG member asked if the 2-week deadline for responses could be slightly increased. They elaborated that as this issue will cause consequential impacts, they would need to go through governance before responding.

Another RIG member asked if this request for information will be issued to DNO's, or if it's just for Suppliers. The Code Manager Lead Analyst noted it was just to gain Suppliers feedback and there will be a different approach taken on collecting feedback from DNO's. The RIG member mentioned DNO's have been significantly impacted by this issue, with the extreme concern being vulnerable customers that have been affected. The Code Manager Lead Analyst agreed that DNO's need to be consulted and an approach will be defined on how best to obtain feedback from them.

Another RIG member noted the need to consider non-Domestic rounds for disaster recovery. They elaborated that initially the disaster recovery testing was scheduled for March and after feedback, the DCC delayed it to ensure there was no impact ahead of the main contract rounds.

The Code Manager Lead Analyst thanked RIG members for their feedback and asked for any further feedback to be provided to the Performance Assurance mailbox.

Action: The Code Manager will distribute the Request for Information to Supplier party RIG members after the meeting.

7 REC CP 0094 – CLARIFY OBLIGATIONS ON GAS METER EXCHANGES THAT OCCUR CLOSE TO CHANGE OF SUPPLIER (COS)

The Code Manager Lead Analyst provided an overview of REC CP 0094 – Clarify Objections on Gas Meter Exchanges That Occur Close to Change of Supplier (CoS), which

can be found on slides 17-24 of the pack here. The aim of this discussion is to gather RIG members thoughts on the CP and to ascertain how big of an issue this is in the industry.

A RIG member noted the same issue can arise for electricity and asked if those obligations will be looked at, as part of this CP. They elaborated that the electricity rules may have been sourced from a particular area and the rules could be more robust. It would make sense to try and mirror both the electricity and gas rules, meaning parties would have the same obligations. The Code Manager Lead Analyst advised that only gas has been looked at for the scope of this CP, however how this problem is resolved in electricity will be explored. This is to ensure no discrepancies are introduced.

Another RIG member noted this CP could cause system changes for MEMs, due to only the appointed MEM being able to send ONJOBs. The Code Manager Lead Analyst agreed to pick this up with MEMs to clarify the impact on them. It was noted that in electricity, MEMs are required to send flows, regardless of whether they are the appointed MEM or not at the time. This applies if work has been undertaken during their appointment period. This also needs to be the same for gas instances.

Another RIG member noted that the electricity and gas markets are completely different. They elaborated that Shippers and Suppliers address this issue by creating the Connections & Disconnection store, which is a legal obligation, which the MEM can discharge, regardless of their registration status by updating the C&D store.

Another RIG member highlighted due to faster switching, more of these instances could occur. They elaborated that they have seen customers receiving their meter exchanges a few days before the switch date and asked that if the customer gives a reading which goes straight across, what the impact is on this. The Code Manager Lead Analyst advised that the proposer of this CP noted this has been exacerbated by faster switching.

RIG members agreed to provide further feedback to the Code Manager after the meeting, with an update being provided at the next RIG, dependant on the feedback received.

8 REC CHANGE – CHANGES TO REC ACCESS GOVERNANCE

The Code Manager Lead Analyst provided an overview of the Changes to REC Access Governance, which can be found on slides 26-36 of the pack here.

A RIG member asked if instead of moving these changes out of the low priority category, should they be kept there but managed in a timelier fashion. The Code Manager Lead Analyst advised these changes will be moved to a more efficient process, whereby they wouldn't go through a prioritisation process. This would mean that the changes wouldn't be classed as low priority. Another RIG member asked at what point does a low priority change become a priority, if it's been in the backlog for 12 months.

The Code Manager Lead Analyst noted that this is part of a wider project being looked into, which involves reviewing the end-to-end Change Proposal process. They elaborated,

the Change Proposals will be grouped under different themes, which would mean that instead of progressing a number of separate CP's, 1 CP will be progressed through the process.

A RIG member noted at the last Metering Expert Panel (MEP) meeting, there was an issue with a proposed Category 3 document. They elaborated the lawyers confirmed it should be a Category 2 document, as it has material impact. The RIG member asked if legal advice has been gathered on this change to confirm that it can be a Category 3 document. The Code Manager Lead Analyst confirmed discussions have taken place with the lawyers and if they advise it can't be a Category 3 document, there is an alternative solution which can be progressed. The RIG member noted they would want to have visibility of the legal advice, which proposes it to be a Category 3 document.

A RIG member advised Option 1a would be the preferred solution, as this is a pragmatic and quick solution. Another RIG member noted depending on the legal discussion, option 1a would be their preferred solution, as this will streamline the process in a positive way.

9 RIG ISSUE UPDATE- ISSUE 19 GAS DISCONNECTION PROCESS

The RIG member provided an overview of the Gas Disconnection Process, which can be found on slides 38-40 of the pack here.

A RIG member asked if this issue was affecting Domestic customers. It was confirmed that this is affecting primarily Domestic customers, however there could be an impact to a small number of non-Domestic customers.

A RIG member noted the need to pick up the purging requirement, on the outlet pipe work. They elaborated that if it's above a certain volume, it's got to be purged Another RIG member asked if this is being picked up separately under the DESNES. They elaborated that there is an action on Suppliers to update their website with up-to-date guidance. It was noted a broader conversation might occur within the Industry, which will result in having a consistent approach.

10 REC CHANGE PROPOSAL CONSOLIDATION – R0058, R0104 AND R0129

The Code Manager Lead Analyst provided an overview of the REC Change Proposal Consolidation of R0058, R0104 and R0129, which can be found on slides 42-49 of the pack here.

A RIG member asked if Change Proposal R0058 might cause unintended consequential impact arising from the P1 Switching Incident. They elaborated that the legal text for R0058 would have been drafted before the P1 switching incident. The Code Manager Lead Analyst confirmed discussions had taken place with the lawyers after the P1 Switching

Indiecent occurred, but another discussion will take place to ensure there will be no impact on this change from the P1 Switching Incident.

Action: The Code Manager to confirm with the lawyers that the P1 Switching Incident won't cause any impact on R0058.

Another RIG member asked if the intention was to consolidate these Changes into one Change, or still keep them separate but progress them simultaneously. The Code Manager Lead Analyst confirmed the intention is to combine these changes into 1 new Change, then the proposers will withdraw R0058, R0104 and R0129. The RIG member asked why these Changes aren't being progressed individually. They asked further if there was a benefit to raising another Change, when the original three have already been raised. The Code Manager Lead Analyst advised it will be a more efficient use of resources if one Change is progressed. They elaborated it would involve drafting one Preliminary Change Report (PCR), one Final Change Report (FCR), the administration will be a lot quicker, and one Change Analyst will be progressing the change.

Another RIG member asked what would happen if particular elements of the Change are disputed or rejected, as part of the Consultation or Impact Assessment. The Code Manager Lead Analyst advised if one Change is disputed, it would be removed from the new Change and that would be progressed with the two other elements. The RIG member noted that consolidated Changes might help the Code Manager resource, however it might not help parties. They elaborated that parties will be reviewing larger Changes, which could prove to be more complex. The Code Manager Lead Analyst noted that if a Change Proposal (CP) has been raised and categorised as a low priority, engagement can be key to ascertain if it may become more of an urgent issue. They elaborated that at any point, a CP can become more urgent since the initial categorisation.

Another RIG member mentioned it could be useful to put in a backstop date, which will set expectations for parties as to when the CP's are going to be progressed and implemented. The Code Manager Lead Analyst advised CP's are evaluated more than once, but generally the status isn't changed after the original evaluation. They elaborated that forms part of the current process, but the introduction of the new process will include lessons learnt from the last two years, since the REC Change process went live. The Code Manager Lead Analyst highlighted utilising the RIG is a great opportunity and should help ensure Changes are progressed in a more efficient way.

RIG members agreed to the legal text proposed in R0104.

A RIG member asked what the rationale was for adding in 'as soon as reasonably practical' as part of the proposed legal text for R0129. They elaborated that the suspension should be immediate once the instruction has been received, but adding in 'as soon as reasonably practical' gives flexibility not to do it immediately. The Code Manager Lead

Analyst confirmed this extra wording was added in by the lawyers, but it will be taken back to the legal team for further review.

11 ANY OTHER BUSINESS

11A GAS SUBJECT ACCESS REQUESTS

A RIG member raised an AOB item, around whether an item should have been added to this meeting agenda surrounding gas Subject Access Requests (SARs). The Chair advised there is a Switching Operator Issue Forum (SOIF) meeting taking place on 14 August 2023, when this will be raised. Another RIG member confirmed RECCo decided it would be beneficial for parties to fully understand what the issue is and then attend the SOIF call with more of an understanding.

11B FUTURE REC RELEASES

Another RIG member noted that in the latest edition of the REC weekly bulletin, it highlighted there will be extraordinary releases in September and December 2023. They elaborated that the Release tab on the REC Portal doesn't show these release dates and asked if the Portal can be updated to reflect this. The Code Manager Lead Analyst noted they will pick up with the RIG member separately on this and provide clarity on the September and December releases.

11C SPECIAL RIG – 18 AUGUST 2023

The Chair advised a special RIG will be hosted on 18 August 2023, which will consider the consolidation of the current live CPs relating to changes to the SDEP system.