RETAIL ENERGY CODE

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I0189 VOICE OF THE CONSUMER – ISSUE CLOSURE REPORT

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1 SUMMARY

The purpose of this paper is to provide information on I0189 Voice of the Consumer, including steps taken and progress made by the Code Manager. It will also provide the reasoning for moving this REC Issue to Resolved, and the next steps expected from RECCo.

2 BACKGROUND

REC Issue I0189 Voice of the Consumer was raised by the REC Performance Assurance team. It aimed to explore potential options for increasing the feedback the Code Manager receives from Consumers about their interactions with the Retail Energy Code or any activity governed by the Code.

An example of one way the Code Manager receives this now is via the Smart Meter Installer Domestic and Microbusiness Surveys. This was intended to be used not only for Performance Assurance activity, but also to inform the Code Manager of what is and is not working within the Retail Energy Code and any potential changes that may be required.

3 PROBLEM STATEMENT

RECCo's mission is to facilitate the efficient and effective running of the retail energy market, including its systems and processes through promoting innovation, competition, and delivering positive Consumer outcomes. However, the Code Manager receives limited feedback directly from Consumers to determine if this mission is being fulfilled

4 PROGRESSION OF I0189 TO DATE

The below Proposal Plan lays out the main steps and stages of I0189 that were undertaken by the Code Manager, and some steps in the future that have not been taken. The reasons why will be explained further within this document.

Milestone	Activity	From	To
Definition		**16 Oct 24**	**30 Apr 26**
	Code Manager Assessment	October-24	October-24
	Solution Development	November-24	September-25
	Service Provider Impact Assessment	October-25	December-25
	Party Impact Assessment (not started)	January-26	March-26
	Solution Refinement (not started)	April-26	April-26

4.1 SOLUTION DEVELOPMENT

Solution development occurred between November 2024 and September 2025. This included seven industry working groups which took place between November 2024 and July 2025. The slides, materials and minutes from these working groups can be found on the REC Portal here.

The working groups were attended by a number of Energy Suppliers, RECCo, Ofgem and Citizens Advice alongside the Code Manager. The first working group was run by the Code Manager, with an explanation for why the Issue had been raised and an overview provided of proposed solution options. This included the plan to review the current Smart Meter Installation Survey (SMIS) questions, the potential introduction of new surveys and a debate as to whether the surveys should be run through a central solution, rather than each Energy Supplier being directly responsible for sending their own Surveys (e.g. how the SMIS works currently). There was a strong consensus to centralise where possible, due to the costs to each Energy Supplier of procuring their own independent Smart Meter Survey Organisation.

Further working groups were dedicated to:

- Reviewing the current SMIS questions;
- Reviewing appropriate areas of the REC that may benefit from Consumer Surveys, with the scope being narrowed to Switching and Prepayment;
- Developing questions for the new proposed Consumer Surveys; and
- Developing how centralising the solution could work.

To ensure all UK GDPR requirements and concerns were considered, the RECCo Data Protection team were consulted and a Data Protection Impact Assessment undertaken. They were comfortable with a proposal for a central system where Surveys are held and responses received into, but for Energy Suppliers to have an obligation to send Survey links to Consumers so that no Consumer contact information was required to be held centrally.

Energy Suppliers had expressed a preference, where possible, that they be allowed to amend any Survey questions to their own branding and tone. This requirement was not taken forward as part of the solution due to the complexities involved with building this into a central system. There was also a concern flagged by RECCo, that as RECCo (and the Code Manager via delegation from RECCo) would remain ultimately responsible for the Survey questions, any

amendments to questions would need to be reviewed by the RECCo Data Protection team which would be time consuming and impractical.

4.2 SERVICE PROVIDER IMPACT ASSESSMENT

A Service Provider impact assessment was conducted by the Code Manager between October 2025 and January 2026.

This Service Provider impact assessment confirmed:

- A total design, build and test cost of £114,000 for the creation of the Survey Portal;
- An on-going cost of £1,500 per annum, to support the Survey Portal and cover relevant software licencing costs; and
- A lead time of three months between approval and go-live to design, build and test the Survey Portal.

No Service Provider impact assessment has been conducted by REC Performance Assurance at this time, due to the timing of pending changes to this service (more information available on the RECCo website here). As any further proposals progress this will be assessed with the new Service Providers, as appropriate.

5 PROPOSED SOLUTION

The initial draft of the legal text to support I0189 can be found on the REC Portal here. This has been reviewed in full by the REC legal advisors.

This was planned to be the basis for the Party impact assessment, with the Code Manager using feedback to refine the solution. If required (e.g. a large number of conflicting Party impact assessments were received), the working group would have been stood back up for further opinions in this solution refinement stage.

6 DECISION TO MOVE I0189 TO RESOLVED AND NEXT STEPS

A decision has been made by RECCo and the Code Manager to move this REC Issue to Resolved at this time, and to revisit it in the future when several current unknowns are able to be included within any future assessment.

The reasons for this decision are:

- A full strategy review around REC Performance Assurance is taking place by RECCo and the new Party Assurance Service Provider. A key part of the review will be to consider the best means of measuring consumer outcomes and it is important that any future change is aligned to this strategy. Therefore, the solution refinement and the Service Provider impact assessment required by REC Performance Assurance cannot be started until the strategy is developed;
- Since I0189 was raised, a new Digital Services Provider has been appointed within the REC who are developing a new REC Portal. There are considerations as to how this

REC Issue could potentially link in with the new REC Portal, or any other digital solutions that may now available under the new Digital Service Provider; and

- This is not a priority change for the industry at this time, when we are in a time of peak change (e.g. Code Reform, Market-wide Half Hourly Settlement).

Once all of the above points have been reviewed and considered, RECCo and the Code Manager will decide if they wish to progress a Change Proposal to take forward this proposal (or any variant of) in the future.

6.1 REVIEW OF SMIS QUESTIONS

The Code Manager is aware there has been some appetite from Energy Suppliers to review the SMIS questions. If this remains the case, the Code Manager would ask that an Energy Supplier raise a new Issue into the Change Team. Discussions can then be had with the Proposer of this new Issue as to whether they would like to use the work already done under I0189, or if they would like to begin again.