RETAIL ENERGY CODE

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REC ISSUE SUBMISSION FORM (COPY)

1 PERSONAL DETAILS

PROPOSER NAME *(Mandatory)*	Rebecca Griffiths
COMPANY *(Optional)*	RECCo
COMPANY TYPE *(Optional)*	
TELEPHONE NUMBER *(Optional)*	
EMAIL ADDRESS *(Mandatory)*	rebecca.griffiths@retailenergycode.co.uk

2 ISSUE SUMMARY

ISSUE TITLE *(Mandatory)*	Release and Licensing of the CoMCoP Logo for Accredited Parties
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	Although a CoMCoP logo was trademarked prior to the launch of the CoMCoP in April 2023, the logos have not yet been made available for use. This delay was due to the decision to await the implementation of R0152. In the interim, materials in public circulation still display logos from the previous (pre-CoMCoP) Codes, and Parties certified or qualified under CoMCoP do not have a logo to display on their marketing materials to demonstrate their status. The absence of an official, widely available CoMCoP logo undermines the visibility and credibility of the accreditation scheme. This gap perpetuates confusion among consumers and stakeholders, allows outdated branding to persist, and fails to reward Parties who have invested in meeting the highest standards of metering practice. Without a clear accreditation mark, the benefits of CoMCoP certification are not fully realised or recognised in the marketplace. We now wish to make the CoMCoP logos available for

	use under licence, and have agreed with Gowlings that the most effective approach is to incorporate the logo into the REC. If the REC Change is not implemented before September 2026, a separate licence will be made available as a temporary measure for those wishing to use the CoMCoP logos. Stakeholder engagement will be prioritised through targeted communications, webinars, and guidance materials to ensure all Parties understand the value and correct usage of the CoMCoP logo.
WHAT IMPACT IS THIS HAVING? *(Mandatory)*	The lack of a visible accreditation mark risks eroding consumer trust and confidence, as there is no straightforward way for consumers to identify accredited Parties. This situation may also discourage Parties from seeking or maintaining accreditation, as the benefits are not sufficiently visible or valued. Furthermore, it increases the risk of misrepresentation and reputational harm to both RECCo and accredited Parties. 1. Market Clarity and Consistency • The absence of a unified, accredited logo has resulted in the continued use of outdated branding, which can confuse consumers and undermine the visibility of current standards. • Launching the CoMCoP logo will ensure that all accredited Parties present a consistent, recognisable mark of quality, supporting a level playing field and reducing the risk of misrepresentation. 2. Consumer Trust and Confidence • In a market where trust is paramount, a visible accreditation mark provides consumers with immediate reassurance that they are engaging with Parties who meet rigorous, up-to-date standards. • The logo acts as a quick reference point for consumers, helping them make informed choices and fostering greater confidence in the market as a whole. 3. Recognition and Incentive for Accredited Parties • Accredited Parties have invested in meeting CoMCoP standards. The logo serves as a tangible reward and public recognition of their commitment to quality and compliance. • This visible differentiation incentivises ongoing compliance and encourages others to seek accreditation, raising overall standards across the sector.

	4. Mitigation of Reputational Risk • Without a controlled, official logo, there is a risk of unauthorised or misleading use of branding, which could damage the reputation of both RECCo and accredited Parties. • The proposed licensing and governance arrangements provide clear mechanisms for enforcement and withdrawal of rights in the event of misuse. • Incorporating the logo into the REC, with robust legal and procedural backing, ensures that its use is properly governed and protected.
WHAT DO YOU CONSIDER TO BE AN EFFECTIVE SOLUTION? *(Mandatory)*	The CoMCoP logos should be released and made available to all eligible Parties under a robust, well-governed licensing framework. This will ensure that only those who meet the required standards can use the logo, protecting its integrity and value. The logo should be actively promoted as a hallmark of quality, with clear guidance and enforcement mechanisms to prevent misuse and to maximise its positive impact on market behaviour and consumer outcomes.
IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE ISSUE THAT WOULD BE USEFUL? *(Optional)*	Introducing the CoMCoP logo will build greater trust and confidence among consumers by offering an easily recognisable accreditation mark. This logo will promote transparency and assist consumers in identifying Parties that meet CoMCoP's standards. By making it clear which Parties are accredited, the CoMCoP logo should help clarify the market and support consumers in making informed decisions. The logo's availability to all relevant market segments, will further enhance its value and reach. Gowlings has provided this legal text: Proposed changes to Schedule 15 (Metering Accreditation): CoMCoP Logo requirements Interpretations and Definitions Schedule Add the following new definitions: CoMCoP Logo Trade Mark means the UK trade mark in respect of the CoMCoP Logo with registration number 3889913. CoMCoP Logo means each of the logos set out in annex A of the Metering Accreditation Schedule.

	Conflicting Brand means any name, logo or other element which may reasonably be regarded as similar to the CoMCoP Logo, including any which include the names 'CoMCoP', 'Consolidated Metering Code of Practice' or similar. Metering Accreditation Schedule Add the following new paragraph 10: 10 Use of the CoMCoP Logo 10.1 Each person that is approved (or deemed to have been approved) under this REC Schedule as a Metering Equipment Manager, AMI, EMO, AMR Service Provider and/or SIP is hereby granted a royalty-free, non-exclusive, non-transferable licence to use the CoMCoP Logos in the United Kingdom for the period of its approval as further described in this Paragraph 10. 10.2 Each approved person shall: (a) comply with any and all brand guidelines concerning the use of the CoMCoP Logo as may be issued and updated by RECCo from time to time; (b) not use the CoMCoP Logos or any Conflicting Brand in any way which damages (or which may damage) RECCo, the CoMCoP, the CoMCoP Logos or the reputation or goodwill attaching to any of them; (c) promptly notify RECCo if the approved person becomes aware of any unauthorised use of, or any infringement of any intellectual property in, the CoMCoP Logos (or any claims or actions in connection with the CoMCoP Logos); and (d) not use the CoMCoP Logos or any Conflicting Brand in any manner which RECCo reasonably considers to be misleading. 10.3 The REC PAB may determine that an approved person's licence to use the CoMCoP Logos is to be suspended or withdrawn where that person does not comply with Paragraph 10.2. For the avoidance of doubt, a failure to comply with Paragraph 10.2 may also be treated as an Event of Default under Clause 16 (Events of Default and Consequences of Default) of the Main Body of this Code. 10.4 Any person whose approval has been suspended or withdrawn in accordance with this REC Schedule

	shall immediately cease to use and desist from using the CoMCoP Logos and/or any Conflicting Brand. 10.5 The CoMCoP Trade Mark belongs to RECCo. The general licence in Clause 13.4 (REC Materials) of the Main Body of this Code shall not apply to the CoMCoP Logo. No Party other than RECCo shall attempt to register as a trade mark, or otherwise claim rights in the CoMCoP Logo or any Conflicting Brand, in any part of the world. Metering Accreditation Schedule Add the following new annex A: Annex A: CoMCoP Logos 1. 2. 3. 4.
DOES THIS ISSUE RELATE TO AN EXISTING ISSUE RAISED OR AN EXISTING CHANGE PROPOSAL? IF SO, PLEASE PROVIDE DETAILS OF THE ISSUE OR CHANGE PROPOSAL.	The introduction of the CoMCoP logo is a timely and strategically important step that will support awareness, compliance, and consumer protection as the market evolves. This change proposal is directly linked to two significant previous and ongoing change initiatives within the REC framework: 1. R0152: The implementation of R0152 was a necessary prerequisite for this proposal. R0152 addressed foundational changes to the CoMCoP, ensuring that the regulatory and operational environment was suitably robust to support the introduction of new accreditation marks such as the CoMCoP logo. Without the clarity and structure provided by R0152, it would not have been possible to proceed with the controlled release and licensing of the logo. 2. I0278: This proposal is also strategically aligned to an implementation of I0278, which aims to introduces the Safe Isolation Provider (SIP) as a standalone REC Metering Party. The launch of the CoMCoP logo will play a vital role in raising awareness of CoMCoP accreditation standards across the market, particularly as new SIPs and other accredited Parties begin to operate under the revised framework. By providing a clear, recognisable mark of quality, the logo will help stakeholders and consumers identify accredited Parties, support communications and engagement activities, and reinforce the importance of compliance with CoMCoP standards. This increased visibility is essential for a smooth transition to the new arrangements under I0278, and will help ensure that the benefits of the change (such as improved safety, consumer confidence, and market clarity) are fully realised.

3 CONSUMER IMPACTS

WHICH CONSUMER TYPES WILL BE IMPACTED BY THIS ISSUE? *(Mandatory)*	☒ All ☐ Electricity ☐ Gas ☐ Domestic Prepayment ☐ Domestic Credit ☐ Microbusiness ☐ Small and Medium Enterprise (SME) ☐ Industrial and Commercial (I&C) ☐ Other (please specify in the Additional information box below)
WHAT IMPACT WILL THIS ISSUE HAVE FOR THESE CONSUMERS? *(Mandatory)*	☐ Switching experience ☐ Billing accuracy ☒ Trust and confidence ☐ Safety ☐ Security of supply ☐ Ability to pay ☐ On site experience ☐ Achieving Net Zero ☒ Other (please provide details in the Additional information box below)
ADDITIONAL INFORMATION *(Optional)*	Introducing the CoMCoP logo will build greater trust and confidence among consumers by offering an easily recognisable accreditation mark. This logo will promote transparency and assist consumers in identifying Parties that meet CoMCoP's standards. By making it clear which Parties are accredited, the CoMCoP logo should help clarify the market and support consumers in making informed decisions. The logo's availability to all relevant market segments, will further enhance its value and reach.

DOES THIS ISSUE CONTRIBUTE TO THE ACHIEVEMENT OF NET ZERO? *(Mandatory)*	

ADDITIONAL INFORMATION *(Optional)*	

4 CODE IMPACTS

Does this Issue relate to or impact:

THE REC OR REC SCHEDULES? *(Optional)*	☐ Main Body ☒ Schedule 1 - Interpretations and Definitions Schedule ☐ Schedule 3 - Accession Agreement ☐ Schedule 4 - Company Governance ☐ Schedule 5 - Change Management ☐ Schedule 6 - Performance Assurance ☐ Schedule 7 - Energy Theft Reduction ☐ Schedule 8 - Unbilled Energy Code of Practice ☐ Schedule 9 - Qualification and Maintenance ☐ Schedule 10 - Charging Methodology ☐ Schedule 11 - Prepayment Arrangements ☐ Schedule 12 - Data Access ☐ Schedule 13 - Transfer of Consumer Data ☐Schedule 14 - Metering Operations ☒ Schedule 15 - Metering Accreditation ☐ Schedule 17 - Secure Data Exchange ☐ Schedule 18 - Green Deal Arrangements ☐ Schedule 19 - Market Exit and Supplier of Last Resort ☐ Schedule 22 - Market Stabilisation Charge ☐ Schedule 23 - Registration Services ☐ Schedule 24 - Switching Data Management ☐ Schedule 25 - Central Switching Service ☐ Schedule 26 - Switching Service Management ☐ Schedule 27 - RMP Lifecycle Schedule ☐ Schedule 28 - Related Metering Points ☐ Schedule 29 - Address Management ☐ Schedule 30 - Resolution of Consumer Facing Switching and Billing Issues ☐ Schedule 31 – Prepayment Method Levelisation Reconciliation

	☐ Schedule 32 - Electricity Supply to Hydrogen Electrolysers ☐ Schedule 33 - Non Domestic Change of Occupier
ADDITIONAL INFORMATION *(Optional)*	Legal review indicated impact to documents as follows (note, although this relates to the CoMCoP logo, no change to the actual CoMCoP is required): Proposed changes to Schedule 15 (Metering Accreditation): CoMCoP Logo requirements Interpretations and Definitions Schedule Add the following new definitions: CoMCoP Logo Trade Mark means the UK trade mark in respect of the CoMCoP Logo with registration number 3889913. CoMCoP Logo means each of the logos set out in annex A of the Metering Accreditation Schedule. Conflicting Brand means any name, logo or other element which may reasonably be regarded as similar to the CoMCoP Logo, including any which include the names 'CoMCoP', 'Consolidated Metering Code of Practice' or similar. Metering Accreditation Schedule Add the following new paragraph 10: 11 Use of the CoMCoP Logo 11.1 Each person that is approved (or deemed to have been approved) under this REC Schedule as a Metering Equipment Manager, AMI, EMO, AMR Service Provider and/or SIP is hereby granted a royalty-free, non-exclusive, non-transferable licence to use the CoMCoP Logos in the United Kingdom for the period of its approval as further described in this Paragraph 10. 11.2 Each approved person shall: (a) comply with any and all brand guidelines concerning the use of the CoMCoP Logo as may be issued and updated by RECCo from time to time; (b) not use the CoMCoP Logos or any Conflicting Brand in any way which damages (or which may damage) RECCo, the CoMCoP, the CoMCoP Logos or the reputation or goodwill attaching to any of them; (c) promptly notify RECCo if the approved person becomes aware of any unauthorised use of, or any infringement of any intellectual property in, the CoMCoP Logos (or any claims or actions in connection with the CoMCoP Logos); and (d) not use the CoMCoP Logos or any Conflicting Brand in any manner which RECCo reasonably considers to be misleading. 11.3 The REC PAB may determine that an approved person's licence to use the CoMCoP Logos is to be suspended or withdrawn where that person does not comply with Paragraph 10.2. For the avoidance of doubt, a failure to

	comply with Paragraph 10.2 may also be treated as an Event of Default under Clause 16 (Events of Default and Consequences of Default) of the Main Body of this Code. 11.4 Any person whose approval has been suspended or withdrawn in accordance with this REC Schedule shall immediately cease to use and desist from using the CoMCoP Logos and/or any Conflicting Brand. 11.5 The CoMCoP Trade Mark belongs to RECCo. The general licence in Clause 13.4 (REC Materials) of the Main Body of this Code shall not apply to the CoMCoP Logo. No Party other than RECCo shall attempt to register as a trade mark, or otherwise claim rights in the CoMCoP Logo or any Conflicting Brand, in any part of the world. Metering Accreditation Schedule Add the following new annex A: Annex A: CoMCoP Logos 5. 6. 7. 8.

OPERATIONAL DOCUMENTS *(Optional)*	☐ Consolidated Metering Code of Practice (CoMCoP) ☐ Cross Code Steering Group Terms of Reference ☐ Performance Assurance Board Terms of Reference ☐ Performance Assurance Report Catalogue ☐ REC Change Panel Terms of Reference ☐ Smart Meter Installer Domestic Customer Survey ☐ Smart Meter Installer Microbusiness Customer Survey
ADDITIONAL INFORMATION *(Optional)*	

SERVICE SPECIFICATION *(Optional)*	☐ Central Data Service Provider Further Services Service Definition ☐ Central Switching Service Definition ☐ CSS Certificate Authority Service Definition ☐ Electricity Enquiry Service - Service Definition ☐ Electricity Retail Data Service Definition ☐ Gas Enquiry Service Definition ☐ Gas Retail Data Service Definition ☐ Green Deal Database Service Definition ☐ Secure Data Exchange Service Definition ☐ Switching Operator Service Definition

ADDITIONAL INFORMATION *(Optional)*	

API TECHNICAL SPECIFICATION *(Optional)*	☐ EES API Technical Specification ☐ GES Meter Asset Enquiry API Technical Specification ☐ GES Supply Point Switching API Technical Specification ☐ GES Supply Point Enquiry API Technical Specification
ADDITIONAL INFORMATION *(Optional)*	

THE DATA SPECIFICATION *(Optional)*	☐ Data Access Matrix ☐ Data Item Catalogue ☐ Market Message Catalogue ☐ Standards Definition ☐ Supply Number Format
ADDITIONAL INFORMATION *(Optional)*	

CENTRAL SYSTEMS OR REC SERVICES? *(Optional)*	☐ Central Data Service Provider Further Services ☐ Central Switching Service (CSS) ☐ CSS Certificate Authority ☐ Electricity Enquiry Service ☐ Electricity Retail Data Service ☐ Electricity Theft Tip Off Service ☐ Gas Enquiry Service ☐ Gas Retail Data Service ☐ Green Deal Central Charging Database ☐ Secure Data Exchange Service ☐ Switching Operator
ADDITIONAL INFORMATION *(Optional)*	

REC PARTIES AND/OR MARKET PARTICIPANTS? *(Optional)*	☒ AMR Service Providers ☐ Data Aggregators ☐ Data Collectors

	☐ Data Services ☐ Smart Meter Data Retrievers ☐ DCC ☐ Distribution Network Operators ☐ Energy Suppliers ☐ EES Users ☐ Gas Transporters ☐ GDCC Users ☐ GES Users ☐ Green Deal Finance Parties ☐ Green Deal Providers ☐ Meter Asset Providers ☒ Metering Equipment Managers ☐ Shippers ☐ Third Party Intermediaries ☐ Virtual Lead Party ☐ Other (please provide details in the Additional Information box)
ADDITIONAL INFORMATION *(Optional)*	

OTHER INDUSTRY CODES? *(Optional)*	☐ Balancing & Settlement Code (BSC) ☐ Distribution Code Use of System Agreement (DCUSA) ☐ Smart Energy Code (SEC) ☐ Uniform Network Code (UNC) ☐ Independent Gas Transporter Uniform Network Code (IGT UNC) ☐ Data Integration Platform (DIP) Rules
ADDITIONAL INFORMATION *(Optional)*	

DOES THIS ISSUE IMPACT A SIGNIFICANT CODE REVIEW? *(Optional)*	No
ADDITIONAL INFORMATION *(Optional)*	

5 ISSUE PROGRESSION

DO YOU BELIEVE THIS ISSUE PROPOSAL MEETS THE CRITERIA FOR 'URGENCY' AND SHOULD BE PROGRESSED UNDER AN URGENT TIMETABLE? **IF SO, PLEASE PROVIDE JUSTIFICATION?** *(Optional)*	No Although this change is significant for market transparency and consumer trust, it does not fulfil the REC's definition of urgency. Nonetheless, implementing it promptly is preferable to coincide with the planned launch date and relevant program milestones, to support upcoming industry shifts, and to gain the most positive influence on market conduct and consumer outcomes.
ARE THERE ANY REQUIRED TIMESCALES FOR THE DEVELOPMENT OF THIS ISSUE? *(Option)*	The Solution is provided in this form, via Legal text provided by Gowlings.
ARE THERE ANY REQUIRED TIMESCALES FOR THE IMPLEMENTATION OF THIS ISSUE? *(Option)*	The CoMCoP Logo is scheduled to launch in September 2026, coinciding with the transition of the RPA Service Provider. As a result, our target date is set for no later than 1 September 2026.
ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THIS ISSUE WHICH MAY IMPACT ITS PRIORITY OR PROGRESSION TIMETABLE? *(Optional)*	The launch of the CoMCoP logo is a key component in preparing the market for I0278 Implementation. By providing a clear, recognisable mark of accreditation, the logo will raise awareness of CoMCoP standards among all stakeholders, including new Safe Isolation Providers. This increased visibility will support stakeholder engagement, facilitate change management, and reinforce consumer confidence as the market transitions to the new SIP regime. The logo's introduction is therefore essential to ensuring that I0278 delivers its intended benefits in terms of safety, quality, and market clarity.

6 ATTACHMENTS

ATTACH/PROVIDE ANY SUPPORTING DOCUMENTS TO BE SUBMITTED WITH THE FORM	