RETAIL ENERGY CODE

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REC ISSUE SUBMISSION FORM (COPY)

1 PERSONAL DETAILS

PROPOSER NAME *(Mandatory)*	David Haddock
COMPANY *(Optional)*	Wilcock Consultants Ltd
COMPANY TYPE *(Optional)*	REC Service Provider – Metering Scheme Auditor
TELEPHONE NUMBER *(Optional)*	
EMAIL ADDRESS *(Mandatory)*	davidhaddock@btinternet.com

2 ISSUE SUMMARY

ISSUE TITLE *(Mandatory)*	Introduction of Defined Electricity Metering Work Categories for Metering Accreditation
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	Currently, there are no clearly defined or standardised categories of work for electricity third-party activities within CoMCoP. This lack of categorisation reduces transparency of company capabilities and scope of work, limits the ability to align accreditation with actual operational activity and restricts the ability to apply targeted, risk-based audit assurance.
WHAT IMPACT IS THIS HAVING? *(Mandatory)*	The absence of defined categories means that: • audit activity cannot be effectively tailored to the specific competencies and risks associated with different electrical activities. • assurance over skills, qualifications and operational practices is less targeted. • gaps in capability or compliance may not be identified • documented Gas and Electricity metering requirements are not aligned

WHAT DO YOU CONSIDER TO BE AN EFFECTIVE SOLUTION? *(Mandatory)*	To address this, it is proposed that a structured set of Electricity metering work categories is introduced and embedded within metering accreditation. Suggested categories include: • Safe Isolation Provider Processes • Whole Current Single Phase • Whole Current Polyphase (includes split-phase) • Low Voltage (LV) Current Transformer (CT) /Voltage Transformer (VT) Metering • High Voltage (HV) CT/VT Metering These categories should: • Clearly define scope of activity for accredited parties • Be recorded and maintained as part of accreditation records • Apply across domestic, commercial, and industrial activity This will enable: • More targeted and proportionate audit activity • Better alignment between accreditation, capability, and delivery • Improved safety assurance across the market
IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE ISSUE THAT WOULD BE USEFUL? *(Optional)*	In gas metering and related activities, accreditation is already aligned to defined categories of work, with: • Specific audits triggered when new categories are sought • Clear records of approved scope of activity Equivalent arrangements are not currently in place for electricity metering This proposal seeks to: • Align electric accreditation with established gas practices • Introduce consistency in how capability and scope are defined and assured Consideration will be required for: • Additional audit requirements where companies extend their scope • How category data is captured, maintained, and published

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.	No

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)*	This proposal primarily impacts electricity consumers across all segments (domestic, SME, I&C). The key impact is: • Improved safety assurance, through better alignment of skills, accreditation, and audit coverage. • No direct impacts are anticipated on switching, billing, or customer experience.

DOES THIS ISSUE CONTRIBUTE TO THE ACHIEVEMENT OF NET ZERO? *(Mandatory)*	No
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 ☐ Schedule 34 - Migration Schedule
ADDITIONAL INFORMATION *(Optional)*	This proposal would primarily impact: • Metering Accreditation Schedule CoMCoP Updates would be required to: • define and embed electricity category classifications. • establish requirements for recording and maintaining category scope. Relevant codes and schedules may need review to ensure consistency of definitions and application.

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)*	This proposal would primarily impact: • Metering Accreditation Schedule CoMCoP Updates would be required to: • define and embed electricity category classifications. • establish requirements for recording and maintaining category scope. Relevant codes and schedules may need review to ensure consistency of definitions and application.

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)*	If accepted it is suggested that the appropriate codes are reviewed to include the electricity category definitions

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
SDS ALIGNMENT - HOW CLEARLY THE CHANGE SUPPORTS OFGEM'S STRATEGIC DIRECTION STATEMENT AND HELPS DELIVER SDS PRIORITIES/OUTCOMES. *(Mandatory)*	This change supports improved governance and standardisation of metering activities, aligning with broader industry priorities to strengthen assurance, consistency and consumer protection. By introducing defined electricity metering work categories, it enables clearer oversight of accredited activities and supports a more robust assurance framework.
IMPORTANCE - THE SIGNIFICANCE OF THE BENEFITS OR RISKS ADDRESSED (E.G., CONSUMER OUTCOMES, COMPLIANCE/LEGAL RISK, SYSTEM/OPERATIONAL IMPACTS, MARKET FAIRNESS). *(Mandatory)*	This change addresses a gap in how metering work is defined and categorised within accreditation arrangements. It will improve clarity for industry participants, reduce ambiguity in audit and assessment, and support more consistent application of requirements.

COMPLEXITY/ DELIVERY CONSIDERATIONS - HOW CHALLENGING IT IS TO DEVELOP AND IMPLEMENT (E.G., SCALE OF CHANGE, STAKEHOLDER ENGAGEMENT REQUIRED, SERVICE/SYSTEM IMPACTS, CROSS-CODE DEPENDENCIES, DELIVERY/TESTING RISK). *(Mandatory)*	This is expected to be low to moderate complexity. It is primarily definitional but will require updates to accreditation documentation and supporting guidance, along with stakeholder engagement. No system impacts are anticipated.
ARE THERE ANY REQUIRED TIMESCALES FOR THE DEVELOPMENT OF THIS ISSUE? *(Optional)*	There are currently: • No fixed implementation timescales • No identified dependencies Phasing could be considered to align with audit cycles and minimise delivery impact.
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ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THIS ISSUE WHICH MAY IMPACT ITS PRIORITY OR PROGRESSION TIMETABLE? *(Optional)*	No

6 ATTACHMENTS

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