RETAIL ENERGY CODE

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REC ISSUE SUBMISSION FORM (COPY)

1 PERSONAL DETAILS

PROPOSER NAME *(Mandatory)*	Ann Perry
COMPANY *(Optional)*	RECCo
COMPANY TYPE *(Optional)*	
TELEPHONE NUMBER *(Optional)*	
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2 ISSUE SUMMARY

ISSUE TITLE *(Mandatory)*	Energy Code Reform - consequential changes to the REC
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	Under new powers created by the Energy Act 2023, Ofgem are responsible for selecting and licensing Code Managers. These new entities will take on the roles currently performed by Code Panels and Code Administrators, such as making recommendations on Code Modifications. They will also take on new responsibilities, such as ensuring that the codes develop in line with Ofgem's annual Strategic Direction Statement. RECCo has been awarded a Code Manager license by Ofgem to oversee the Retail Energy Code (REC). The license will authorise RECCo to perform the function of Code Manager, facilitating the governance and development of the REC under the new statutory licensing framework.

	On 04 September 2026, Ofgem published a Statutory consultation to seeks views on proposed amendments to the Retail Energy Code and affected licences required to implement the new governance framework. The proposals address the principal changes required to introduce the new code governance arrangements, including the revised code modification process, the Stakeholder Advisory Forum (SAF), changes to existing governance arrangements and transitional provisions. A review of the wider REC baseline has identified that implementation of those changes has consequential impacts on other REC Schedules and subsidiary REC products which are not, or are not fully, addressed by Ofgem's proposed statutory modifications. Without corresponding consequential amendments, parts of the REC baseline could retain references, responsibilities, governance arrangements or processes that are inconsistent with the reformed REC arrangements. This proposal therefore seeks to progress the additional consequential changes required through the REC Change process. The proposal is not intended to revisit or amend the substantive Code Reform policy decisions being implemented by Ofgem.
WHAT IMPACT IS THIS HAVING? *(Mandatory)*	If the consequential changes are not made, the REC baseline will not be fully aligned with the governance arrangements introduced through Energy Code Reform. This could result in obsolete or inconsistent references to existing governance bodies, decision-making responsibilities, processes and terminology remaining within REC Schedules and subsidiary documents after the new arrangements take effect. This would create ambiguity over the applicable governance arrangements and could make individual REC products inconsistent with the REC provisions modified by Ofgem.

WHAT DO YOU CONSIDER TO BE AN EFFECTIVE SOLUTION? *(Mandatory)*	All REC documents categorised in the Baseline Statement should be reviewed and updated accordingly, to reflect the new arrangements being introduced as part of Energy Code Reform, and the awarding of a Code Manager License to RECCo. The changes should be limited to those necessary to ensure that affected REC Schedules and subsidiary products: • reflect the new Code Manager governance arrangements and associated responsibilities; • reflect the revised REC modification and decision-making arrangements; • remove or replace obsolete references to existing governance bodies, roles and processes; • remain internally consistent with the REC provisions modified by Ofgem; and • take effect in a coordinated manner with the implementation of the new Code Reform arrangements. The exercise should not reopen substantive policy decisions already determined by Ofgem through Energy Code Reform.
IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE ISSUE THAT WOULD BE USEFUL? *(Optional)*	Energy code reform: statutory consultation on modifications to the Retail Energy Code and affected licences
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.	This proposal arises directly from the implementation of Energy Code Reform and Ofgem's proposed statutory modifications to the REC. It is not intended to duplicate those Ofgem modifications; it addresses consequential changes to other REC products that need to be progressed through the REC Change process.

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)*	The proposal is principally a governance and legal alignment change. It is not expected to introduce direct changes to consumer journeys, rights or obligations. Consumers are affected indirectly through the effective and consistent governance of the REC.

DOES THIS ISSUE CONTRIBUTE TO THE ACHIEVEMENT OF NET ZERO? *(Mandatory)*	No
ADDITIONAL INFORMATION *(Optional)*	No direct contribution. Energy Code Reform is intended to establish a more effective governance framework through which future code changes, including those supporting the transition to Net Zero, can be progressed. This proposal itself is limited to consequential changes required to implement that governance framework.

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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)*	The Schedules identified represent the current assessment of products requiring consequential amendment. Where Ofgem is directly modifying a REC provision using its Energy Act 2023 powers, that amendment will not be duplicated through this Change Proposal. This proposal will address only the additional consequential changes required to maintain consistency across the REC baseline. Any consequential amendments identified following publication of Ofgem's final modifications will be incorporated where necessary before the solution is finalised.

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)*	
ADDITIONAL INFORMATION *(Optional)*	

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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)*	The proposal directly supports SDS Objective11.2: Reform energy code governance to enable faster, more strategically aligned rule changes across the sector which includes the below: - Implement Ofgem's new strategic functions and transition to code manager arrangements – phase 1; and - Simplification of the codes
IMPORTANCE - THE SIGNIFICANCE OF THE BENEFITS OR RISKS ADDRESSED (E.G., CONSUMER OUTCOMES, COMPLIANCE/LEGAL RISK, SYSTEM/OPERATIONAL IMPACTS, MARKET FAIRNESS). *(Mandatory)*	The change is important because it is required to ensure the REC operates coherently when the new statutory governance framework takes effect. Failure to make the consequential amendments could leave inconsistent or obsolete provisions within the REC baseline, creating legal, governance and operational ambiguity over the applicable arrangements. The principal benefit is therefore regulatory and governance certainty, rather than a direct consumer or system benefit. This change delivers noticeably greater regulatory benefit than most other Standard changes.
COMPLEXITY/ DELIVERY CONSIDERATIONS - HOW CHALLENGING IT IS TO DEVELOP AND IMPLEMENT (E.G., SCALE OF CHANGE, STAKEHOLDER ENGAGEMENT REQUIRED, SERVICE/SYSTEM IMPACTS, CROSS-CODE	Complexity – Low complexity – Legal text changes only with no impact to Parties.

DEPENDENCIES, DELIVERY/TESTING RISK). *(Mandatory)*	
ARE THERE ANY REQUIRED TIMESCALES FOR THE DEVELOPMENT OF THIS ISSUE? *(Optional)*	Yes, will need to be implemented at the same time as the Code Manager License is awarded to RECCo, which is expected early to mid- December.
ARE THERE ANY REQUIRED TIMESCALES FOR THE IMPLEMENTATION OF THIS ISSUE? *(Optional)*	Yes, will need to be implemented at the same time as the Code Manager License is awarded to RECCo, which is expected early to mid- December.
ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THIS ISSUE WHICH MAY IMPACT ITS PRIORITY OR PROGRESSION TIMETABLE? *(Optional)*	Yes. The key dependencies are: • Ofgem's final decision and direction on the statutory modifications to the REC following the September 2026 consultation; • confirmation of the effective date for the new REC governance arrangements and REC designation; • coordination with other REC changes or document updates that are expected to take effect at or around the Code Reform implementation date. Any change to Ofgem's final drafting or implementation timetable may affect the scope or timing of this proposal.

6 ATTACHMENTS

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