RETAIL ENERGY CODE

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REC ISSUE SUBMISSION FORM (COPY)

1 PERSONAL DETAILS

PROPOSER NAME *(Mandatory)*	Ann Perry
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COMPANY TYPE *(Optional)*	Code Body/ Administrator
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2 ISSUE SUMMARY

ISSUE TITLE *(Mandatory)*	Implementation of Ofgem-led code modification prioritisation within the REC
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	Ofgem has consulted on, and is progressing towards a decision on, the introduction of a harmonised code modification prioritisation framework across all industry codes, under its transitional powers in Schedule 12 to the Energy Act 2023. The REC does not currently reflect the proposed prioritisation framework. In order to give effect to Ofgem's decision once made, changes will be required to the REC to introduce consistent prioritisation criteria, prioritisation categories, governance arrangements and associated reporting obligations. This Issue is being raised to provide the formal REC change vehicle through which Ofgem's prioritisation reforms can be tracked, developed and implemented in the REC, once the Authority has published its decision and statutory modification notice.

WHAT IMPACT IS THIS HAVING? *(Mandatory)*	In the absence of REC changes, the Retail Energy Code would not align with Ofgem's harmonised approach to code modification prioritisation, creating inconsistency with other industry codes and undermining the objectives of energy code reform. Ofgem has indicated that a harmonised prioritisation framework is intended to: • support more efficient governance of code modifications; • enable industry to focus resources on higher-priority changes; • support implementation of the Strategic Direction Statement (SDS); and • facilitate transition to future code manager arrangements. Failure to implement the required REC changes would limit the REC's ability to operate consistently within the reformed code governance framework.
WHAT DO YOU CONSIDER TO BE AN EFFECTIVE SOLUTION? *(Mandatory)*	Subject to Ofgem's final decision and statutory modification notice, the effective solution is to implement the harmonised code modification prioritisation framework within the REC. This will require: • amendments to REC Schedule 1 (Interpretations and Definitions); • amendments to REC Schedule 5 (Change Management); • updates to the REC Change Panel Terms of Reference; • incorporation of the Authority's prioritisation criteria, categories and governance requirements; and • identification and implementation of any consequential changes required to REC operational documents, guidance, tools and processes (e.g., updates to Wiki articles, User Guides, REC Portal pages and Change submission forms) This Issue / Change Proposal will act as the formal REC mechanism to co-ordinate, track and deliver those

	changes in line with Ofgem's decision and implementation timetable. Changes to processes impacting REC Parties will be communicated via the Release process
IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE ISSUE THAT WOULD BE USEFUL? *(Optional)*	This Issue relates to Ofgem's energy code reform programme and its statutory consultation and proposed decision on harmonised code modification prioritisation. Decision on the preliminary Strategic Direction Statement and governance arrangements for industry codes Energy code reform programme – statutory consultation (20 Nov 2025) Annex A: Proposed legal drafting of code modification prioritisation procedure Annex B: Definitions to form future guidance on code modification prioritisation
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)*	

DOES THIS ISSUE CONTRIBUTE TO THE ACHIEVEMENT OF NET ZERO? *(Mandatory)*	Yes Ofgem Strategic Direction Statement
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)*	

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)*	The schedules and operational documents identified above reflect those for which Ofgem has provided proposed legal drafting to date. Further REC documents, tools or guidance may require consequential updates and will be identified and progressed as part of this Issue/ Change Proposal.

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
ARE THERE ANY REQUIRED TIMESCALES FOR THE DEVELOPMENT OF THIS ISSUE? *(Option)*	The transitional powers provided by the Energy Act 2023 give Ofgem the ability to modify licences and codes, and these powers will be used for changes to Schedules 1, 5 and the Change Panel ToR. A statutory decision and modification notice is expected following completion of the consultation process. Implementation could be from 1st April 2026 onwards. This Issue is being raised in advance to ensure the REC has a ready change vehicle to progress the necessary updates once Ofgem's decision is confirmed.

ARE THERE ANY REQUIRED TIMESCALES FOR THE IMPLEMENTATION OF THIS ISSUE? *(Option)*	As above
ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THIS ISSUE WHICH MAY IMPACT ITS PRIORITY OR PROGRESSION TIMETABLE? *(Optional)*	

6 ATTACHMENTS

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