RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED INFORMATION REQUEST RESPONSES

I0335 – INTRODUCTION OF DEFINED ELECTRCITY METERING WORK CATEGROIES FOR METERING ACCREDITATION

On 01 October 2026 the Code Manager issued an information request to industry to seek feedback on the Issue I0335.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

DOCUMENT VERSION	V0.1
RESPONSE TYPE	Non-Confidential
DATE ISSUED	03 November 2026
RESPONSIBLE COMMITTEE	Metering Expert Panel
LEAD ANALYST	Poppy Mullins

DATE INFORMATION REQUEST ISSUED	01 October 2026
RESPONSE DEADLINE	23 October 2026

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Question 1:	Do you have any objection to reinstating and clearly defining the existing electricity metering classifications?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Mua Group (DNO)	No objections to reinstating and clearly defining the existing electricity metering classifications	Thank you for your comments.
SMS (MEM)	No	Thank you for your comments.
Diversity Electricity Ltd (MEM)	No objection. Diversity Electrical Ltd is currently in Entry Assessment to become a Safe Isolation Provider (application APP9040162279). Clearly defined classifications would give applicants and auditors a shared understanding of the scope being accredited, which is currently unclear for SIP-only applicants.	Thank you for your comments.
OVO (Energy Supplier)	No objection in principle, subject to practical implementation. OVO supports having clearly defined, standardised electricity metering classifications in the Consolidated Metering Code of Practice (CoMCoP) to align governance and audit triggers with the existing gas metering framework. Setting out clear boundaries helps maintain regulatory clarity, quality standards, and customer safety across Meter Operator Agents (MOAs) and Electricity Metering Operatives (EMOs). However, our support depends heavily on how these classifications are structured and audited at a business level. The CoMCoP audit is a business audit designed to qualify an organisation to carry out a specific	Thank you for your comments. CoMCoP audit provides overarching assurance at a business level, but it also considers compliance with the relevant requirements at site level. It is important to remember that CoMCoP consolidates a number of previous codes and arrangements, including MOCOP and requirements relating to the operation, maintenance and installation

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	work category based on its internal policies, training programmes, and competence pathways. Any reinstatement must avoid creating artificial category divisions that trigger repeated, costly business audits where an organisation already possesses robust, established competence frameworks (as detailed in our responses to Questions 2 and 4).	of equipment on distribution networks as well as the obligations under licence conditions. While the audit assesses the business overall, site-level audits provide assurance that activities are being undertaken appropriately. The proposed categories are intended to help define the scope of those activities and, where relevant, enable auditors to understand the authorisation and competency framework applied by the business. This does **not** mean that businesses will be expected to adopt these categories where they do not already use them, nor does it mean every category will be assessed during every audit. The intention is to provide greater clarity where businesses, DNOs or competency frameworks distinguish between different types of work and associated authorisations. For example, where an operative is authorised by their business or DNO to work only on single-phase supplies, but a site audit identifies them undertaking work outside that scope, the auditor needs to be able to recognise that the operative may be working beyond their authorisation.

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		The categories therefore support effective sampling and allow auditors to understand the scope of a business's activities and authorisation arrangements. They are not intended to create unnecessary or additional audits, or to replace existing company processes, procedures or competency frameworks. Ultimately, CoMCoP assurance is not simply about checking that an authorisation process exists. It provides assurance that activities are being undertaken in accordance with the relevant requirements, codes and arrangements that apply.

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Question 2:	Do you have any objection on the proposed electricity metering work categories?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Mua Group (DNO)	No objections to the proposed electricity metering work categories	Thank you for your comments.
SMS (MEM)	No	Thank you for your comments.
Diversity Electricity Ltd (MEM)	No objection, and we strongly support the introduction of Category D (Safe Isolation Provider). At present a SIP must be accredited as an EMO under CoMCoP, whose scope is written around meter installation, exchange and removal work a SIP will never carry out. A dedicated Category D allows the audit and training evidence to focus on the competencies that actually apply and makes the route proportionate for small electrical contractors serving housing providers and landlords.	Thank you for your comments.
OVO (Energy Supplier)	**Yes, we have clear objections to separating Categories A and B, and we recommend providing the option to combine Category C**. The CoMCoP audit is an overarching business audit that assesses a company's policies, operating procedures, and competence pathways to authorise them to undertake a specific work type. Each business already maintains detailed internal training, assessment, and authorisation pathways to ensure its operatives are fully competent. Splitting whole current metering across three narrow categories creates	Thank you for your comments and feedback. For clarity, the existence of separate work categories does not of itself mean that separate business audit events would be required for each category. Audit scope and sampling should be proportionate to the activities undertaken by the business and the assurance required.

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	artificial business barriers and repeated audits without adding safety value. Specifically: 1. C**ategory A (Whole Current Single Phase) and Category B (Whole Current Single Phase off Polyphase) must be combined.** Both are fundamentally single-phase metering works. A business that demonstrates robust training, safety procedures, and competence pathways for single-phase metering covers both setups. Requiring an organisation to undergo a separate business audit simply to add Category B after already being audited for Category A is completely unnecessary. 2. **There should be the option to combine Category C (Whole Current Polyphase)** into a comprehensive "Whole Current" business accreditation. A business that sets up and maintains accredited training and competence pathways for whole current metering can effectively govern single-phase, single-phase off polyphase, and polyphase work under one unified business assurance framework. **Rationale & Practical Operational Concerns:** **1. Categories A and B are Both Single-Phase Metering Works**: a. In both Category A and Category B, the operative works on a 230V single-phase whole current meter. b. While Category B involves a polyphase service head (such as in communal risers or multi-occupancy properties), the metering installation, testing, and isolation steps remain single-phase.	Working on a single-phase meter forming part of a multi-phase supply is still considered a single-phase installation. However, there may be additional considerations and risks that operatives need to understand. Where a business has addressed those risks through its training, competency and authorisation arrangements, and authorises its single-phase operatives to work on single-phase meters across different supply arrangements, that remains a matter for the business. The intention is not to change or override those existing processes. However, some businesses distinguish between these activities within their authorisation frameworks because of the additional risks that can arise, including shared neutrals and circumstances where an operative may need to remove more than one fuse. In those situations, some businesses may consider the activity to extend beyond their defined single-phase scope. We recognise that businesses take different approaches and appreciate the points raised. These will be considered as the proposals develop. The purpose of the categorisation is therefore to support a clearer understanding of the

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	c. At an organisational level, a business's training curriculum and safe systems of work for single-phase metering readily encompass both situations. Forcing a company to pass an initial business audit for Category A and then book a second business audit months later to do Category B places an unnecessary regulatory and financial burden on the business. 2. **Potential to Combine Category C (Whole Current Polyphase):** a. Metering organisations delivering domestic and light commercial programmes typically run structured training and competence pathways that span both single phase and three-phase whole current work. b. If a business is already audited and approved to deliver polyphase whole current work (Category C), its management systems, technical oversight, and operative competence pathways have already proven compliance at the highest level of whole current work. c. Offering a combined "Whole Current Core" business accreditation allows an organisation to be audited once on its whole current capability, instead of having to schedule multiple sequential business audits as commercial requirements expand. 3. **Safe Isolation Provider (SIP) Scope (Category D):** a. Safe Isolation Provider (SIP) business accreditation must explicitly cover both single-phase and polyphase cut-outs up to 100A under one category.	scope of activities being undertaken at site level. The work categories provide a consistent means of defining and assuring that scope; they do not replace or prescribe a business's competency, training or authorisation framework. It is not intended to require businesses to change their existing training or authorisation arrangements where they are satisfied that these appropriately manage the relevant risks and competencies. However, we also need to recognise the different approaches adopted across industry and, where appropriate, seek greater alignment with the practices used by businesses, DNOs and training providers. Similarly, while both single-phase and multi-phase installations may fall within whole-current work, there are clear differences in the scope, competency and technical understanding required, particularly where installation commissioning is involved. Considerations such as phase rotation, greater voltage and unique supply compositions (2-phase, split phase), neutral arrangements and reverse polarity can introduce greater risks to businesses, property and individuals. This supports the

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		rationale for distinguishing between single-phase and multi-phase activities. This approach also better aligns with the authorisation and competency frameworks used by DNOs, training providers and a number of existing market participants. Again, this is not intended to detract from or replace individual business processes or authorisation arrangements. Rather, the distinction helps establish an appropriate audit scope where necessary. Where a business undertakes a range of activities across single-phase, multi-phase and CT installations, the audit framework should enable appropriate sampling across those areas, where necessary and practical, to provide assurance that the relevant processes and requirements are being followed.

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Question 3:	**Do you have any objection on the proposed labelling approach for the electricity work categories set out in the Solution Overview section?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Mua Group (DNO)	No objections to the proposed labelling approach	Thank you for your comments.
SMS (MEM)	No	Thank you for your comments.
Diversity Electricity Ltd (MEM)	No objection. Using letters avoids confusion with the numbered gas categories.	Thank you for your comments.
OVO (Energy Supplier)	**Neutral / Qualified Objection.** While using letters (Category A through F) stops direct confusion with gas numerical categories, plain letters do not provide immediate operational clarity for business planning, system configuration, or field dispatch. • **Suggested Alternative**: We recommend using plain, descriptive prefixes (such as E-WC for Electricity Whole Current, E-SIP for Safe Isolation Provider, E-LV-CT for Low Voltage CT, and E-HV-CT for High Voltage CT). • **Dual-Fuel Alignment**: For businesses managing dual-fuel teams, clear labels that distinguish Electricity (E-) from Gas (G-) make it much simpler to align internal competence pathways, audit records, and workforce management systems.	Thank you for your comments and we take on board your distinctions. While the categories help define the type of installation and supply at site level, they will also be incorporated into CoMCoP under the "Work Category" column, aligning the approach with gas and identifying distinctions at clause level where appropriate. A supporting appendix will provide a fuller description of each category and its intended application. As previously noted, this is not intended to require businesses to change their existing systems, planning arrangements or operational processes. Rather, the categories provide greater clarity and consistency,

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		helping both parties and auditors to more easily interpret the scope and relevance of applicable CoMCoP requirements. For now, this change applies specifically to electricity, as gas categories are already defined using a numeric classification. If there is a future need to align the terminology across gas and electricity, including the use of G and E identifiers, this would require a further change and consideration of the associated gas categories appendix.

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Question 4:	**Do you consider the proposed categories to be complete? If not, please identify any additional categories that should be considered for inclusion and provide the rationale for your response.**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Mua Group (DNO)	No additional categories to propose	Thank you for your comments.
SMS (MEM)	Happy with it as it is set out in the proposed changes.	Thank you for your comments.
Diversity Electricity Ltd (MEM)	Broadly yes, with one suggestion on the wording of Category D. The scope is currently described as "withdrawing and reinserting cut-out fuses". DCUSA Section 2H also permits a SIP, where necessary, to adjust meter terminals and re-make connections, and to terminate or replace customer tails at the meter. The Category D definition should reflect that full permitted scope so that accreditation matches the legal scope of work. It should also state whether Category D covers both single-phase and polyphase whole-current cut-outs, since domestic and small-commercial SIP work includes both.	Thanks you for your comments. The categories are intended to provide clarity on the scope of activities for CoMCoP accreditation and assurance purposes rather than redefine the activities permitted to a SIP. We will, however, review the Category D wording against the applicable DCUSA provisions to ensure the terminology and scope are appropriately aligned and do not create ambiguity.”
OVO (Energy Supplier)	**Incomplete in structure**. While the technical range from whole current up to high voltage CT/VT covers the necessary asset types, the categories need to reflect how businesses build and audit competence: 1. **Merge Categories A and B as Standard:**	Thank you for your comments. The proposed categories are intended to define the scope of site-based activities, both in terms of the applicable CoMCoP requirements and to support a proportionate approach to determining audit scope.

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	Categories A and B must be merged into a single "Whole Current Single Phase" category covering both dedicated single-phase supplies and single-phase feeds off polyphase services. A single business audit covering the organisation's single-phase training framework and field procedures is all that is required. 2. **Provide a Unified Whole Current Category Option (incorporating Category C):** The code must provide for an integrated Whole Current business accreditation (covering A, B, and C up to 100A). Businesses that have established training and qualification pathways for both single and three-phase whole current metering should be able to gain business accreditation through a single, comprehensive audit event. 3. **Clarify Category D (SIP) to Cover Single and Polyphase**: The scope for Category D must state explicitly: "*Withdrawing and reinserting cut-out fuses on single-phase and polyphase Whole Current Supplies with fuse ratings not exceeding 100A*." This ensures a business's safe isolation procedures cover all whole current cut-outs under a single audit and accreditation.	The categories also align with distinctions already used by some DNOs, training and qualification providers, and a number of parties within their existing authorisation arrangements. As previously noted, there would be no requirement for businesses to adopt these categories within their own internal processes. We recognise that businesses take different approaches to authorisation, competency assessment and training, and the proposed categories are not intended to change or override these arrangements. In relation to Category D, we agree that the definition should be clearer in its application to whole-current activities more broadly. We will therefore look to amend the wording to make this distinction more explicit.

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Question 5:	Do you have any other comments you would like to add?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Mua Group (DNO)	We recognise that the review will need to be sufficiently robust to prevent issues experienced during previous code consolidation activities, where obligations and requirements that were not previously applicable became applicable, creating unintended impacts for a number of MEMs. As part of this process, we would welcome assurance that appropriate controls, impact assessments and stakeholder engagement activities are being undertaken by the REC to proactively identify and mitigate such risks.	Thank you for your comments. We acknowledge and share the concerns raised. The REC remains committed to open and meaningful engagement as these proposals develop. The I0335 Information Request and re-introduction of defined electricity work categories are intended to support further improvement, greater clarity and closer alignment with established industry standards and practices. We will ensure that appropriate and proportionate measures are applied, taking account of stakeholder feedback and the differing approaches currently used across industry.
SMS (MEM)	No	n/a
Diversity Electricity Ltd (MEM)	We would welcome early guidance on how existing SIP applicants in Entry Assessment will be transitioned to Category D once implemented,	Thank you for your comments.

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	so that audits already in progress are assessed against the appropriate scope rather than the full EMO scope.	There would be no formal transition required for parties, as the categories would apply within the existing framework. Their primary purpose is to provide greater clarity on the scope of site-level activities, including installation and physical SIP activities. Businesses may choose to use the categories to support their own internal authorisation structures or documentation; however, this is not an obligation or intended requirement. For gas, the relevant CoMCoP clauses are already mapped to the applicable categories where appropriate. The same approach would be applied to the electricity categories, helping parties and auditors identify the clauses relevant to each scope of activity. This will also support the wider CoMCoP audit framework by providing greater clarity on the scope of field activities and enabling more proportionate, relevant and consistent audit sampling, where appropriate.
OVO (Energy Supplier)	**Recognising Internal Competence Pathways and Grandfather Rights:** **1. Focus Audits on Business Systems and Pathways:**	Thank you for your comments. Please see the Code Manager's comments responding to Q1.

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	CoMCoP audits should assess whether the business has the appropriate governance, technical specifications, and training and assessment pathways in place to manage the work type. Once a business is accredited for a work category, the delivery of that work should rely on the business's internal competence assurance pathways without triggering repetitive external business audits. 2. **Grandfather Rights for Existing Accreditations:** Clear transitional and grandfathering rules are essential. MOAs and EMO businesses currently active in the market with approved training frameworks and audit track records under MOCoPA / CoMCoP should have their existing accreditations transferred directly across to the equivalent new categories without requiring re-auditing. 3. **Adequate Lead Time**: Businesses will need sufficient notice and lead time to align their internal training documentation, operational authorisations, and tracking systems with the finalised CoMCoP categories before audit requirements take effect	

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