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01	Proposal Plan
02	Impact Assessment
03	**Consultation**
04	Final Recommendation

CHANGE REPORT

R0252 – INCREASING FREQUENCY OF ANNUAL PORTFOLIO RECONCILIATION EXERCISE TO SUPPORT DATA CLEANSE

DOCUMENT VERSION	1.0
PROPOSED IMPLEMENTATION DATE	26 February 2027
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	REC Change Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	Standard	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Meter Asset Managers, CDSP, REC Performance Assurance		

LEAD ANALYST (SOLUTION LEAD)	ASSURANCE LEAD	TECHNICAL LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

This Issue seeks to explore making changes to both the frequency and turnaround time of the Gas Annual Portfolio Reconciliation exercise conducted by the Central Data Service Provider (CDSP) using data provided by Metering Asset Managers (MAMs).

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the REC Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 26 February 2027.

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BACKGROUND

1 SUMMARY

Every year in April, Metering Asset Managers (MAMs) are required by REC Schedule 14 – Metering Operations to submit selected Data Items for each Metering Asset in their portfolio to the Central Data Service Provider (CDSP) for the purposes of a reconciliation. The CDSP compares the Data Items submitted by the MAM to their own copies of these Data Items for any given Metering Asset, and in this way, discrepancies are identified. These discrepancies are then reported to the REC Performance Assurance team, who work with MAMs to resolve them.

The Proposer has identified two issues with this process. Firstly, the reconciliation exercise is not frequent enough, taking place only once a year. In their view, an annual reconciliation is not sufficient to maintain gas Data Item quality, and that a higher frequency is required in order to address Data Item mismatches more often. Accordingly, they have asked the Code Manager to explore the possibility of increasing the frequency to twice yearly. Secondly, the turnaround time of the reconciliation data by the CDSP currently takes several months – MAMs historically have received the reconciled data set between August and October, following submission in April. Such a large gap between submission and reconciliation may allow for the Data Items to "drift" in the intervening period due to changes in Metering Asset, for example. This may result in inaccuracies arising within the reconciled data set. The Proposer has asked the Code Manager to explore reducing this turnaround time.

2 PROBLEM STATEMENT

The annual portfolio reconciliation exercise conducted by the CDSP on MAM-held Data Items is neither frequent enough nor is it expeditious enough, according to the Proposer. MAMs are being asked to reconcile Data Items several months after they were initially provided, which may impact the efficacy of the exercise if these Data Items have changes since they were initially submitted.

3 IMPACTS

CONSUMERS
N/A

REC SERVICE PROVIDERS
CDSP

REC DOCUMENTS / PRODUCTS
Schedule 14 – Metering Operations
CDSP Further Services Service Definition

REC PARTIES AND SERVICE USERS
Meter Asset Managers (MAMs)

RECCO / REC CODE MANAGER
REC Performance Assurance

MHHS
N/A

No Consumer impact has been identified.

MAMs will be impacted by this Issue as they will be expected to submit data to the CDSP on a more frequent basis, and the overarching requirements relating to their data submission practices may be subject to change.

The CDSP will be impacted as they will be expected to perform the reconciliation exercise on a more frequent basis.

REC Performance Assurance functions will be impacted as they will be conducting the post-reconciliation work with MAMs to resolve discrepancies in submitted Data Items on a more frequent basis.

If the problem statement is resolved, there will be a net positive benefit for both Consumers and for REC Parties who utilise gas data. The Consumer benefit will arise indirectly from more accurate data associated with their Supplies resulting in fewer Consumer-facing Switching & Billing issues. The REC Party benefit will arise from access to more reliable gas data.

4 CROSS-CODE IMPACTS

No Cross-Code impacts have been identified.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**13 May 25**	**07 Apr 26**
	Solution Analysis	Complete	Complete
	Solution Development	Complete	Complete
	Legal Drafting	Complete	Complete
	Impact Assessment	Complete	Complete
Change Proposal		**08 Apr 26**	**31 Jan 27**
	Business Case Assessment	April	September
	Consultation	December	January
	Solution Refinement	January	January
	Final Determination	January	January
Voting		**01 Feb 27**	**01 Feb 27**
	Appeal Window	02 February	16 February

NB – The above Proposal Plan was approved by the REC Metering Expert Panel at their meeting in October 2026. That document is available to view here.

Since publishing the above plan, the Code Manager has determined that an expedited progression is possible that would target a decision at the REC Metering Expert Panel on 11 November 2026 to approve the change for consultation, with a final vote at the REC Change Panel on 01 December 2026. This is ahead of the changes to REC Change Management governance resulting from Ofgem's Code Reform programme in December 2026.

To achieve this, the consultation period will be shortened to 10 Working Days and the REC Change Panel paper will be submitted after the standard deadline, with the agreement of the REC Change Panel Chair. The Code Manager is targeting the 01 December meeting of the REC Change Panel and intends to publish the paper on 26 November 2026.

6 STAKEHOLDER ENGAGEMENT

The Code Manager will engage with affected industry stakeholders as required. The Code Manager raised this Issue at the REC Change Issues Group in November 2025 in order to discuss the proposed solution with affected industry stakeholders.

No Meter Asset Managers responded to the Party Impact Assessment. Given the shortened consultation period, the Code Manager will engage directly with MAMs during the consultation, including through the Gas Operational Metering Forum and Operational Account Managers, to ensure that the views of the Parties carrying the obligation are captured before the final vote.

7 PRIORITY STATUS AND URGENCY

7.1 PROPOSER REVIEW

This Change Proposal was submitted prior to 29 May 2026, the implementation of the Ofgem Code Prioritisation Harmonisation. There was no requirement for the Proposer to provide their review of the Prioritisation Category and Urgency when this was Change Proposal was submitted.

7.2 CODE MANAGER REVIEW

The Code Manager is proposing this Change Proposal be given an Urgency Status of Standard and a Prioritisation Category of Standard.

The Code Manager believes this Change Proposal:

- Does not meet the Ofgem criteria for Urgency;
- Has a weak alignment to the Strategic Direction Statement as it has limited or no SDS relevance when compared to other Standard changes;
- Has low importance as it delivers limited or niche benefits compared to other Standard changes; and
- Has a low complexity.

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SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

The Code Manager engaged with REC Performance Assurance, CDSP, and Operational Account Managers in order to determine how best to resolve the problem statement. During the course of these discussions, the scope of problem broadened. Initially, the Code Manager only sought to increase the frequency of the reconciliation, from annual to biannual. However, following further analysis with REC Performance Assurance, the need to reduce the turnaround time of the reconciliation (i.e., the length of time from MAM submission to the CDSP to the CDSP passing the reconciled data set to REC Performance Assurance) also became apparent.

The Code Manager worked with both the CDSP and internally with its Performance Assurance function to understand the existing operational requirements underpinning the Reconciliation arrangements. The Code Manager determined based on these conversations that the reduced timescales for the reconciliation are viable for both the CDSP and for REC Performance Assurance (this was subsequently tested through the Service Provider Impact Assessment described in section 11, and is subject to the dependency set out in section 12).

During the course of solution analysis, the CDSP made the Code Manager aware that a significant factor in the current long turnaround time of the reconciliation is because, anecdotally, some MAM Parties do not fully comply with their existing obligations to submit their data to the CDSP within 15 Working Days (WDs). As a result, the CDSP have an incomplete market-wide data set, and their ability to conduct the reconciliation is hampered as a result. Time is then spent engaging with MAMs to encourage them to submit data, rather than conducting the reconciliation itself.

8.1 PERFORMANCE ASSURANCE SOLUTION

The Code Manager conducted a Service Provider Impact Assessment with the CDSP (see section 11 for further details) where it was determined that a more robust Performance Assurance approach in respect of the 15WD deadline for MAMs to submit their Data Items to the CDSP is required. The CDSP indicated that they could not deliver the proposed solution without additional confidence that MAM data would be submitted by the required deadline. As a result, the REC Party Assurance function of the Code Manager was approached, and they produced a proposal for an assurance approach. This approach utilises both REC Party Assurance functions as well as those of the Code Manager's Operational Account Management functionality.

The Code Manager has confirmed that no changes to the REC would be required to facilitate the more robust approach needed to underpin the proposed solution. The Code Manager engaged internally with the Performance Assurance function and ascertained that the proposed solution is consistent with the scope of the existing framework of Assurance obligations, i.e., no changes to the Retail Risk Register is required, and the only change to the Performance Assurance Report Catalogue (PARC) is the consequential update to the reporting frequency set out in the Proposed Solution section below.

9 PROPOSED SOLUTION

9.1 CDSP & MAM OBLIGATION CHANGES

The Code Manager is proposing changes to both REC Schedule 14 – Metering Operations and the Central Data Service Provider Further Services Service Definition to achieve the following aims:

- Increase the frequency of the reconciliation by introducing an additional occurrence in October of each year. This would result in two reconciliations a year, six months apart, one in April and one in October.
    - To facilitate this, the Code Manager has proposed drafting to change references from Annual to Biannual.
    - It is therefore proposed that the Gas Annual Portfolio Reconciliation will be instead referred to as the Gas Biannual Portfolio Reconciliation.
        - Consequential changes to the Data Specification to update the naming convention will also be delivered.
- Reduce the time it takes from MAMs first submitting their data to the CDSP to the CDSP finishing the reconciliation and handing over the completed data set to REC Performance Assurance.
    - To do this, the Code Manager is proposing reducing the reconciliation overall completion time from 75WDs to 40WDs, where:
        - MAMs have 15WDs to submit their data sets to the CDSP
            - This is not changing – MAMs currently have 15WDs in the live version of Schedule 14, and this is not proposed to change as part of the R0252 solution. However, this will be supported by a new Performance Assurance approach – please refer to the Performance Assurance Solution set out below for more details.
        - The CDSP have 20WDs to complete the reconciliation and return the results to the REC Code Manager.
- Changes have also been proposed to the Performance Assurance Report Catalogue (PARC), as the reconciliation outputs provided by the CDSP to downstream Parties currently has a frequency of “Annually”.

9.2 PERFORMANCE ASSURANCE SOLUTION

To support the proposed reduction in the reconciliation period from 75 WDs to 40 WDs, the Code Manager has developed an enhanced Party Assurance process aimed at improving compliance with the existing 15 WD Metering Asset Manager (MAM) data submission obligation. The process would operate as follows:

1. **Pre-submission readiness activities:** Ahead of each April and October reconciliation cycle, REC Performance Assurance and Operational Account Managers (OAMs) would undertake targeted engagement with MAMs. This would include communications, webinars, guidance material, submission support sessions and readiness assessments based on factors such as previous submission issues, webinar attendance and OAM

judgement. MAMs identified as higher risk would receive targeted intervention from both REC Performance Assurance and OAMs.

2. **Submission period:** MAMs would continue to have 15 WDs to provide portfolio data to the CDSP. This obligation is unchanged from the current arrangements. OAMs, REC Performance Assurance and the CDSP would maintain regular engagement throughout the submission window to monitor progress and identify emerging issues.
3. **Initial remediation:** Where a MAM fails to provide a correct submission by WD15, a provisional notification of non-compliance would be issued and a 5 WD extension granted to allow the issue to be rectified.
4. **Formal escalation:** Where a valid submission has not been received by WD21, a final notification of non-compliance would be issued and the MAM would be required to provide a management assertion explaining the non-compliance.
5. **Performance Assurance escalation:** Where the required management assertion is not received, the matter would be escalated to the Performance Assurance Board (PAB). OAMs would continue engagement with the affected MAM alongside REC Performance Assurance as part of the escalation process.
6. **Future monitoring:** MAMs experiencing non-compliance or submission issues would be added to a target list for future reconciliation cycles, allowing OAMs and REC Performance Assurance to focus future readiness and engagement activities on organisations with a history of submission issues.

9.3 DESCOPED SOLUTIONS

The Code Manager had considered a novel solution whereby both the CDSP and MAM Parties would submit their respective data sets directly to the REC Code Manager, who would conduct the Reconciliation in their stead. This would have made use of the re-procurement of the REC Portal, and explored hosting the required logic underpinning the Reconciliation inside a new feature of the REC Portal.

However, this solution option was discounted following a conversation with RECCo where it was deemed that the relative complexity of this novel approach was likely to outweigh any perceived benefits relative to the current Proposed Solution.

9.4 NOVEL IMPLEMENTATION APPROACH

The Code Manager is proposing an implementation approach in which the February 2027 release will be targeted for a “big bang” model, but with a 12-month post-implementation review period. Due to difficulties in establishing a quantifiable benefits case (please refer to Section 13 for more details), the Code Manager is proposing that the real-terms benefits arising from a year of the proposed solution be examined in 2028 to determine if the Change has been cost-effective. The review will be undertaken by the Code Manager and its outcome will be reported to the Performance Assurance Board. Should the review conclude that the solution has not been cost-effective, the Code Manager will raise a new Modification Proposal to amend or revert the arrangements; the review does not of itself change the REC.

10 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0252 can be found here.

11 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

11.1 SERVICE PROVIDER IMPACT ASSESSMENTS

A REC Service Provider impact assessment was conducted from 12 February 2026 to 06 March 2026, targeting the CDSP. The Code Manager aimed to determine the impact on the CDSP of completing the reconciliation at both a higher frequency and on a faster turnaround.

The key points of the response are as follows:

Cost:

The CDSP indicated that they would incur costs as a result of the proposed solution. By completing the reconciliation a second time, they would incur the costs twice in one year rather than one, doubling their existing costs in respect of the Reconciliation activity. They indicated an ongoing cost of £15K-£17K per year, with no upfront build or design costs.

Lead time:

The CDSP indicated that they would be able to implement the proposed solution from October 2026 onwards. As such, the Code Manager is targeting the February 2027 release (26 February 2027).

RAID:

The CDSP indicated that their ability to deliver the report at a reduced turnaround time is dependent on an enhanced Performance Assurance approach in respect of MAM data submission. They said that their primary limiting factor in completing the reconciliation is receiving data from MAMs; where MAMs do not submit data on time, the CDSP are limited in their ability to complete the reconciliation due to incomplete data sets.

As a result, the CDSP indicated that they will only be able to deliver reconciliation reports are the proposed 40WD turnaround if REC Performance Assurance take a more robust approach to ensuring that MAMs submit their data to the CDSP within the 15WD deadline.

Comments on the proposed solution:

CDSP queried whether the proposed solution would allow for Suppliers to receive the reporting at the new speed and frequency. The Code Manager can confirm that this is the intention – the arrangements relating to the usage of the reconciliation report are to remain the same.

11.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was conducted from 12 February 2026 to 06 March 2026. In total two responses were received, from Energy Suppliers. No responses were received from Meter Asset Managers. The non-confidential responses have been published here.

The key points of the responses are as follows. Both respondents:

- Supported the proposed solution;
- Supported the proposed legal text.
- Did not identify any lead time; and

- Did not identify any quantifiable benefits, instead identifying intangible benefits.

One respondent indicated that they would support seeing changes to Data Items in the reporting set to capture installation dates of Metering Assets. The Code Manager has confirmed that this is out of scope of R0252, but may explore this as part of the post-approval review activities conducted to determine the efficacy of the proposed solution.

The other respondent suggested that the reconciliation may be conducted on a quarterly basis rather than biannually, as proposed. The Code Manager confirmed that this is not currently being explored as the reduction in report turnaround time in conjunction with the increased frequency is likely to increase CDSP's operational complexity, and as a result, quarterly reporting could instead be explored subject to the success of biannual reporting.

11.3 SUMMARY OF AMENDMENTS MADE FOLLOWING IMPACT ASSESSMENT

The Code Manager has changed the proposed legal drafting to remove references to the frequency of the Gas Annual Portfolio Reconciliation. The changes are as follows:

Iteration	Drafting
Live Version	Gas Annual Portfolio Reconciliation
Previous proposed legal drafting	Gas Biannual Portfolio Reconciliation
New proposed legal drafting	Gas Portfolio Reconciliation

This change will allow the Code Manager to make fewer changes to the wording of the REC should further changes to the frequency of the reporting be considered in the future.

12 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

12.1 RISKS AND ISSUES

NO.	RISK	NOTES	MITIGATION
R01.R0252	MAM compliance	The 40WD turnaround depends on MAMs submitting complete and valid data within 15WDs. If the enhanced Party Assurance approach does not improve compliance, the CDSP may not meet the reduced turnaround and the expected benefits will not be realised.	The novel Performance Assurance approach proposed as part of the solution will aim to reduce non-compliance in respect of data submission.

NO.	RISK	NOTES	MITIGATION
R02.R0252	Unquantified benefits	No tangible benefits have been identified, so the case for change relies on intangible benefits and the post-implementation review. There is a risk that the review concludes the solution is not cost-effective.	The post-approval review period to determine the efficacy of the proposed solution will allow the Code Manager to make a determination on whether the solution has been effective; if it has, it will be retained, if not, a new Change Proposal will be raised to remove the R0252 changes from the REC.

NO.	ISSUE	NOTES	HOW TO PROGRESS
I01.R0252	Reconciliation report content	Respondents indicate that many mismatches relate to Data Items (such as meter installation date) that MAMs cannot identify from the current report. Increasing frequency without addressing report content may limit the improvement in data quality.	The Code Manager will consider whether modifying the content of the reconciliation report in respect of the included Data Items adds value during the post-approval review.
I02.R0252	Limited MAM input	No MAMs responded to the Party impact assessment and the consultation period has been shortened, which may limit the evidence available on MAM impacts.	The Code Manager will seek to engage MAMs more directly during the consultation period.
I03.R0252	PAB Input	The proposed 33WD PAB Paper approach given in the documentation for the Performance Assurance solution may not be viable following changes to REC governance arising from Ofgem's Code Reform programme.	Code Manager to review PAB Paper requirements post-approval.

12.2 ASSUMPTIONS AND DEPENDENCIES

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A01.R0252	REC Performance Assurance will be able to implement necessary assurance approach to compel MAMs to submit data faster.		To be confirmed prior to the final vote by the REC Change Panel.
A02.R0252	CDSP will be able to make the reduced turnaround time work alongside their existing invoicing and financing activities for Parties.		No comment was provided against this assumption by the CDSP during their Impact Assessment.
A03.R0252	Doing this process twice a year is a sufficient cadence	Will there definitely be enough information generated by only doing this process twice a year? Is there scope for increasing this cadence in future should it be identified that this would help in future?	The relative effectiveness of an increase in reporting frequency cannot be determined until post go-live. The Code Manager would be open to exploring a future increase in reporting frequency beyond bi-annual should a need for this become apparent.
A04.R0252	Supplier and MEM outputs would need to follow same timescales.	Identified by CDSP in the Impact Assessment	Validated – The Code Manager proposes that the downstream application of the reconciliation report does not change.

NO.	DEPENDENCY	NOTES	STATUS
D01.R0252	The enhanced performance assurance approach will have ensured that CDSP have access to the required threshold amount of market data to meaningfully complete the reconciliation.		To be confirmed prior to the final vote by the Responsible Committee.

13 BUSINESS CASE ASSESSMENT

13.1 COSTS

COSTS	DESIGN/ DEVELOPMENT COSTS	IMPLEMENTATION COSTS	ONGOING OPERATIONAL COSTS
REC PARTIES	Nil	Nil	Nil
CDSP	Nil	Nil	£15K-£17K PA
OAM FUNCTION	Nil	Nil	£1632 PA
PARTY ASSURANCE FUNCTION	£1167	Nil	£8645 PA
TOTAL	**£1167**	**Nil**	**£25,277-£27,277 PA**

13.2 BENEFITS

13.2.1 TANGIBLE BENEFITS

No tangible benefits have been identified as respondents to the Party Impact Assessment were not able to provide them. The Code Manager has not been able to quantify the benefits that would arise from a given reduction in Data items within the scope of the reconciliation. Furthermore, the Code Manager recognises the difficulty arising from trying to identify a causal link between the reconciliation and Consumer-facing Switching & Billing issues. However, work carried out previously by the Performance Assurance function of the REC Code Manager has suggested that any activity that reduces the number of mismatches of gas Metering Data Items (i.e., as the reconciliation does) is helpful (see section 13.2.2 for further details). However, as a compromise, the Code Manager proposes a novel implementation approach where the benefits are reviewed a year after the Change Proposal is implemented in order to retroactively determine the tangible impact arising from improvements to the Reconciliation process (please see sections 9.4 and 14.1 for further details).

13.2.2 INTANGIBLE BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
REC CENTRAL SYSTEM EFFICIENCIES	Increasing the frequency of the Portfolio Reconciliation, alongside a reduced turnaround time, is expected to support improvements in the efficiency of central assurance and reconciliation activities. More timely and regular reconciliation outputs should reduce the accumulation of unresolved discrepancies, enabling REC Performance Assurance and the CDSP to address issues closer to the point at which they arise. Over time, this may reduce the need for reactive or escalatory assurance activity and support a more stable and predictable operational process.
IMPROVED GAS DATA QUALITY	More frequent reconciliation of MAM-held Data Items, combined with faster feedback on discrepancies, is expected to support improvements in the overall quality and accuracy of gas metering data held centrally. Earlier identification of inconsistencies should enable MAMs to correct data closer to source, reducing the risk of prolonged data misalignment. Improved data quality is expected to support downstream market processes that rely on accurate metering information and contribute to improved confidence in central gas data sets.

13.3 COST BENEFIT ANALYSIS

The proposed solution has an associated ongoing cost to the CDSP arising from the increased frequency of the Portfolio Reconciliation exercise, with no upfront build or implementation costs identified. There is a design and build cost, as well as an ongoing cost, arising from the Performance Assurance solution. No direct costs have been identified for REC Parties, although MAMs will need to provide the required reporting twice as often, subject to an enhanced Assurance approach to ensure timely submission of data. While respondents to the Party Impact Assessment were unable to quantify financial benefits, the solution is expected to support improved operational efficiency and data quality across the central gas market arrangements.

These benefits, while largely intangible, are expected to accrue over time through more timely identification and resolution of data discrepancies, reducing the accumulation of issues and supporting a more efficient assurance regime. Improved data quality is expected to support downstream market processes and contribute to greater confidence in central data sets. Furthermore, the Code Manager plans to determine the quantifiable benefit arising from the proposed solution, should it implemented, after a year, to ratify these assumptions. On these bases, the Code Manager considers that the anticipated benefits are proportionate to the identified costs, and that the proposed solution represents a balanced and cost-effective approach to addressing the problem statement.

14 CASE FOR CHANGE

14.1 SELF GOVERNANCE

The Code Manager considers that there is a case for change to implement this solution, on the basis that it:

- Is both viable and implementable, and it appropriately resolves the problem statement; and
- Is cost effective and proportionate to the anticipated benefit.

The Code Manager proposes to review these assumptions in 2028, in line with the post-implementation review set out in section 9.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link

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16 GLOSSARY

TERM	DEFINITION
Central Data Service Provider	means the 'Central Data Service Provider' appointed by Gas Transporters pursuant to standard special condition A15 (Central Data Service Provider) of the Gas Transporter Licences.
Data Item	means the most granular level of data defining a specific attribute in respect of a data type, the permissible values for which are defined and controlled in the Data Item Catalogue.
Meter Asset Manager	means a Party which has Qualified in that role under the Qualification and Maintenance Schedule. Where used in respect of a particular Supply Meter Point, it means the MAM Appointed by a Gas Supplier in accordance with the Metering Operations Schedule. The MAM is accountable for the installation, replacement, repair and maintenance of gas Metering Equipment (either itself or by an AMI), and the MAM must also therefore be Accredited under the Metering Accreditation Schedule.
Performance Assurance	means the activities undertaken by the Code Manager and the REC PAB in accordance with the Performance Assurance Schedule.