RETAIL ENERGY CODE

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01	Proposal Plan
02	Consultation
03	**Final Recommendation**

CHANGE REPORT

R0271 – CLARIFICATION OF ASP, AMI, AND EMO ACCESSION REQUIREMENTS

DOCUMENT VERSION	1.0
PROPOSED IMPLEMENTATION DATE	27 February 2026
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Metering Expert Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	Medium	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	EMOs, AMIs		

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

Schedule 15 - Metering Accreditation is explicit that Meter Operator Agents (MOAs) and Meter Asset Managers (MAMs) need to accede to the Retail Energy Code (REC), but is not explicit on whether Automated Meter Reading (AMR) Service Providers (ASPs), Approved Meter Installers (AMIs), and Electricity Metering Operatives (EMOs) need to accede to the Code.

RESPONSIBLE COMMITTEE DECISION

On 12 November 2025, the Metering Expert Panel voted in line with the Code Manager recommendation to:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 27 February 2026.

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BACKGROUND

1 SUMMARY

The Consolidated Metering Code of Practice (CoMCoP) is written with the assumption that all CoMCoP signatories are REC Parties. Schedule 15 – Metering Accreditation is explicit that MOAs and MAMs need to accede to the Code, but is not explicit on whether ASPs, AMIs and EMOs need to accede to the Code. The REC Main Body outlines that AMIs and EMOs can accede to the Code, but does not reference ASPs.

REC Schedule 1 – Interpretations and Definitions defines AMI as "means a Party which is *approved*…" and defines EMO as "means a Party which is *approved*…". This confirms that AMIs and EMOs are required to accede to the Code as a Party. Schedule 1 includes two definitions of ASPs, as "means a person or persons that are *approved*…" – both of which indicate the intention of the Code is that ASPs are not required to be a Party. This is supported by the fact that ASPs are not mentioned in the Main Body and have a voluntary role in CoMCoP.

REC Schedules 1 – Interpretations and Definitions and 15 – Metering Accreditation should be updated to explicitly confirm whether ASPs, AMIs, and EMOs are required to accede to the Code. Schedule 1 should also be amended to remove the two definitions of ASPs and provide one definition that clarifies their voluntary status in CoMCoP in accordance with Schedule 15.

2 PROBLEM STATEMENT

There is a lack of clarity in the Code as to whether ASPs, AMIs, and EMOs need to accede to the REC, meaning these companies may not sure be of their REC obligations.

3 IMPACTS

REC PARTIES AND SERVICE USERS
EMOs
AMIs

REC DOCUMENTS / PRODUCTS
Schedule 1 – Interpretations and Definitions
Schedule 15 – Metering Accreditation

MHHS
This Change Proposal has no impacts on MHHS.

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4 CROSS-CODE IMPACTS

There are no cross-code impacts identified with this Change Proposal.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**31 Jul-25**	**19 Sept-25**
	Code Manager Initial Assessment	July	August
	Solution Development	July	September
	Legal Review	July	September
	Business Case Assessment	September	September
Change Proposal		**20 Sept-25**	**11 Nov-25**
	Consultation	September	October
	Final Determination	October	November
Voting		**12 Nov-25**	**12 Nov-25**
	Appeal Window	13 November	27 November

The Code Manager is proposing that this Change Proposal proceeds straight to consultation as there is no impact to Parties and is only providing clarity on current accession requirements. Additionally, the REC Performance Assurance team have confirmed a review of all EMOs and AMIs in the Party Register was previously conducted to ensure they have all acceded to the Code.

6 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	1	27	27
	Retail Markets Impact	Innovation and Market Arrangements	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	7	7
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		3	9	28
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	0	10	0
				Overall Priority Score (rounded)	114

Priority Status	MEDIUM
Change Proposal Type	STANDARD

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SOLUTION

7 PROPOSED SOLUTION

The proposed solution is to amend the legal text of Schedules 1 and 15.

REC Schedule 1 – Interpretations and Definitions will be amended to remove the two different definitions of ASPs and provide a consolidated definition, maintaining the intention of the Code that ASPs are not Parties to the REC and not required to accede to the Code.

REC Schedule 15 – Metering Accreditation will also be amended to clarify accession requirements for EMOs, AMIs and ASPs. A review has been conducted by the REC legal advisors.

8 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0271 can be found here.

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PRELIMINARY ASSESSMENT

9 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

There are no risks, assumptions, issues or dependencies identified for this Change Proposal.

10 BUSINESS CASE ASSESSMENT

10.1 COSTS

There are no costs associated with this Change Proposal.

10.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
IMPROVED CLARITY FOR AMIS AND EMOS	The implementation of this Change Proposal will provide clarity to AMIs and EMOs of their accession requirements to the Code. The proposed legal text changes will explicitly state that AMIs and EMOs are required to accede to the Code as a Party.
IMPROVED CLARITY REGARDING ASPS	The implementation of this Change Proposal will provide clarity to industry that ASPs are not a Party to the REC, nor are they required to accede to the Code. However, ASPs may choose to apply for approval (and therefore may be approved) under the CoMCoP in accordance with the REC Schedule 15 – Metering Accreditation. As such, ASPs are non-Parties to the REC and only have a voluntary role in CoMCoP.

10.3 COST BENEFIT ANALYSIS

There are no central systems costs, no expected costs to Parties and two intangible benefits associated with this Change Proposal. As such, the Code Manager believes that there is a positive case for change.

11 CASE FOR CHANGE

The Code Manager considers there is a positive case for change for implementing this Change Proposal on the basis that the proposed solution:

- Is both viable and implementable, and effectively resolves the problem statement;
- Has no associated central system costs and no associated Party costs;
- Has proportionate effort required for implementation;
- Will provide improved clarity for AMIs and EMOs regarding their accession requirements to the Code; and

- Will provide improved clarity for industry regarding ASP's status as non-Parties to the REC, and that they may seek voluntary approval under CoMCoP in accordance with REC Schedule 15 – Metering Accreditation.

12 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 19 September 2025 to obtain views on the Change Report (For Consultation). As no responses were received, and following a subsequent review by the Code Manager, no amendments have been made to the Change Report, or the proposed solution, post-consultation.

Although no formal responses were received during the consultation period, the Code Manager is confident that stakeholder engagement has been sufficient to support the progression of this Change Report. As outlined in Section 5 of this Change Report, the REC Performance Assurance team have confirmed a review of all EMOs and AMIs in the Party Register was previously conducted to ensure all CoMCoP-accredited companies were all acceded to the Code. Additionally, this Change Proposal only sought to clarify existing accession requirements and did not change Party obligations.

13 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link

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14 GLOSSARY

TERM	DEFINITION
Accreditation	means the process by which each Meter Asset Manager, Meter Operator Agent, Approved Meter Installer, Electricity Metering Operative and AMR Service Provider is recognised as fulfilling the requirements of the CoMCoP which are applicable to their role, which may include an audit process in accordance with the Metering Accreditation Schedule. "Accredited" and similar expressions shall be interpreted accordingly.
Approved Meter Installer (AMI)	means a Party which is approved (or which is seeking approval) as such under the Metering Accreditation Schedule, being the entity, which undertakes the installation, replacement, repair and maintenance of gas Metering Equipment.
Automated Meter Reading Service Provider (ASP)	means a person or persons that are approved, or are seeking approval, in accordance with the Metering Accreditation Schedule to offer services relating to the provision of consumption data from a utility meter collected through an AMR system. means a business or organisation that offers provision of consumption data from a utility meter collected through an AMR system to a number of parties including Consumers, Shippers, Energy Suppliers, Gas Transporters, DNOs, energy brokers and energy management companies. NB: as part of this Change Proposal, this definition will be amended to remove the duplicate definitions and provide one consolidated definition that remains true to the intention of the Code.
Consolidated Metering Code of Practice (CoMCoP)	means the code of practice forming part of this Code against which Meter Asset Managers, Meter Operator Agents, Approved Meter Installers, Electricity Metering Operatives and AMR Service Providers are assessed pursuant to the Metering Accreditation Schedule.
Electricity Metering Operative (EMO)	means a Party which is approved (or which is seeking approval) as such under the Metering Accreditation Schedule, being an entity which undertakes the installation, replacement, repair and maintenance of electricity Metering Equipment.
Meter Asset Manager (MAM)	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.
Meter Operator Agent (MOA)	means a Party which has Qualified in that role under the Qualification and Maintenance Schedule. Where used in respect of a particular Metering Point, it means the MOA Appointed by an Electricity Supplier in accordance with the Metering Operations Schedule. The MOA is accountable for the installation, replacement, repair and maintenance of electricity Metering Equipment (either itself or by an EMO), and the MOA 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.