RETAIL ENERGY CODE

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

CHANGE REPORT

R0348 – ENERGY CODE REFORM - CONSEQUENTIAL CHANGES TO THE REC

DOCUMENT VERSION	V1.1
PROPOSED IMPLEMENTATION DATE	Code Manager Licence Commencement Date
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Change Panel	**CHANGE PATH**	Self-Governance
PRIORITISATION CATEGORY	High	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	REC Service Providers, REC Code Manager, RECCo and users of affected REC products.		

LEAD ANALYST (SOLUTION LEAD)	SUBJECT MATTER EXPERT	MARKET DESIGN LEAD
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OVERVIEW

On 04 September 2026, Ofgem published a Statutory consultation to seek views on proposed amendments to the Retail Energy Code (REC) 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.

Ofgem's statutory Code Reform process will itself introduce amendments to the REC, including amendments to a number of REC Schedules. Those amendments are outside the scope of R0348 and are not being proposed, assessed or approved through this Change Proposal.

Where a REC Schedule is being amended both by Ofgem and by R0348, the two sets of amendments will need to be read together and, on implementation, consolidated to form the complete revised Schedule.

R0348 therefore makes the additional consequential amendments needed across the wider REC baseline so that the REC operates consistently when the new governance arrangements take effect. As part of the review of the affected REC baseline, a small number of minor housekeeping amendments to existing REC Schedules have also been identified. These amendments do not arise from Energy Code Reform and are not required as a consequence of Ofgem's proposed changes. However, it is considered appropriate and proportionate to progress these minor corrections through R0348.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date, being the date on which RECCo is awarded a Code Manager licence (i.e., the Code Manager Licence Commencement Date).

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BACKGROUND

1 SUMMARY

Under new powers created by the Energy Act 2023, Ofgem are responsible for selecting and licensing Code Managers. Licensed Code Managers will undertake responsibilities under the new statutory governance framework, including responsibilities relating to the development and modification of their respective codes and delivery against Ofgem's Strategic Direction Statement.

RECCo is currently undergoing the selection process to become the Code Manager for the REC and is progressing through the arrangements required for the REC to transition to the new Licensed Code Manager governance framework. On 04 September 2026, Ofgem published a Statutory consultation to seek views on proposed amendments to the REC 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 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.

The review has also identified a small number of minor housekeeping changes to existing REC Schedules. These Schedule amendments are not consequential to Energy Code Reform and are not required to implement Ofgem's proposed changes. They address existing drafting, cross-reference and other minor issues within the current baseline. As these documents have already been reviewed as part of this exercise, R0348 provides an appropriate opportunity to make those amendments alongside the Code Reform changes.

The principal amendments required to establish the new governance framework are being progressed separately by Ofgem through its statutory process. This includes changes to the REC Main Body and changes to a number of REC Schedules. Those Ofgem-directed amendments are outside the scope of R0348 and do not form part of the legal text being assessed under this Change Proposal.

This proposal therefore seeks to progress the additional consequential changes required through the REC Change process. The purpose of R0348 is to ensure that, when the new governance arrangements take effect, the wider REC baseline does not retain outdated terminology, responsibilities, governance bodies or processes that are inconsistent with the reformed REC. The proposal is not intended to revisit or amend the substantive Code Reform policy decisions being implemented by Ofgem.

For some REC Schedules, both Ofgem and R0348 propose amendments to the same document. The R0348 legal text has been prepared against the current REC baseline and therefore shows only the amendments proposed through R0348. It should be read alongside the corresponding legal text published by Ofgem as part of its statutory consultation. Subject to

the outcome of the respective processes, the Ofgem-directed amendments and the amendments approved through R0348 will be consolidated to produce the complete post-Code-Reform version of the affected Schedule.

2 PROBLEM STATEMENT

Without corresponding consequential amendments, parts of the REC baseline could retain references, responsibilities, governance arrangements or processes that are inconsistent with reformed REC arrangements.

This could create ambiguity over which governance arrangements apply, where responsibilities sit and which process should be followed. It would also mean that different REC products could describe the same arrangements inconsistently.

3 IMPACTS

REC SERVICE PROVIDERS
Indirect impact to all REC Service Providers

RECCO / REC CODE MANAGER
REC Code Manager
RECCo

REC DOCUMENTS / PRODUCTS
Schedule 7 - Energy Theft Reduction
Schedule 8 - Unbilled Energy Code of Practice
Schedule 9 - Qualification and Maintenance
Schedule 15 - Metering Accreditation
Schedule 19 - Market Exit and Supplier of Last Resort
Electricity Enquiry Service Definition
Central Data Service Provider Further Services Definition
Secure Data Exchange Service Definition
Green Deal Central Charging Database Service Definition
Gas Enquiry Service Definition
Electricity Retail Data Service Definition
Gas Retail Data Service Definition

Switching Operator Service Definition
Central Switching Service Definition
CSS Certificate Authority Service Definition
Consolidated Metering Code of Practice (CoMCoP)
Change Panel Terms of Reference (removal)
Performance Assurance Board Terms of Reference
Performance Assurance Report Catalogue

MHHS
There are no impacts to MHHS.

4 CROSS-CODE IMPACTS

The Balancing and Settlement Code (BSC) is also included in phase one of Code Reform and will be undergoing its own transition to the new governance arrangements. This Change Proposal has no impact or dependency on the BSC or other codes.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Change Proposal		**28 Sep 26**	**16 Nov 26**
	Consultation	October	October
	Solution Refinement	October	November
	Final Determination	November	November
Voting		**17 Nov 26**	**17 Nov 26**
	Appeal Window	18 November	01 December

The timetable is intended to allow the consequential amendments to be approved and ready to take effect alongside the wider Energy Code Reform changes to the REC. The timetable will be kept under review against Ofgem's confirmed implementation arrangements.

6 PRIORITISATION CATEGORY AND URGENCY

6.1 PROPOSER REVIEW

The Proposer of this Change Proposal has provided a review stating this Change Proposal:

- Does not meet the criteria for Urgency;

- The proposal directly supports Section 11.2 of the Strategic Direction Statement: Reform energy code governance to enable faster, more strategically aligned rule changes across the sector which includes:
    - Implement Ofgem's new strategic functions and transition to Code Manager arrangements – phase 1; and
    - Simplification of the codes.
- Delivers a significant regulatory and governance benefit by ensuring that the wider REC baseline is capable of operating consistently with the new governance framework from implementation, this delivers noticeably greater regulatory benefit than most other Standard changes; and
- Is expected to have low implementation complexity because the changes are principally amendments to REC documentation and governance products and are not expected to require participant system changes. The proposal is broad in scope because a number of REC products require consequential amendment to support Code Reform and a small number of additional Schedule housekeeping amendments are being progressed at the same time.

6.2 CODE MANAGER REVIEW

The Code Manager agrees with the proposer's assessment and is proposing this Change Proposal be given an Urgency Status of Standard and a Prioritisation Category of High.

The Code Manager considers a priority of High to be appropriate because the changes are required to support the effective implementation of Energy Code Reform and need to be in place when the new REC governance arrangements take effect.

SOLUTION

7 PROPOSED SOLUTION

All REC documents categorised in the Baseline Statement have been reviewed and updated accordingly, to reflect the new arrangements being introduced as part of Energy Code Reform.

This Change Proposal contains two distinct types of amendment:

1. Code Reform consequential amendments - changes required to align affected REC products with the new Code Manager governance arrangements, modification process and associated governance changes being implemented by Ofgem; and
2. Housekeeping amendments - limited to minor drafting, cross-reference, terminology and similar corrections to existing REC Schedules.

The Code Reform consequential amendments are intended to ensure that affected 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.

These changes are consequential to, or being progressed alongside, the implementation of Code Reform and do not seek to alter the substantive policy decisions made by Ofgem. The minor housekeeping changes identified through the review do not change existing obligations or policy.

8 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0348 can be found here.

The R0348 legal text shows only the amendments proposed through this Change Proposal. It does not reproduce the amendments to the REC being progressed separately by Ofgem through its statutory Code Reform process.

Where R0348 and Ofgem both amend the same REC Schedule, the R0348 drafting has been redlined against the current REC baseline. Reviewers should therefore read the R0348 legal text alongside the corresponding legal text published by Ofgem as part of its statutory consultation in order to understand the complete set of changes to that Schedule.

Subject to the outcome of the respective processes, the Ofgem-directed amendments and the amendments approved through R0348 will be consolidated before implementation to create the complete revised version of each affected REC document.

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PRELIMINARY ASSESSMENT

9 BUSINESS CASE ASSESSMENT

9.1 COSTS

There are no costs to implement this Change Proposal, as it is an update to legal text only.

9.2 BENEFITS

This Change Proposal will facilitate the realisation of the benefits of Energy Code Reform as set out by Ofgem. These are to facilitate the transition to net zero and ensure that the codes evolve in the best interests of Consumers by

- making it easier for Market Participants to engage with the codes;
- facilitating the delivery of strategic change within the codes; and
- supporting the implementation of the new code governance arrangements.

More specifically, this Change Proposal will:

- provide a coherent REC baseline when the new governance framework takes effect;
- remove obsolete governance references, reduce ambiguity about decision-making responsibilities and resolve minor drafting errors;
- ensure consistent use of the new modification procedures terminology and processes across affected REC products;
- make clear where responsibilities sit with RECCo and where they sit with the Licensed Code Manager;
- support the transition from the existing Change Panel and expert panel arrangements to the new governance model, including the SAF; and
- reduce the risk of users relying on outdated or inconsistent REC provisions after implementation.

10 CASE FOR CHANGE

SELF GOVERNANCE

The Code Manager believes there is a positive case for change, as:

- the proposed solution appropriately resolves the original Problem Statement;
- the cost and effort of implementing and operating the proposed solution is proportionate and cost-effective; and
- has a strong alignment with Ofgem's Strategic Direction Statement to reform Energy Code governance to enable faster, more strategically aligned changes across the sector.

11 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 09 October 2026 to obtain views on the Change Report (For Consultation). In total five responses were received from two Distribution Network Operator's (DNO), one Energy Supplier, one Gas Transporter and the Data Communications Company (DCC). The key themes from these responses have been summarised and set out below. The non-confidential responses have been published here.

11.1 SUMMARY OF RESPONSES

The consultation responses show overall support for R0348, with four of the five respondents supporting the proposed amendments or raising no concerns. The only substantive issue raised related to the proposed use of the terms "RECCo" and "REC Board", where one respondent considered that "Code Manager" and "Code Manager Board" should be used instead. No respondents identified any material operational, technical or contractual impacts arising from the proposal. There was also agreement that the proposed housekeeping amendments are appropriate and non-substantive.

11.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

Four respondents either agreed that the amendments accurately reflect the consequential changes required by Energy Code Reform or identified no issues with the proposal. Smart DCC disagreed with replacing the terms "Code Manager" and "REC Board" with "RECCo" and "RECCo Board", and they consider that role-based terminology would provide greater clarity, consistency across energy codes, alignment with the Code Manager licence and futureproofing should a different Code Manager be appointed.

In response, the Code Manager noted that the terms "RECCo" and "RECCo Board" are taken from the legal text proposed by Ofgem in its Energy Code Reform statutory consultation on modifications to the REC and affected licences, published on 04 September 2026, and that the choice of terminology is therefore outside the scope of R0348. R0348 makes only the consequential amendments and uses the same terminology as Ofgem's proposed legal text so that the REC reads consistently once both sets of changes are implemented. Should Ofgem's final legal text use different terminology, this will be reflected in any later consequential changes to the REC. No change has been made to the R0348 legal text in response to this comment.

One respondent requested confirmation that drafting from R0348 and Ofgem's statutory consultations on modifications to the Retail Energy Code and affected licences, will be reconciled before implementation to prevent any omission, duplication or conflict.

The Code Manager confirmed that the R0348 drafting and the amendments arising from Ofgem's statutory consultation will be reconciled before implementation. Where a REC Schedule is amended both by Ofgem and by R0348, the two sets of amendments will be read together and consolidated to form the complete revised Schedule.

11.3 IMPACTS

No respondent identified any material operational, technical or contractual impacts arising from the proposal.

One respondent sought confirmation that R0348 does not alter the existing distinction between Central Data Service Provider (CDSP) functions undertaken under the Uniform Network Code (UNC) and services provided for REC purposes. The Code Manager confirmed that R0348 makes no change to this boundary.

11.4 ADDITONAL HOUSEKEEPING AMENDMENTS

Respondents were broadly supportive of the housekeeping amendments and agreed that they are appropriate and do not introduce substantive changes. DCC did not specifically comment on the housekeeping amendments but referred back to its concerns regarding governance terminology.

12 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

Following consultation, one amendment has been made to the R0348 legal text, as set out below. This amendment was identified by RECCo during solution finalisation rather than in response to a consultation comment. It clarifies the drafting, does not change the intent of the proposed solution and places no new obligations on REC Parties; further consultation is therefore not considered necessary.

DOCUMENT	SECTION	AMENDMENT	REASON
Performance Assurance Report Catalogue (PARC)	Other Data Collection and 30-39 tabs	~~Code Manager~~ RECCo service providers	to reference RECCo service providers for provision of Code Manager reporting.

13 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link

14 GLOSSARY

TERM	DEFINITION
Office of Gas and Electricity Markets (Ofgem)	Ofgem is the regulator for Britain's gas and electricity industries, overseen by the Gas and Electricity Markets Authority (the Authority)
Code Manager	means the person described in Clause 7 of the main body of this Code.
Balancing and Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.