




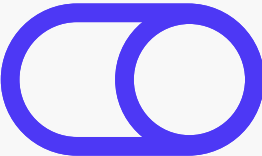
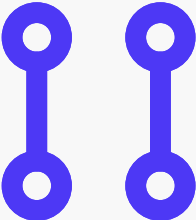



Strategy & **Forward Work Plan**

2023 - 26



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CEO Foreword



Sid Cox
Chief Executive Officer



Our mission at RECCo is to facilitate the efficient and effective running of the retail energy market, including its systems and processes, through promoting innovation, competition and delivering positive consumer outcomes. I am pleased to introduce our Forward Work Plan (FWP) for 2023-26, which follows and builds upon the strategic foundations and plans we set out in detail and delivered last year.

We have continued to provide, improve and evolve our fundamental services to all our stakeholders against a challenging and changing market environment: increases in gas and electricity prices, the existential crisis of many energy suppliers; an unprecedented level of government intervention in the retail energy market to address the cost of living crisis exacerbated by the war in Ukraine, and the refocussing of our regulator’s attention on the financial resilience and compliance of energy supply companies.

Against this context, it is easy to forget that RECCo has been delivering on a programme of planned change which started just over a year ago with the go-live of Code Manager operations and the effective delivery of Retail Code Consolidation. This included a single set of dual-

fuel arrangements in the Retail Energy Code (REC) version 2.0. During the year, we have expanded the functionality and usability of the underlying Code Manager services. Our second significant milestone was achieved in July 2022 with our contribution to the go-live of the Central Switching Service (CSS) which is now under the governance of RECCo following the full implementation of REC version 3.0. To reach this milestone, as well as making all the necessary changes to the REC and its governance, our role was to evolve the Energy Enquiry Service and to negotiate and onboard the Gas Enquiry Service. From 1 April 2023, the funding of the CSS will transfer from the Smart Energy Code to the REC, representing the single biggest change to our operating budget.

Simultaneously, we have continued to deliver on planned as well as new projects which have responded to emergent issues. In March 2022, Ofgem tasked us with delivering the systems, processes and contracts required to administer the Market Stabilisation Charge which we successfully delivered in three months, demonstrating RECCo’s ability and goal to deliver mandated change at pace. We have made significant progress with the agreed Consolidation of the Metering Codes of Practice which is on track for completion with the

introduction of a new auditing regime from April 2023. Similarly, we identified, planned and are progressing the significant consequential impacts and changes to the REC, systems, and processes to deliver the requirements to meet the Market Half-Hourly Settlement Programme. We are pleased to have now published the Theft Estimation Methodology report which gives a combined estimated range of £800m - £1,400m for gas and electricity theft, which was delayed whilst we overcame the challenges of data accessibility and availability. It is now incumbent on us to address the challenge of theft.

All of these projects have underscored the importance of data and the need for RECCo to develop and implement our digitalisation and data strategy. This strategy aims to facilitate data and improvements to our services in the short term and enable secure and open data in the long term. Open data will facilitate the provision of new products and services which will permit all energy consumers and industry to achieve the common aims of affordability, security of supply and sustainability.

During the last year, in addition to delivering key change projects and improving our core services,

CEO Foreword

we have also been establishing our enduring team. I believe we have demonstrated the capability of our young organisation to grow, adapt and deliver with the vibrancy and enthusiasm of a start-up. We benefit from experience and have a remarkable breadth and depth of knowledge for what remains a comparably small team. That said, we plan to further strengthen our team in the coming year. In essence, the role of the RECCo team is to act as an “intelligent customer” procuring and delivering value-for-money by harnessing the skills and expertise of a group of service providers, some of which we inherited as part of the code consolidation and some we appointed following competitive procurement, delivering a code model that is greater than the sum of its parts. I believe we will have an important role in supporting Ofgem and all stakeholders in facilitating the evolution to a more sustainable retail energy market that works for industry

participants and to the benefit of consumers as we transition to a Net Zero energy system.

As I mentioned at the outset, this Forward Work Plan is a continuation of the strategy and plans we put in place last year and delivers in part some of the projects which we were required to defer last year. During the coming year, we will continue to embed the governance and operation of the Central Switching Services, the Market Stabilisation Charge and Consolidated Metering Services. Our primary focus will be the stability, improvement, and evolution of our core services to ensure that they remain relevant for all stakeholders. We are collaborating with the Code Manager to establish several key areas or themes for development, which will be prioritised based on the impact they will have on consumer segments or personas that we have developed for that purpose. These themes focus on processes that are already

governed within the REC and can be improved upon through service provider contracts. Where the change would impact upon REC provisions and/or REC Parties it will be subject to the outcome of a REC Change Proposal. The long-term scheduling for the agile delivery of these improvements will be set out in the Code Roadmap published on the [REC Portal](#).

As well as these improvements to our core service, we will deliver our now significant commitment to the Market Half-Hourly Settlement (MHHS) Programme. Having established the extent of energy theft, it is our intention to work with industry parties and wider stakeholders to deliver a truly holistic Theft Reduction Strategy which addresses the problem and saves lives.

This Forward Work Plan includes a vital review of data sources, to securely open up data for purposes which will benefit the consumer, whilst also giving them control and choice. Today’s data landscape is too complicated for the next wave of innovations around time of use tariffs, energy home automation and encouraging the prosumer. Our data and digitalisation workstream will help facilitate carbon reduction strategies and get the right support to the people who need it most.

At RECCo, we know that through talking, listening, and engaging with stakeholders, we’ll be able to focus on the most effective and time-critical market improvements; ones that will benefit the energy industry, consumers, and the environment. We look forward to receiving your comments on this Forward Work Plan for 2023-26 and to working with you to deliver it.



Who Are We?

Managing the Code

We are the Retail Energy Code Company - an independent, not-for-profit that owns and manages the Retail Energy Code (REC). The REC was introduced in 2019 to simplify and consolidate multiple retail energy governance arrangements into a single code.

All licensed suppliers in the retail energy sector must follow the REC when supplying to consumers. This includes energy suppliers, gas transporters, electricity distribution network operators, metering operators and the Data Communication Company (DCC).

Building a better energy market

Through the code, the services we manage and the programmes we run, we're dedicated to building a more effective and efficient energy market for the future.



**We are an
*independent,
not-for-profit*
organisation
responsible for the
Retail Energy Code
(REC)**

What Do We Do?

A commercial approach to delivering value for money for REC Parties

We function as an intelligent customer on behalf of the energy industry. This means we apply the following commercial principles across our procurement, transformation, and operational activities and the contracts we manage:

- Procure services through open market competition wherever possible.
- Procure services that are value for money, scalable and adaptable.
- Procure services using data driven decisions.
- Always seek to deliver operational and cost efficiencies.
- Always hold our service providers accountable for their service delivery obligations.

The industry funds us, and we manage and invest those funds prudently. Therefore, we only procure to deliver current or future REC Service requirements. We will always strike a balance between innovation and ensuring the industry gets a return on its investment.

Reducing costs for REC parties by incentivising our service and contract management

We include service performance regimes in our service provider contracts. These cover the end-to-end service term, including mobilisation and operational delivery. We ensure that the regime includes quantitative and qualitative measures, is not punitive, reflects a fair balance of risk and reward and incentivises service providers to deliver in a timely manner and the quality standard required.

We agree on our service performance regimes before contracts are signed and they are monitored through the service lifecycle to ensure they are appropriate to the service and continue to be fit for purpose. This means that if providers don't meet key performance targets or miss key mobilisation milestones, they pay service credits. Service providers are incentivised to quickly remedy the cause of service failures and ensure they do not repeat.



Through its proactive service and contract management, RECCo has recovered more than £900k in service credits and delay payments from its service providers. These monies are deducted from the service cost, thereby reducing the monetary impact on REC Parties.

We will continue to innovate and adapt our service management, while at all times ensuring that service providers deliver on their commitments.

Elizabeth Lawlor
Director of Operations



Services

How we operate and deliver our services

We manage multiple service providers that deliver our core services on behalf of industry. This includes the REC Code Manager, which delivers the day-to-day operational elements of the REC.

These core services are key to the operation of retail energy market. Our overarching objective is to ensure that we successfully manage and deliver these services on behalf of industry participants.



The REC Code Manager

The REC Code Manager is responsible for delivering the day-to-day functions of the Retail Energy Code. The Code Manager is broadly split into three parts: REC Professional Services, REC Performance Assurance and REC Technical Services.

REC Professional Services

Responsible for the REC Portal and REC Change Management process. They provide support to REC parties via the service desk and through Operational Account Managers. They also offer each REC Party expert training, knowledge, and event invitations.

REC Performance Assurance

Lead on the delivery of the REC Performance Assurance Framework. They run the Performance Assurance Board (PAB) and manage Parties' entry and exit to the REC.

REC Technical Services

Act as the technical design authority and maintain REC technical documentation through the Energy Market Architecture Repository (EMAR) and by providing technical support.

Services

The key services that RECCo procure, manage and deliver on behalf of the retail energy market.

CSS

EES

GES

GDCC

ETTOS

MSC



Central Switching Service (CSS)

The Central Switching Service (CSS) was launched in July 2022 as part of new, faster switching arrangements. The CSS includes a registration service and an address management service.



Electricity Enquiry Service (EES)

The Electricity Enquiry Service (EES) is in place to assist suppliers with the consumer switching process. It also benefits REC and non-REC parties, such as Price Comparison Websites (PCWs) and other Third-Party Intermediaries (TPI) that offer consumers energy related services.



Gas Enquiry Service (GES)

The Gas Enquiry Service (GES), formerly known as the Data Enquiry Service, is used by market participants to examine data relating to Registerable Measurement Points (supply meter points). GES is now governed under the Retail Energy Code and is available through Xoserve's Service Portal.



Green Deal Central Charge Database (GDCC)

The Green Deal was a government-run energy efficiency scheme. RECCo manages the ongoing systems and data for this legacy service. The GDCC facilitates GB Green Deal plans by providing a point of reference and interaction between relevant Green Deal Users.



The Energy Theft Tip-off Service (ETTOS)

The Energy Theft Tip-off Service is operated by Crimestoppers. It allows members of the public to anonymously report suspected theft of gas and electricity.



The Market Stabilisation Charge (MSC)

RECCo administer the MSC, a charge introduced by Ofgem in April 2022, which is triggered when wholesale prices fall 10% below the levels assumed in the Default Tariff Cap calculations. When in effect, the Market Stabilisation Charge is levied upon suppliers that gain new domestic customers.



Strategic Approach

RECCo is a not-for-profit that ensures the proper, effective and efficient management of the Retail Energy Code. Our purpose and vision are set out in our mission statement. We deliver this primarily through the design, procurement and management of services to market participants.

In preparing this strategy, we have reviewed our mission statement, strategic aims and deliverables. It builds on the commitments we made in the 2022-2025 Forward Work Plan, where many of the deliverables and initiatives remain aligned to our core ambitions and span multiple years. We have also taken on board the feedback we received from our stakeholders during the course of the year.

We remain focused on our core deliverables, seeking to drive better services under the retail energy market, introducing efficiencies, to enable a retail regulatory environment which supports innovation and change to bring positive effects for consumers, and helps the UK transition to Net-Zero. Our work should continue to support these ambitions. However, the current cost of living crisis has sharpened our focus on what can be achieved in the near-term, to benefit consumers, through reducing complexity and cost. Making a difference to consumer journeys in the retail energy market will be a key theme in our strategy.



The 5c's

Together, our mission statement, strategic aims, values and principles promote the outcomes we seek to achieve. We call these the 5c's. They ensure our workstreams encompass and remain true to our strategy.



Mission Statement

We will facilitate the efficient and effective running of the retail energy market, including its systems and processes. We'll do this through promoting innovation, competition and delivering positive customer outcomes

Outcomes Promoted

Consumers

Working towards the ultimate aim of delivering consumer benefits

Climate

Supporting the decarbonisation of the energy industry and contribution to the UK's overall Net-Zero transition

Competition

Proactively identifying efficiencies and innovations that will support competition

Cost

Ensuring our services are efficient and cost-effective

Catalyse Improvement

The steps we take promote change, efficiencies and innovation that contribute to the energy industry move to decarbonisation and deliver consumer benefits

RECCo Capabilities



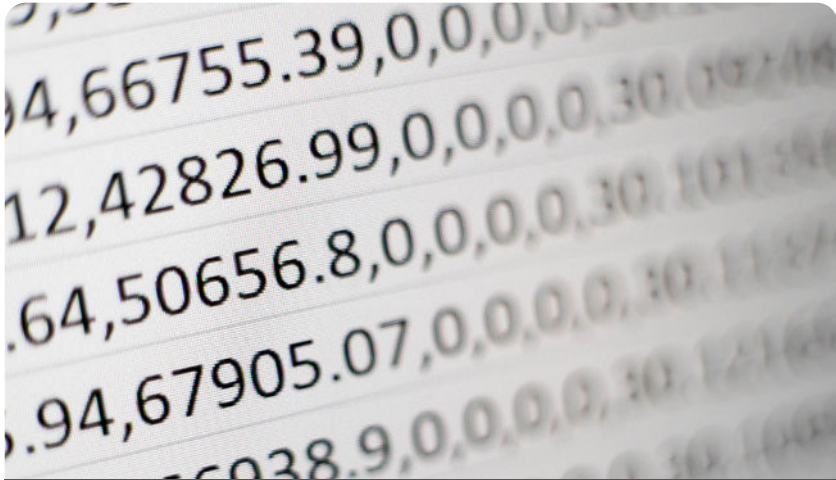
Service excellence

We are committed to providing a best in class governance model, over both the REC itself and the services that we are entrusted with. We will continue to provide transparent and measurable value for money, embrace learnings and adapt according to the evolving needs of REC Parties, stakeholders and consumers.



People

We are committed to having an expert and highly motivated team that will deliver the RECCo vision. We will continue to build the capabilities of our people, fostering a culture of learning, collaboration and innovation, maintaining a safe space to try new things and if necessary ‘fail fast’ in pursuit of better outcomes for REC Parties, stakeholders and consumers.



Data and Digitalisation

We will continue to embrace digital by design principle, leveraging our technologies and data to simplify and improve retail energy market procedures, and where possible create new channels for communication, while ensuring that no consumer is left behind.



Procurement and financial management

We will demonstrably deliver value for money through the competitive procurement of REC Services and ensure we have the capabilities to act as an intelligent consumer on behalf of REC Parties in subsequent supplier relationship management.



Stakeholder engagement

We will earn and maintain the trust of REC Parties and stakeholders by being open, honest, independent and informed. We will work proactively with all stakeholders to identify solutions and make improvements that contribute to a better functioning retail energy market and facilitate our wider strategic objectives in the interests of REC Parties and consumers.

Achievements

Last year we set out an ambitious work plan, being a combination of continuing long-term projects and new activity, while striving for excellence in our day to day operations.

Workstream	Deliverable	Assessment
REC v3	Produce the drafting for REC v3.0 to introduce governance of the CSS	<ul style="list-style-type: none">• REC v3 implemented on time• Managed the governance development, baselining and testing
Central Switching Service	Go-live with new switching arrangements	<ul style="list-style-type: none">• CSS Go-live was successfully achieved in July 2022• Established the process for sending Switching Domain Data to the CSS• Updated the market entry assessment and qualification and market exit process to reflect the new switching arrangements• Updated the REC change process• Updated the REC Performance Assurance Framework• Worked closely with DCC and other service providers to agree and test new REC processes• Exited switching early life on time and managed transition to enduring governance• Developed CSS performance management regime ready for implementation on 01 April 2023
Electricity and Gas Enquiry Services	Onboard EES and GES	<ul style="list-style-type: none">• Designed, built and tested new interface to exchange messages with CSS• Changed EES website and API's to accommodate all new CSS functionality and data items• Negotiated GES service provision and successfully onboarded service
Market Stabilisation Charge	Ofgem obligation for RECCo to operate the MSC	<ul style="list-style-type: none">• Introduced vires for RECCo to operate the scheme• Developed governance and processes to support the MSC administration• Designed, developed, tested and implemented technical solution under the REC• Successful collection and distribution of first billing cycle
Metering consolidation and assurance	Consolidate and simplify metering codes	<ul style="list-style-type: none">• Consolidation of four Metering Codes of Practice will be in place by the end of the financial year in line with the target date• Awarded new Auditor contract
Energy Theft Tip Off Service	Improve consumer awareness of the Tip Off scheme and the risks associated with energy theft	<ul style="list-style-type: none">• Delivered Awareness Campaign – across different social media platforms such as TikTok, radio campaigns, Google ads and out of home campaign

Achievements

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Workstream	Deliverable	Assessment
Energy Theft Detection Incentive Scheme	Review and improve incentive scheme	<ul style="list-style-type: none">• Better targeted incentives introduced for 2022/23 scheme year• Effective credit control processes ensured timely reconciliation of 2021/22 scheme year• Change Proposal raised to make further improvements to future scheme years in line with feedback from stakeholder survey and Theft workshop
Theft Reduction Strategy	Develop vision, strategy and robust business case for the theft reduction services	<ul style="list-style-type: none">• Produced robust Theft Estimation Methodology;• Delivered industry workshop identifying current impediments to more effective theft prevention and solutions to them• Consulting on initiatives to be taken forward as part of the Theft Reduction Strategy
Digital Navigator	Improve and enhance REC Data Specifications	<ul style="list-style-type: none">• Improved engagement and navigation of the digital REC in EMAR• Progressing the inclusion of REC Party licences to facilitate read across of obligations
Performance Assurance Reporting Catalogue	Update and review	<ul style="list-style-type: none">• Changes to the catalogue were made to accommodate the introduction of the CSS, and improve the clarity and efficiency of the data collection process
Service Management	Continuous development and supporting parties	<ul style="list-style-type: none">• Managed close out of Code Manager Post Implementation Plans (PIP) to resolve outstanding deliverables including operational processes, documentation, and system issues.• Worked with the Code Manger to ensure all the PIP requirements were completed to the required quality standards and that solutions that will support Parties in engaging with the service and understanding their obligations under the Code were implemented at no additional cost
Financial and Commercial Management	Established and implemented robust financial and commercial processes to ensure efficient use of industry money	<ul style="list-style-type: none">• Developed refined financial reporting processes to minimise bad debts and risk• Developed and implemented robust procurement principles and processes• Received a clean statutory audit
Consumer Initiatives	Supported Government Initiatives to support Consumers with energy costs	<ul style="list-style-type: none">• Provision of data reports to support BEIS in the delivery of the Energy Bills Support Scheme

Stakeholder Engagement

Stakeholder feedback is critical to us. It means that we can listen to and resolve concerns, and work to make improvements. By working agilely with our service providers, in the past year we have been able to identify areas for improvement, such as the portal’s user experience. We’ve also implemented change that allowed REC Parties and other REC users to access an improved product.

In November 2022, we conducted our first stakeholder survey. This is part of our ongoing commitment to engaging widely with our stakeholder community to ensure that RECCo is meeting or exceeding expectations. Our survey asked detailed questions to enable us to effectively benchmark and performance assess several of our key service providers, the results of which will enable us to continually improve how REC services are run. We expect the results to be available shortly, and they will be disseminated amongst all REC parties and other interested stakeholders. We anticipate that next year we will broaden the scope of our annual stakeholder survey to encompass a wider range of REC services.

As noted in the ‘next steps’ section, we will host a stakeholder webinar to discuss the content of this Forward Work Plan. We will also work closely with Parties’ Operational Account Managers to ensure that we are familiar with their own strategies and emerging needs, and using those industry insights to facilitate a more agile approach to the development of our future work plans.



Priority Work for 2023/24

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Consumers	Climate	Competition	Cost	Catalyse	Project	Outcomes	2023/24	2024/25	2025/26
✓		✓		✓	Data and Digitalisation	Consult upon and implement results of applying open data principles to REC controlled data	✓		
						Facilitate development of a consumer consent mechanism	✓		
						Work with Code Manager and stakeholders to produce a strategy to completeness and quality of market data impacting upon retail risks	✓		
						Publish approach to evolution of REC Digital services and integration into Code Roadmap	✓		
						Subject to BEIS decision, facilitate implementation of Secure Smart Energy System		✓	
						Consult upon proposal for API Gateway and Microservices Architecture	✓		
✓			✓	✓	Theft Reduction Strategy	Re-establish theft expert group and stakeholder forum	✓		
						Raise industry and stakeholder awareness of theft issue	✓		
						Incentives: map relevant industry processes, identity issues which contribute to losses, and options to resolve them	✓		
						Incentives: implement a more holistic and effective Theft Detection Incentive Scheme		✓	
						Data: identify existing sources of theft related data and facilitate better data sharing	✓		
						Data: identify and obtain new sources of theft related data and/or analytics		✓	
						Engage with and identify better ways of working with non-industry agencies e.g. police	✓		

Priority Work for 2023/24

Consumers	Climate	Competition	Cost	Catalyse	Project	Outcomes	2023/24	2024/25	2025/26
✓	✓	✓		✓	Market-wide Half-Hourly Settlement Programme	Entry into Systems Integration Testing	✓		
						Complete consequential code drafting	✓		
						Implement new code drafting and MHHS Go Live			✓
✓			✓	✓	Evolution of Enquiry and Database Services	Deliver efficiencies through integration of Green Deal Database into Enquiry Service platform	✓		
						Requirements gathering , contract renewal and/or re-procurement		✓	
						Implementation			✓
✓				✓	Priority Services Register	Explore scope for REC to improve PSR coverage and better facilitate ‘tell me once’ principle	✓		
✓		✓	✓		Third Party Intermediaries	Explore what if any role the REC could play in assuring the conduct of Third Party Intermediaries	✓		
	✓			✓	Net-Zero RECCo	Publish our Carbon reduction plan	✓		
				✓	Code Reform	Engage with Ofgem and stakeholders on further code reforms	✓		
						Implement anticipated reforms to code governance		✓	

Data and digitalisation

2023/24

Consumers Climate Competition Cost Change/Catalyst

Last year we stated that we would develop a digitalisation and data strategy to deliver data and service improvements, consistent with the insights and user stories developed collaboratively with REC parties and other stakeholders. We are well on the way to delivering that aim with an increase in agile delivery; review of our data sources; identification of user experience improvements and facilitation across industry of consumer consent.

Open Data

Although we are not directly captured by the obligations placed upon network licensees to comply with [Ofgem’s Data Best Practice Guidance](#), we set out in our previous Forward Work Plan that the development of our services will account for that guidance where relevant. For instance, in 2022 we started the review and catalogue of our data sources. This included classifying of data items to enable data to be opened securely and data protection regulations to be applied fairly, so that more data can safely be accessed under the REC. This work continues in 2023 and beyond as new data items, sources and uses become prevalent. Understanding and cataloguing is only the start and in 2023 and beyond we anticipate changes to the REC and associated services to improve access under the standard REC change processes.

Consumer Consent

To enable many future market innovations, deliver Net-Zero and reduce energy cost to the consumer the Energy Digitalisation Taskforce identified the need for a consumer consent portal. RECCo is well positioned to facilitate this across industry and identify the best way forward for industry to deliver this as a positive outcome for the consumer. We see this as a step-wise approach: first we will identify stakeholders and learn from other projects (e.g. Open Banking, Mi-Data); second we will identify consumer needs, both current and future, and what type of control consumers will need over their data; and third we will create a minimum viable product which allows the testing of consumer needs and to understand technology risks before embarking on a major technology project.

Data Quality

The REC performance assurance framework will have a key role in maintaining standards of data quality. However, in some cases the quality of data may be so poor that it cannot simply be maintained or incrementally improved through normal performance assurance techniques. We recognise that in some cases no individual party may be able to take the necessary actions to improve the data, with the assistance of peers or other third parties being required. In such cases, we consider that RECCo will be able to play a facilitating role. For instance, we have asked the Code Manager to provide support to the Data Working Group of the Switching Programme, which has focused on improving the quality of specific data items such as related MPANs and converting plots to postal addresses. Such initiatives have occurred previously, though these tend to be one-off events or in facilitation of a particular industry programme, with standards again degrading once the spotlight moves on. While these are expected to fall within scope of performance assurance post-CSS implementation, there may be a requirement for additional targeted support. Through combining the ability to undertake one-off exercises with the ongoing monitoring and assurance enabled by the REC performance assurance regime, we will be well placed to initially drive and then maintain improved data standards.

We consider that there may be much greater opportunity to add value and address some of the issues in the market arrangements by identifying the pinch points which require parties to employ exceptions processes, which are often manually intensive and therefore expensive. By working with REC Parties and wider stakeholders to articulate user stories, we will develop a clear and agile framework for the development of the REC as a product, and associated REC Services.

Data and digitalisation

2023/24

Consumers Climate Competition Cost Change/Catalyst



Digital Services

In delivering REC services we have sought to embrace a digital-first approach, particularly through the levels of functionality that are or will be offered via REC digital tools such as the REC Portal and the EMAR. We will continue to make incremental improvements to the REC Portal and EMAR, as well as other services such as CSS and the enquiry services.

Secure Smart Energy System (SSES)

BEIS recently consulted on the development of arrangements to grow and evolve the markets for demand-side response services (DSR) and energy smart appliances (ESA). Key considerations will be what standards, rules and principles might be needed to ensure interoperability, cyber security, data security and privacy, and grid stability whilst delivering good consumer outcomes. We understand and support the drive for Net-Zero, and acknowledge the estimated £10 billion in savings which DSR and ESAs may deliver.

We believe that consumer engagement and consent will be critical to the adoption of technologies which will facilitate Net-Zero and that REC will have a role to play under SSES. Consumers must have trust and confidence that there are sufficient protections, choice and flexibility if they are to adopt such technologies. We believe RECCo and the Retail Energy Code (REC) are well positioned to help facilitate this work. [See our response to the BEIS consultation here](#). Interoperability across providers/propositions will be key to delivering consumer protections, flexibility for consumers to move when their circumstances change, and a reduction in the scale (and associated costs) of future change without stifling innovation. This will enable a competitive market for these new services.

API Gateway & Microservices Architecture

RECCo is looking to simplify access to and improve the security of the services provided. A microservices architecture and API (Application Programme Interface) gateway, which performs authentication and authorisation is technically an architectural approach which can simplify access (lower number of access points); improve security (reduced risk of toxic access controls) and provide flexibility (enable increase variance in digestion of data). This also provides the upside that services behind the API gateway can be altered with minimal impact on industry and therefore enable adapted services and costs efficiencies.

Underpinning the technical architecture will be the embodiment of GDPR as an enabler to securely open up data and protect the consumer. The flexible microservices architecture also enables RECCo to adapt to changing industry needs and develop prototypes, alpha or beta services with differing organisations to move the industry forwards. The API gateway also enables trust to be established with other organisations in a proven technical way to encourage the re-use of data sets and or services to reduce duplication across industry.

RECCo recognises that existing services are critical, so this initiative will not be completed in a big bang way; it will be executed incrementally over time, reducing risk, providing optionality to industry and bringing the benefits described above.

Market-wide Half Hourly Settlement (MHHS)

2023/24

Consumers Climate Competition Cost Change/Catalyst

Expanding half-hourly settlement to market-wide will facilitate the transition to a smarter, more flexible energy system that will bring significant benefits to consumers whilst also supporting the UK’s Net-Zero ambitions.

This reform makes settlement more accurate and timely, opening opportunities for the development of new products and services, such as Time-of-Use tariffs and flexibility services. Ofgem’s analysis predicts that market-wide half-hourly settlement (MHHS) will bring net benefits for GB consumers of between £1.6bn and £4.5bn over the period 2021-2045, largely through the optimisation of infrastructure investment. We recognise the importance of this programme and the challenges of delivering at the scale and speed required to ensure the benefits can be maximised.

We will be required to play a far more significant role than we had anticipated last year. This includes delivering the new and modified IT Systems and business processes required as part of MHHS Implementation, including the mobilisation, design, building and testing of such IT Systems and business processes and their integration.

Five workstreams to ensure the successful delivery of RECCo’s obligations.

1. Regulation and Governance

MHHS will introduce significant changes to the REC baseline, that requires updating and re-drafting which will be undertaken on a stage by stage basis reflecting the phased transition of the programme.

2. Design and Build

As the programme has developed, further changes to REC Services have been identified as needed to meet the MHHS programme requirements. We anticipate these to include:

- Electricity Enquiry Service
- Electricity Retail Data Service
- Central Switching Service
- Secure Data Exchange Service

Whilst we know the programme deliverables are still to be finalised, we have commenced work to understand the implications and consequential changes to these systems so that we can deliver at pace when required. We discuss the key changes and implications more fully in the Event Driven Architecture section.

3. Testing

We will need to ensure that changes made to any services are subject to appropriate testing and assurance and will be required to participate in core MHHS test phases, such as Systems Integration Testing (SIT) and User Integration Testing (UIT).

4. Operational Readiness

We will need to ensure that all impacted operational processes reflect the necessary changes and working as required. We anticipate the changes required to the REC and REC Services as part of this programme will also require changes to the REC Operating model.

5. Stakeholder Engagement

As well as ensuring we proactively engage with the programme at all stages, raising any issues, risks, assumptions and dependencies, we will also ensure REC stakeholders are updated on the progress of the programme and REC/RECCo deliverables. An engagement programme will be developed to ensure regular and timely engagements with our stakeholders.

Market-wide Half Hourly Settlement (MHHS)

2023/24

Consumers Climate Competition Cost Change/Catalyst

Event Driven Architecture

As part of the MHHS Programme, the industry will be required to use a new Data Integration Platform (DiP) which is envisaged to be managed by Elexon. The DiP will underpin ‘Event Driven Architecture’ (EDA) which essentially means that the industry will be able to move away from large-scale batch transmission of data to a specific recipient who will complete certain functions and pass it onto another defined recipient in sequence, to a more dynamic approach which can tell/inform multiple processes of an event or change in data that is relevant to them in near real time. Whilst this may be expected to have many benefits, this approach will supersede many of the traditional data flows that utilise the Data Transfer Network, together with the insights that are currently able to be drawn from analysing that transactional data.

The new processes and EDA that supports them will also require material changes to the way that industry parties currently interact with the Electricity Enquiry Service (EES). The programme has included a requirement for the EES to be updated in near-real time, which means the EES must move away from

the current overnight batch update process, to a system that requires the EES to consume live updates to data. We will explore the most appropriate options and ensure the solution is part of the MHHS test phases. We will evaluate the most cost-effective solution considering both initial/upfront costs to design, build, test and implement the solution as well as ongoing operating costs of the service, and any expected return on investment.

As the programme has developed, it has provided clarity on the requirements and baseline delivery. Accordingly, we have reassessed our role in meeting those requirements. It is now evident that in order to deliver the volume and complexity of change, within the challenging programme implementation timetable, will require additional resource and technical solutions to ensure the most cost effective and efficient options for delivery are procured and managed.



Energy Theft Reduction

2023/24

Consumers Climate Competition Cost Change/Catalyst



Our key theft related deliverable for 2022/23 was the production of the Theft Estimation Methodology (TEM), providing a robust data-driven basis upon which industry could assess the current scale of energy theft. It is hoped that this will provide a more up-to-date reference point for the industry, replacing the often cited but decade-old Ofgem estimate. Based on current wholesale prices, the revised estimate is that between £900m and £1.5 billion of energy is stolen in GB each year. As the cost of stolen energy is recovered from bill-paying consumers, predominantly from domestic households, even a marginal reduction in those current levels of theft could have a material benefit for consumers.

The TEM report also provides several recommendations on how the estimate could be further improved with additional data sets that were not available to the project team. In some cases, that data may become available through the progression of other projects such as MHHS or network operators monitoring non-technical losses. We will continue to explore the means and timing of access to those data sets, with a view to re-running the theft estimation when there is opportunity to improve its accuracy. We have provisionally scheduled that exercise to take place in 2024/25. However, even with the current wide range and margin of error, we consider that the TEM provides a sound baseline against which to assess the proportionality and in due course the success of theft mitigation measures.

Our thinking on theft mitigation measures has been greatly assisted by the output of a workshop held in November. Attended by over fifty representatives from the energy industry and wider stakeholders, such as Ofgem, the police, fire brigade and consumer groups, the event took place in an ‘Accelerated Solution Environment’ (ASE) aimed at understanding

problems and developing solutions at pace. Although the problems of energy theft is not new, the backdrop of a cost-of-living crisis driven by rising energy prices gives increasing urgency to tackling the issue, not least with the government announcing that the Energy Price Guarantee (EPG) will rise to £3,000 from 1 April 2023. This was followed by Ofgem’s revision to its Default Tariff Cap, suggesting that if the EPG was not in place, typical domestic energy bills would be £4,279 – a 21% increase on the current cap. Analysis provided at the ASE showed that rises in energy prices see a correlating rise in energy theft as well as evidence of the increasing volumes of messages around energy theft on social media.

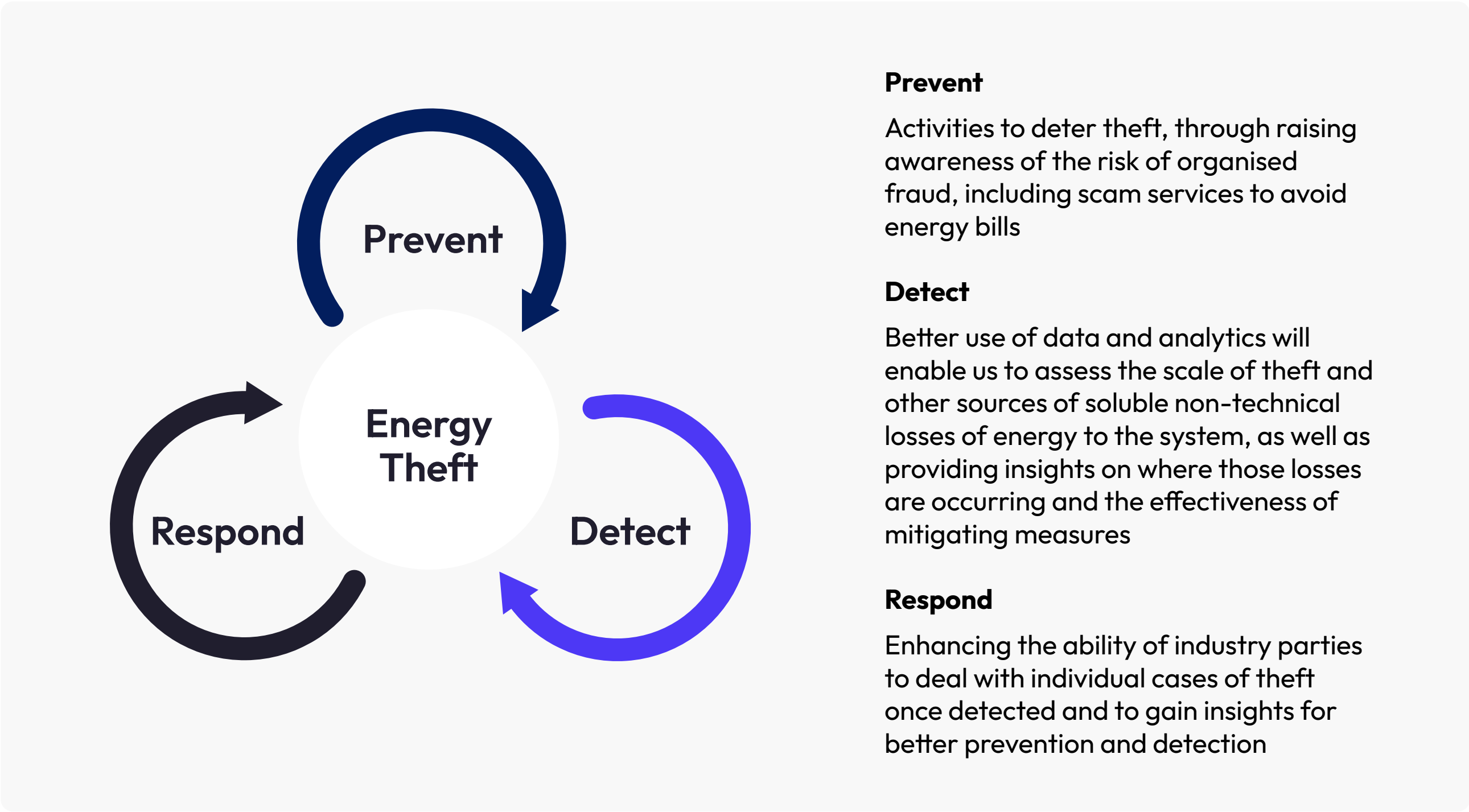
The actions of the workshop identified many practical steps that can now be taken to improve the industry’s collective response to energy theft. We will maintain the full actions log, which has been published on the RECCo website alongside the Theft Reduction Strategy, which aims to improve the efficacy of the energy industry’s collective efforts to tackle energy theft by taking a whole-of-system approach and facilitating greater collaboration between actors. The Theft Reduction Strategy will offer a holistic approach to addressing energy theft by highlighting prevention, and encouraging a better and more proactive response. Informed by learnings from other sectors, the strategy will not just focus on the detection of theft, but also on improving industry parties’ ability to respond effectively. Most importantly, given the risk to safety inherent in all energy theft we will continue to focus heavily on prevention, while recognising that the impacts of this are harder to quantify.

Energy Theft Reduction

2023/24

Consumers Climate Competition Cost Change/Catalyst

Components of the strategy will be complementary, as set out in the graphic below:



Summary of Next Steps:

1. Re-establish a dedicated theft expert group and representative stakeholder forum
2. Significantly raise awareness through education programmes so that consumers and market participants alike are fully aware of the impact of theft as a safety risk, its consequential financial impacts and how to report theft through the Stay Energy Safe campaign run by [Crimestoppers](#)
3. Develop theft prevention, detection and response data hub and analytics for the benefit of industry parties
4. Improve incentives. Improvements to the Theft Detection Incentive Scheme administered by RECCo in the short term and a pan-industry code review to better align all theft incentives and disincentives in the long term
5. Consider the feasibility of improving police focus on energy theft

Evolution of Enquiry Services

2023/24

Consumers Climate Competition Cost Change/Catalyst

Following the successful implementation of the CSS, we recognised that the role of and contact points for the gas and electricity enquiry services needed to be clearer. Moreover, in a world where dual fuel is more common, we questioned why there is a separation of the enquiry services.

To this end, we believe there is a strong case for the more efficient and cost-effective delivery of the gas and electricity enquiry services potentially through consolidation into a single service.

There are significant benefits to be had by combining the enquiry services, not least the creation of a single source of data, which parties can easily access via a single mechanism but also reducing running costs of two independent systems and providing a platform for future improvements and innovations.

Enquiry Service

Reviewing the enquiry services is not only an opportunity to ensure we are maximizing our use of existing assets but to think more broadly about its functionality.

There are two key areas that could also be supported by a single enquiry service

Additional opportunities

SDEP

This is currently a secure messaging system between parties and largely used to resolve issues. If it is moved into the enquiry services, it can form part of the incident management process. Setting Service Level Agreements would ensure improved quality and reduced resource requirements for parties.

Green Deal Database

Overtime the number of live green deals will decrease whilst the cost of the database itself will endure. The database is currently due for re-procurement and we believe adding the green deal database into the enquiry services would be more cost effective.

Reducing the cost of the Green Deal Central Charging Database Service

The primary purpose of the GDCC is to facilitate the creation and administration of Green Deal Plans in Great Britain by providing a point of reference and interaction between relevant Green Deal Users. The GDCC consists of the GDCC database, the GDCC application layer and a user web interface.

We are committed to delivering operational efficiencies, continual improvement, cost savings and value for money wherever possible. Working closely with our service provider C&C Group, we set a challenge to deliver material cost-savings through a low-risk solution that would not adversely impact upon the GDCC user community, who should see no alteration to their day-to-day interaction with the application or their business processes. C&C Group is expected to meet all of the objectives set for them. From April 2023 the cost of delivering the Green Deal Central Charging Database Service ('GDCC') will reduce significantly by c.£600k in the period until July 2025..

The evolution of the GDCC is the first step in our transformation of data services as we aim to deliver both better value-for-money and continuous and agile improvement to meet the requirements of the changing energy market, and remove the obstacles that legacy systems present.

Priority Services Register

2023/24

Consumers Climate Competition Cost Change/Catalyst

The cost-of-living crisis is further highlighting the importance of the Priority Services Register (PSR) for a growing number of consumers. Last year, we set out our ambition to work towards a ‘tell me once’ principle, so that those in already challenging circumstances are not further encumbered by barriers that prevent them receiving the right assistance. We remain committed to this workstream.

Across the industry, we see a number of initiatives are looking at how PSR data can be more readily shared between utilities and positive steps are emerging from these programmes. We believe that there are some key first steps that can be implemented in the retail energy space that could facilitate a ‘tell me once’ principle. This could be achieved by taking an outcomes based approach by only opening up and integrating the data that is required to achieve the right outcome for the consumer. This also ensures that personal or sensitive data is still securely held by individual retail energy suppliers.

We know that sharing all the data in a new central solution is challenging and costly and may take many years to implement. We believe there is value in using existing systems and processes to the extent that they are able to facilitate change. There is merit in exploring, as a minimum, the addition of a flag in the current gas and electricity enquiry services that acts as an indicator to relevant parties that a PSR need exists.

We consider that this could be the first practical step towards the sort of integrated approach to Consumer Consent referred to in our Digitalisation and Data strategies.

We will host an industry workshop with stakeholders to explore the approach to and feasibility of better integrating PSR data, and using the leverage of common governance provided by the REC (for energy industry participants at least) to bring together and provide greater cohesion to the initiatives that are already taking place in this area.



Third Party Intermediaries (TPIs)

2023/24

Consumers

Climate

Competition

Cost

Change/Catalyst

We will seek to develop the REC in a manner that reflects the structure of the retail energy market and ensure that consumer interests are protected regardless of which market participant they may deal with. Following its Microbusiness Strategic Review, Ofgem has introduced new requirements for suppliers to only use brokers if they adhere to a Code of Conduct and operate an Alternative Dispute Resolution (ADR) scheme. One such scheme is operated by [the energy ombudsman](#).

As we have previously indicated to Ofgem in our response to its Microbusiness Strategic Review, we consider that it would be appropriate for any rules of TPI conduct to be set out in an industry-wide code that can be enforced impartially and effectively. Attempts by individual suppliers to enforce higher standards may simply drive unscrupulous brokers elsewhere and skew competition in a manner that is detrimental to consumers.

We believe that the appropriate tools will be available under the REC to ensure that any standards are complied with.

In order to determine whether or not the REC has any role in the governance of TPIs that may alleviate the burden on individual suppliers, we will host separate workshops in early 2023 to gain the perspectives of the suppliers and broker communities. In the event that there is support for a REC governed Code of Conduct we anticipate that there would be a piece of work to develop a document which sets out the necessary principles and clarifies how it would operate. We have not included any dedicated budget beyond the development stage to operate any resulting scheme, as we consider that the costs of operating such a scheme, including any registration and accreditation of brokers against the scheme would suitably be recovered on a cost-reflective basis in the same way that the metering accreditation scheme(s) operate, rather than being bundled with core RECCo costs.



Net-Zero RECCo

2023/24

Consumers Climate Competition Cost Change/Catalyst

In our 2022/23 Forward Work Plan we committed to becoming a Net-Zero organisation in the coming 2-3 years. We have now begun our journey by partnering with Positive Planet, which will support us through carbon footprint measurement, a 1-year carbon reduction plan and finally, carbon offsetting which will result in carbon neutral accreditation.

We have chosen to follow this route in the first instance so that we can really understand our emissions and the impact we are able to make within 1 year from following our carbon reduction plan. With the clarity we'll gain from seeing through the carbon neutral accreditation process, we intend to build our Net-Zero target and associated strategy in late 2023.

In addition to doing the right thing by becoming a Net-Zero company, we anticipate that there will be learnings from our own journey that we can share with others and apply to our work more generally.

Supporting retail energy achieving Net-Zero

As the energy industry transitions to Net-Zero, there may be implications for REC and the retail energy market that require us to proactively support developments. We anticipate these to be longer-term initiatives that will be driven through the development of government policy initiatives or the effects of disrupters in the market. We will no doubt see a number of challenges to the traditional energy supply chain as new technologies and business models emerge. We recognise the trend towards the provision of energy as a service, for most domestic consumers, rather than as a commodity with largely price-based competition. In our current economic climate, combined with the varying factors driving down the options to switch providers, consumers will also drive change in behaviours and expectations of how they engage with the energy supply market. Our work on MHHS will enable the retail energy industry to develop products that will offer consumers greater choice and contribute to a more flexible grid. Additionally, our strategy on data and ditalisation will support the industry in improving the quality of data, sharing it more readily and in digital formats so that it can keep pace with the changes that will be required to support our move to Net-Zero.

For our longer term work, at this stage, it is still too early to propose specific and fully costed Net-Zero project(s). Nevertheless, it is important that we remain cognisant of the changing environment and emerging policies that are likely to shape the future of the retail market, so that we may prepare and evolve the REC and RECCo services to support future market states. As we set out last year, we will continue an active watching brief on the topic of Net-Zero, raising our stakeholder awareness of, and in turn, their ability to influence developments.



2024/25

Mid-term

In this section, we set out our view of mid-term strategies and priorities. There are a number of issues which we reasonably expect will have an impact upon REC activities and require engagement from RECCo and/or the Code Manager, but for which we cannot determine the timetable and/or will be required to react to externalities. We have included a prudent provision for such work within the

2023/24 projected budget where appropriate, but in the absence of a known timetable consider that this is preparatory work for what may follow, rather than being able to identify specific deliverables for the next financial year. Where such anticipated but as yet unscheduled areas of work also impact upon the Codes Roadmap they will appear as part of the undated and as yet non-prioritised backlog, pending clarity on those external dependencies.

Codes Reform

Consumers Climate Competition Cost Change/Catalyst

We are currently awaiting the progression of the Energy Security Bill which contains measures aimed at addressing the government’s concern that: “there is currently little incentive for industry to change these rules in a manner that would be contrary to their own interests, even if those changes would benefit consumers or further the government’s strategic priorities.”

The aim of the Bill is therefore to create “a new governance framework for the energy codes that will move the responsibility for code governance to one or more newly created code managers instead. These code managers will be directly accountable to Ofgem rather than the industry, which will allow Ofgem to drive strategic change across the codes for the benefit of consumers and competition.”

Ofgem has also indicated that it plans to use transitional powers provided to it under the Bill to pursue further code consolidation.

There are some more granular aspects of the proposals which may have an impact upon RECCo and/or the REC in addition to us becoming subject to licence. For instance, Ofgem has indicated its intent to replace the decision-making role of code Panels and replace them with decision-making by the code manager, with input from a Stakeholder Advisory Forum. We consider that the REC change management model already fulfils the intent of the Codes Reform proposals, as it was developed in parallel with the early development of those proposals. However, once Ofgem’s further proposals have been published we will carry out a gap analysis of our current model against them. To the extent that there is any divergence from the current model and Ofgem’s proposals and we agree that convergence would be beneficial, we will seek to progress them on a proactive and agile basis rather than necessarily await any prescription to do so.

Transition to Next Day Switching

Consumers Climate Competition Cost Change/Catalyst

In the 2022/23 Forward Work Plan we said that we would monitor the performance of the new switching arrangements and working with the CSS, the Code Manager and the Performance Assurance Board, seek to identify and resolve any issues that may prevent a further move to Next Day Switching as standard. Whilst we consider that this will still be an important piece of work, current market conditions have obviously had a huge impact upon rates of switching and in all likelihood the importance that the consumer places on the speed of the switch as compared to other considerations.

The emergence of the Codes Roadmap and a clearer framework for the progression of continuous change in an agile manner also provide opportunity to rethink our approach to pieces of work such as this. We consider that this would still best be taken forward as a collaborative effort between the CSS, the Code Manager and the Performance Assurance Board, the timing and conditions for progressing with such a change should be informed by performance of the current systems, identified areas for improvement and other insights. While RECCo itself will continue to be fully engaged, we consider that it is appropriate for those bodies to take the lead, and in due course progress such a change through the now established REC change management process. The cost of such a change would be identified as part of the associated impact assessment and if approved through normal REC governance would appropriately be drawn from the REC change allowance rather than a dedicated project budget. We consider that the status of Next Day Switching should therefore be captured as part of the Codes Roadmap rather than as a RECCo deliverable as part of this Forward Work Plan.

2025/26+ Longer-term

In this section, we set out our view of longer-term strategies and priorities. There are several areas of work where we have identified the need for an active watching brief, but have not yet identified any specific project that is tangible or material enough for inclusion in this Forward Work Plan.

Electric Vehicles

Consumers Climate Competition Cost Change/Catalyst

The adoption of electric vehicles (EV) is accelerating, and it is anticipated that there will be some 11 million plug in EVs on our roads by 2030. The impact of this growth has huge implications across the energy industry and not least in managing the grid so that supply remains robust and able to cope with changes in patterns of demand. However, the flip side of the additional demand for electricity to charge EVs, they also present opportunity, in effect acting as mobile batteries that can offer system flexibility when needed.

There are also links to other elements of our strategy. For instance, the growth of EVs was highlighted at our Theft Reduction workshop as having potential to change the scale and nature of energy theft, with the point of illegal abstraction potentially being remote from the premise. The development of EV charging will therefore remain an important focus of this workstream.



Heat network governance

Consumers Climate Competition Cost Change/Catalyst

The decarbonisation of heating will be critical if the UK is to meet its emission reduction targets. While some of this will be facilitated at the level of the individual premises by installation of technologies such as air or ground source heat pumps, the government is also pursuing an expansion of local heat networks and has confirmed that these will be regulated by Ofgem. While progress of the Heat Strategy is in large part dependent upon the progression of facilitating legislation through parliament, it is currently unclear what the timescales may be for the introduction of a new licence framework and industry governance. However, we anticipate that that framework will follow a similar model to electricity and gas, with obligations being captured at a relatively high or principles based level within licence, while prescription may be provided at the lower level of an industry code. It is unclear whether those arrangements will provide for any form of retail competition at the end of the local monopoly heat network, though there are a range of consumer protections that we would expect to be afforded to heat consumers, comparable to those of a gas or electricity consumer. For instance, there should be an equivalent approach to the Priority Service Register and billing regulations.

With the industry having only recently been through a resource intensive consolidation exercise to create the REC, we consider that there is a strong case for Ofgem and/or the government to consider extending the remit of the REC to include heat, ensuring for instance that there is no diminution of protection for those consumers whose properties may transition from natural gas to direct supply of heat. It is likely that this will also allow for the realisation of economies of scale and other synergies.

2025/26+ Longer-term

In this section, we set out our view of longer-term strategies and priorities. There are several areas of work where we have identified the need for an active watching brief, but have not yet identified any specific project that is tangible or material enough for inclusion in this Forward Work Plan.

Hydrogen

Consumers Climate Competition Cost Change/Catalyst

The conversion to hydrogen has the potential to make a significant contribution to emissions reductions, either as a direct replacement for natural (methane) gas or as a means to efficiently store energy that may be intermittently generated through wind, tidal or solar technologies. The UK government’s Hydrogen Strategy is focused primarily on developments that may come on stream later in this decade, though there are several trials that will commence in the nearer term. For instance the [H100 Fife project](#) plans to convert at least 270 existing natural gas consumers in Fife from a methane-based energy source to a 100% hydrogen energy source. Whilst it is intended that this and other trials will be conducted with minimal disruption to the existing arrangements, we have identified and sought to pragmatically address some issues which do impact upon the REC arrangements. In particular, utilising the REC Sandbox arrangements we are progressing a derogation to the requirement for metering arrangements to be in accordance with the Code of Practice.

We have also initiated a focused review of the Metering CoP, which itself has recently been reviewed and a new consolidated code implemented, to consider the practical implication of extending the metering accreditation scheme to incorporate hydrogen meters. Completion of this review should better inform and facilitate the installation of hydrogen meters beyond the limited numbers of the trials, while maintaining consumer protections and other standards assured by the scheme.



Foreword to the 3-Year Financial Projections



Brian O'Shea
Director of Finance and Commercials

The Retail Energy Code Company (RECCo) is the corporate vehicle for ensuring the proper, effective, and efficient implementation and ongoing management of the Retail Energy Code (the REC).

The retail energy market has undergone significant change over the last year. It has become clear that a strong consumer focus, balanced with sustainable and efficient market and business practices are integral to the success of a robust retail energy market. RECCo, in its role as intelligent customer procures, manages and transforms REC Services, systems and processes. In doing so we need to strike the right balance between what is needed to address today's challenges, while preparing for what is needed in the future.

We are cognisant that we are spending industry and consumers' money and we have an obligation to deliver secure scalable, adaptable services which are economic and efficient. This obligation extends to our internal and external resources. RECCo is responsible for 17 centralised services which support industry in discharging their regulatory obligations.

Many parts of the retail energy market are evolving including; the introduction of new business models, Supplier exits, and the recent delivery of

the Central Switching Service ('CSS') to support faster and more reliable switching. There are other changes, like the Market-wide Half Hourly Settlement ('MHHS') programme that will have a material impact on the retail energy market and consumers, and for which we have an obligation to deliver a key element.

In line with good corporate practice, the RECCo Board is providing 3-Year financial projections to enable REC Parties to plan for the longer term and provide financial context to the strategic plan. A detailed 2023/24 Budget will be issued for REC Party consultation in February.

The 2023/24 Budget shows a 35% increase on the costs we expected for this coming year, with 75% of the increase being attributable to higher CSS charges than previously signalled by DCC and the impact of delivering a more comprehensive set of obligations in the MHHS programme. The remaining 25% balance is due to a combination of some project work (e.g. on Theft and Data) being deferred from Financial Year (FY) 2022/23, inflationary impacts and the internal resource requirements needed to fulfil the maturity of the RECCo organisation.

The CSS costs provided by DCC represent a c.80% increase on those previously published by them in August 2021 for RY 2023/24. We

used those published costs to inform our original expectations for FY 2023/24. In line with our role as intelligent customer and having carefully considered the rationale provided by the DCC, we have challenged their estimates and we will use the powers available to us under the REC, including referral of the budget to Ofgem for determination, if required, to ensure the costs charged are economic and efficient. MHHS project costs have increased c.500% from our original expectations. As the MHHS Programme has been revised and replanned, based on the latest available documentation and information from the programme, there has been a material increase in the scope, scale and complexity of REC and REC Service obligations incumbent on RECCo to deliver than originally envisaged in previously available programme documentation and information.

The maturing nature of our services means we are better informed on the level and nature of resource required to deliver our obligations and manage our services effectively and efficiently and we take the opportunity to right size our internal RECCo organisation accordingly. That said, unless our remit changes materially over the coming years, we would not expect any change in our internal capacity and capability. **Over the planning period, our operating costs as a percentage of total budget remain broadly static at c.9%.**

Foreword to the 3-Year Financial Projections

Through sound financial management of our resources, stringent scrutiny of change costs, not utilising the budget contingency, fully exercising our rights to recovery of service credits for non-performance by our service providers and internal capacity constraints, we expect to underspend against our 2022/23 Budget. We will return this underspend to funding Parties as a reduction against their 2023/24 charges. This will help mitigate the impact of the increased costs for 2023/24.

Our strategic plan, which builds on the success of the establishment of the operational go-live of the REC v3, the maturing of the Code Manager and seamless continuation of other services transitioned from existing governance arrangements in 2021, sets out the actions we plan to take over the one-to-three-year period of that plan. We have engaged with industry in the development of our forward work plan.

The plan strikes a balance between embedding stability, improvement, and evolution of the REC Services, delivery of industry initiatives such as MHHS as well as theft and data initiatives. Each of the proposed initiatives will either improve upon existing activities or has been signalled by BEIS or Ofgem as an anticipated regulatory requirement that we can assist REC Parties in discharging. None are speculative.

Our Forward Work Plan will focus on:

1. Ensuring REC Services are delivered on time, on budget and to the quality standard required.
2. Delivery of REC components of MHHS programme.
3. Data and Digitalisation strategies including industry required initiatives such as Secure Smart Energy System and Consumer Controlled Data and Consent.
4. Theft Reduction Strategy initiatives.
5. Evolution of Enquiry Services including preparation for future rationalisation of the three existing enquiry services.
6. REC policy initiatives to support market development e.g., Priority Services Register, Third Party Intermediaries.

RECCo has adopted an outsourced service delivery model. This model enables it to achieve two key objectives. Firstly, service providers are required to deliver against contracts with clear requirements, quantitative and qualitative standards (KPIs) which have financial and contractual consequences for non-performance

and to demonstrate continual improvement. To achieve this first objective, RECCo must proactively manage its service providers and to do so it needs an appropriate level of resource capacity and capability which is proportional to its obligations. In the main, RECCo is contracting with non-industry owned large commercial organisations. The effectiveness of our operational service delivery management approach is evidenced by the recovery of in excess of £900k of service credits in 2022 coupled with a strong customer satisfaction result reported through the recent independent stakeholder satisfaction survey.

Secondly, it allows for periodic procurement of best-in-class service providers. Our procurement objectives are clear; we will act as the intelligent customer on behalf of industry and procure services that are value for money, scalable and adaptable. We will competitively procure wherever possible and (if economically and technically advantageous to do so) as early as possible and as often as required. We are cognisant that in doing so we are investing industry money not RECCo money and we will always strike a balance between innovation and return on industry investment already made. In 2022 we worked with our Green Deal Central Charging service provider to re-engineer the service delivery model and secured c.£600k

of cost reduction. We have also engaged with the Gas Enquiry Service provider to seek to re-engineer the charging model for the service with the aim of reducing the overall costs. The provision of the CSS service by DCC is mandated through the REC rather than a standalone contract, nonetheless, we adopt a commercial approach on that service and we are utilising the powers available to us under the REC to challenge the proposed costs.

To achieve its objectives, RECCo must be a right sized expert organisation, consisting of employees with a deep understanding and knowledge of the REC Services. This enables internal knowledge development and retention. Increasingly, our services are becoming data services and the management of these require a new skill set for the organisation. Alongside this, it must remain current with energy market developments, engage proactively with its stakeholders, manage its finances and commercial arrangements and set out a strategy and forward workplan which will achieve the REC Objectives.

Financial Overview

1 2

RECCo, like other businesses, is operating in a period of unprecedented market instability including challenging supply chains, increasing levels of inflation and wage demands and talent shortages. This is amplified by the current issues facing the energy market. **We recognise the challenges facing REC funding parties and will, wherever possible, look to minimise the financial impact on them, to the extent that doing so would not compromise our ability to deliver the REC Objectives or meet its financial liabilities.** We utilise a bottom up budget approach and our projections include a modest value of contingency. Other than for the MHHS project, reflecting the early life nature of that project and the emerging RECCo obligations, we have not included any project or service specific contingencies.

As we continue to mature as an organisation we benefit from a better understanding of the nature, volume and complexity of issues which RECCo is either mandated or requested to resolve and the services and service providers we are required to manage to ensure they deliver quality services economically and efficiently. Greater clarity and transparency have emerged on industry initiatives such as MHHS as well as further likely increases in regulatory activities signalled by BEIS or Ofgem.

In our 2022/23 Budget we identified several budget allowances which carried a high degree of estimation risk. These included the allowances for CSS charges, MHHS project costs and the Gas Enquiry Service.

The expected costs for FY 2023/24 show a £14m increase on those which were originally expected for that year. Seventy-five percent (£10.5m) of this increase is due to CSS costs (c.£8m) and increased MHHS Project costs (c.£2.5m). Of the remaining £3.5m balance, c.£1.5m reflects the deferral of project costs from 2022/23 into the Budget year with the remainder reflecting a combination of right sizing the internal organisational resource, inflationary impacts on a small number of REC Services contracts and higher than expected Gas Enquiry Service charges.

The REC includes powers which allow us to challenge the CSS forecast charges. Inter-alia these include requiring early sight of forecast charges which must be evidenced, exclusion by DCC of any contingency or change allowances within their estimates, the ability of the REC Board to request explanation of the charges and, crucially, the ability to refer disputed charges to Ofgem for resolution. RECCo has submitted a comprehensive challenge of the

charges to DCC. RECCo will, if required, utilise all the powers available to it under the REC.

In July 2022, responsibility for the delivery of the Gas Enquiry Service (GES) was transitioned to RECCo from the Switching Programme. The service is provided by Xoserve with a significant element of the service outsourced to a key sub-contractor. The costs of the service exceeded our expectations and are in excess of those for the equivalent Electricity Enquiry Service. RECCo has engaged with Xoserve to carry out a value engineering exercise to assess the potential for a restructuring of the charges with the aim of achieving a significant reduction. RECCo is committed to achieving efficiency in its REC Services and as such we will initiate a project in 2023/24 to identify how best to rationalise the three current enquiry services (Green Deal Central Charging, Electricity Enquiry and Gas Enquiry services). We plan to have a consolidated enquiry service in 2025. This review is timed to ensure that RECCo, and industry, achieve a return on the investment made in the separate services as part of the switching programme and aligns with contract renewals.

Any reduction in CSS or GES costs will be returned to REC funding Parties in full at the

earliest opportunity. If known by the date of the publication of the 2023/24 Budget for consultation in February, the budget will be adjusted accordingly. If resolved at a later date, RECCO will adjust its charges intra-year to reflect an immediate return to Parties.

During 2022, the scale, scope and complexity of RECCo’s obligations under the MHHS project were clarified. We will now be required to play a far more significant role than we had anticipated last year in preparing for the consequential impacts of the programme and ensuring timely delivery of changes and obligations that arise. This includes the requirements for RECCo to deliver a suite of complex changes to the Electricity Enquiry Service in accordance with the MHHS Implementation Timetable.

RECCo is not immune to the current “cost of living” crisis and the impacts of high levels of inflation. However, we have been able to partly mitigate the impact by placing fixed price contracts which are not subject to indexation for their initial terms. This contributes to the broadly flat cost profile on key services such as Code Managers and Electricity Enquiry Service.

Financial Overview

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We have retained the Change Allowance at the rate expected for the year. The increase in the allowance compared to 2022/23 reflects a combination of RECCo assuming full financial liability for all CSS change costs from 01 April 2023 and the full year impact of the new enhanced enquiry services. All proposed change costs are subject to a series of gated assessments (both by the Code Managers and by RECCo internal processes) to ensure they deliver the requirements and also reflect value for money.

In line with its REC obligation to develop budgets on a bottom-up basis, the Contingency Allowance included has been maintained at a modest rate (3.5%). This contingency is to mitigate inherent uncertainty in the market and hedge against any future further regulatory requirements developed by BEIS or Ofgem and to guard against market instability. Where appropriate the individual budget allowances reflect any inherent risk associated with that activity, in particular, we have included a project specific contingency within our MHHS forecasts.

RECCo operates on a non-profit basis with its income matching its costs in each financial year. Any underspend (including change allowance and contingency) against the overall budget is returned to funding parties as a rebate against the following year’s charges. RECCo expects to underspend against its 2022/23 Budget and this underspend will mitigate the impact of the increased charges for this year.

Table 1 (seen on the right) provides an overview of the 3-year indicative financial projection. The original expected costs for 2023/24 are shown for comparison purposes

		2023/24 Expected £'000	2023/24 Budget £'000	2024/25 Indicative £'000	2025/26 Indicative £'000
REC Services Services which are live and in operation currently	Central Switching Service (CSS)	11,000	19,200	21,331	23,699
	Code Manager	10,000	10,010	10,713	12,184
	Enquiry Services	5,175	6,313	6,731	6,502
	Theft Services	2,400	1,004	3,104	3,210
	REC Support Costs	600	692	600	600
	Other Services	50	246	223	232
		29,225	37,465	42,702	46,427
RECCo Operations	Board, Staff and Operating Costs	4,150	5,141	5,300	5,802
		4,150	5,141	5,300	5,802
Projects and Workstreams Proposed initiatives for the coming year	MHHS	450	2,854	3,704	2,362
	Data Programmes	350	2,075	1,238	1,338
	Theft Reduction Budget	350	1,465	675	675
	Enquiry Service Procurement	0	467	161	41
	Code Manager Procurement	0	248	518	326
	REC Policy Initiatives	250	250	250	250
	Other Projects	350	225	225	225
	MSC Projects	500	0	0	0
		2,250	7,584	6,771	5,217
	Total	35,625	50,190	54,773	57,446
	Change Allowance	4,000	4,000	4,000	4,000
	Contingency	2,100	2,000	2,000	2,000
	TOTAL	41,725	56,190	60,773	63,446

REC Services

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RECCo is required to provide 17 REC Services and our operational ethos is that we are the accountable service provider to REC Parties. The Code Manager is not responsible for the procurement or management of the REC Services or the service providers. RECCo took on operational responsibility for the full suite of current REC Services at REC v3 publication in July 2022.

CSS

From July 2002 CSS operational delivery is governed by the REC, however, financial liability for the operational costs will not be taken on by RECCo until 01 April 2023. Until that time, CSS costs will continue to be recovered through the Smart Energy Code. The original indicative costs for 2023/24 of £11m were based on the published expected costs by DCC for switching in their 2021 Business and Development Plan. The revised expected costs of £19.2m were

provided by DCC in Q4 2022. These show a c.80% increase on those previously published by DCC. We have challenged the cost estimates as being neither economic nor efficient, in particular, the overall level of resource deployed on the service, the resource cost allocation methodology and several external contracts which were procured without consultation with RECCo. DCC are required to respond to the comments by end of January 2023. However, if the REC Board considers that DCC has not taken sufficient account of its comments, it may refer the forecast charges to the Ofgem for determination, pursuant to Clause 9 of the REC. As RECCo is required to consult on its detailed 2023/24 Budget with REC Parties in February, if we have not received any determination from the Authority by that time, the consultation will set out the full extent of the prevailing DCC forecast.

Code Manager

Code Manager costs for 2023/24 are not materially different from expectations. This reflects the fixed price nature of the contracts and the management of service change in the prior years. For subsequent years the

	2023/24 Expected £'000	2023/24 Budget £'000	2024/25 Indicative £'000	2025/26 Indicative £'000
Central Switching Service (CSS)	11,000	19,200	21,331	23,699
Code Manager	10,000	10,010	10,713	12,184
Enquiry Services	5,175	6,313	6,731	6,502
Theft Services	2,400	1,004	3,104	3,210
REC Support Costs	600	692	600	600
Other Services	50	246	223	232
TOTAL	29,225	37,465	42,702	46,427

projections include a small budget allowance to fund the enduring impact of any in-year service changes. The uplift in years 2 and 3 reflect the impact of the indexation charges which apply for the periods after the initial contract term to September 2024. RECCo is committed to competitive procurement as early and as often as it economic to do so. In 2023/24 we will develop a procurement plan for the re-procurement of code manager services. This is likely to reflect a staged approach and a potential re-packaging of service elements.

Enquiry Services

Enquiry Services reflect the combined costs of the Electricity Enquiry Service (EES), the Gas Enquiry Service (GES) and the Green Deal

Central Charging (GDCC) enquiry service. The costs for 2023/24 show a step up compared to those originally expected and these are almost wholly attributable to the GES. In our 2022/23 Budget we noted that the GES cost included a material cost estimation risk. As noted earlier, operational and financial responsibility for the GES was transitioned to RECCo as part of the switching programme, meaning we were unable to competitively test the service cost. The service is provided by Xoserve who in turn outsources a significant element to a key sub-contractor. RECCo has initiated discussions with Xoserve to assess the opportunity for a value re-engineering exercise with the aim of reducing the overall costs. Similar to the Code Managers, we will be initiating a project in 2023 to plan for the competitive procurement of a future rationalised single enquiry service.

REC Services

Theft Services

Theft services reflects the costs of the Energy Theft Tip of Service and the associated marketing and awareness campaign. The reduction compared to expectations reflects the deferral of further theft services to 2024/25. As part of our Theft Reduction project budget, we will consider and evaluate the requirement for a theft data analytics service and/or a theft investigation or prosecution service. Each will require a robust business case which demonstrates a positive consumer outcome.

REC Support Costs

REC Support Costs includes allowances for legal review of REC Changes as well as costs of funding independent members of both the Change Panel and Performance Assurance Board. The REC requires RECCo to fund these costs.

Other Services

Other services include several sundry data reporting services which are required to support the Performance Assurance Framework as well as an allowance to fund the centralised administration costs for the single metering code of practice auditor procured in 2022.

The Operations team have been sized to enable the effective management of all the listed services. Our portfolio of services includes significant data processing requirements and, in most cases, RECCo is the data controller in the service contract. Consequently, we have allowed for an appropriate level for data and information security expertise in the financial projections.

	2023/24 Expected £'000	2023/24 Budget £'000	2024/25 Indicative £'000	2025/26 Indicative £'000
Central Switching Service (CSS)	11,000	19,200	21,331	23,699
Code Manager	10,000	10,010	10,713	12,184
Enquiry Services	5,175	6,313	6,731	6,502
Theft Services	2,400	1,004	3,104	3,210
REC Support Costs	600	692	600	600
Other Services	50	246	223	232
TOTAL	29,225	37,465	42,702	46,427

RECCo Operations

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RECCo operational costs include maintaining a fully independent and remunerated Non-Executive Board, infrastructure costs to enable the company to discharge all of its obligations under the REC and Companies Act, successfully manage and mitigate the risks inherent in its outsourced business model, have the capacity to deliver successful change and effectively and efficiently manage all the REC Services.

RECCo has a policy whereby reliance on Subject Matter Experts is minimised and talent and knowledge is developed and retained internally in the organisation.

The maturing nature of our services means we are better informed on the level and nature of resource required to deliver our obligations and manage our services effectively and efficiently. We have sized our operational capability and capacity accordingly.

Over the planning period our operating costs as a percentage of total budget remain broadly static at c.9%.

	2023/24 Expected £'000	2023/24 Budget £'000	2024/25 Indicative £'000	2025/26 Indicative £'000
Board, Staff and Operating Costs	4,150	5,141	5,300	5,802
TOTAL	4,150	5,141	5,300	5,802

For the planning period, RECCo human capital will be structured:

Strategy

The role of the Strategy and Development team is to ensure that the REC remains relevant and continues to evolve in order that both the code content and the associated services provided by RECCo anticipate and then meet the changing needs of REC Parties and wider stakeholders in the energy market.

Transformation

Given the nature, complexity and number of data flows (and contracts) for which RECCo is now and will become responsible as Data Controller or Processor and recognising the extensive and complex GDPR arrangements inherent within the REC, the data management and transformational activities have been consolidated under a dedicated team. This team will deal with increasing data, security and information issues which cannot be economically and effectively outsourced to service providers and as well as delivering dedicated project management and PMO capability.

Operations

The role of the operations department is to ensure that each RECCo service provider is delivering its services in line with REC requirements and/or contractual obligations and to the required quality standards. The resource model we have established will ensure that each service provider/service function has a service manager lead that will be the expert on the service. Resources will be assigned to reflect the scope and quantum for each service. The effectiveness of our operational service delivery management is evidenced by the recovery of in excess of £900k of service credits in 2022 coupled with a strong customer satisfaction result reported through the recent independent stakeholder satisfaction survey.

Finance

The role of the finance and commercial function is to ensure that RECCo's finances are managed in an efficient manner to ensure it has the resources available to meet its financial liabilities and deliver its strategy and projects. The commercial function is required to ensure that RECCo's commercial risk is managed, services are procured competitively

RECCo Operations

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and, working alongside the operational and transformation teams that all services are delivered to their contractual requirements. In the 2022/23 financial year, the finance and commercial team evidenced the delivery of its obligations through our ability to meet all our financial obligations and liabilities as they fell due, the minimisation of bad debt (<£10k), the renegotiation of the GDCC service offering delivering c.£600k of cost reduction and the effective execution of the financial aspects of the Theft Detection Incentive Scheme ensuring >99% of monies due into the scheme were collected and paid out the scheme recipients within 6 weeks.

Corporate Affairs

The corporate affairs function is responsible for leading on RECCo’s stakeholder engagement strategy, communications and marketing, HR, people and culture functions within the business. The HR and people function has been brought in-house which is a more cost-efficient solution for the organisation and will ensure there is a continued focus on developing the employees into a highly capable and performing team. To address RECCo’s desire to proactively consider

the needs and wants of all of its stakeholders whilst building trust and confidence and ensuring buy in for the organisation’s initiatives, stakeholder engagement capacity has been brought into the business. The communications and marketing function ensures that RECCo’s external communications are planned and effective, supported by dedicated internal resource and external agencies for discrete projects.

RECCo’s operational and infrastructure costs reflect the day-to-day operational costs of the company and are predominantly by their nature a necessity to comply with legislation, REC requirements or good business risk management practice e.g., audit fees, insurance, training and development, IT costs. The projections include an allowance for bad debts. While the REC allows for the socialisation of any bad debts, RECCo works to commercial principles in managing its debtors. Our finance system automatically “chase” overdue debts, material value overdue debts are examined individually with the nominated REC Contract Manager and REC v3 was updated to explicitly identify non-payment as a “REC event of default” which can be referred to the Performance Assurance Board. This may lead

to expulsion from the Code. Together these combine to provide commercial incentives for REC Parties to pay their invoices on time and for RECCo financial exposure to be reduced. RECCo secured an undertaking from the Bulb Energy administrators that its costs would be payable as an expense of the Bulb’s Energy Administration scheme thereby protecting RECCo from incurring any bad debt due to the failure of the company.

	2023/24 Expected £'000	2023/24 Budget £'000	2024/25 Indicative £'000	2025/26 Indicative £'000
Board, Staff and Operating Costs	4,150	5,141	5,300	5,802
TOTAL	4,150	5,141	5,300	5,802

Projects and Workstreams

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Our Strategy and Forward Work Plan sets out the detail of our three key programmes for 2023/24, being MHHS, Data and Digitalisation and Theft Reduction initiatives.

Alongside these we expect to deliver a number of further projects. The Data and Transformation team will have responsibility for ensuring a robust project governance structure including delivery of PMO functions. Each programme will have a Senior Responsible Officer who is accountable for ensuring a programme or project meets its objectives, delivers the projected outcomes and realises the required benefits.

Any change to the assumptions included in the strategy will impact the values attributed to each project or workstream. This section does not seek to replicate the detail provided in the strategy document.

As can be seen in Table 4 (seen on the right), the cost of projects for 2023/24 is c.£7.6m and this reflects a material increase on our

original expectation for the year. This c.£5.25m increase can be attributed to three key elements; an increase of c.£2.5m for MHHS, the deferral of c.£1.5m of data and theft projects from 2022/23 into 2023/24 due to capacity and capability constraints as well as a delay in securing access to theft data sets and an allowance of c.£1.0m for industry or BEIS sponsored data initiatives. If the industry data initiatives do not progress, then those costs will not be incurred.

Market-wide Half Hourly Settlement

As noted earlier, the scale and scope and complexity of both REC changes and REC Service changes and obligations which RECCo is now required to deliver in support of the MHHS programme changed significantly in 2022. The revised budget reflects the level of expert resource required to support and deliver our obligations as well as an estimate of the likely consequential impact on REC services, namely the Electricity Enquiry Service and the CSS. Given the complexity of this project and the associated high level of risk, we have included a specific contingency allowance for this project.

	2023/24 Expected £'000	2023/24 Budget £'000	2024/25 Indicative £'000	2025/26 Indicative £'000
MHHS	450	2,854	3,704	2,362
Data Programmes	350	2,075	1,238	1,338
Theft Reduction Budget	350	1,465	675	675
Enquiry Service Procurement	0	467	161	41
Code Manager Procurement	0	248	518	326
REC Policy Initiatives	250	250	250	250
Other Projects	350	225	225	225
MSC Projects	500	0	0	0
TOTAL	2,250	7,584	6,771	5,217

Data Programmes

The full extent of the RECCo role in the guardianship and stewardship of industry data sets within the REC Services and the corresponding impact of GDPR, security and information management has crystalised throughout 2022. The budget allowance includes a number of data workstreams including delivering of centralised consumer consent for the industry, evolution of the roadmap to enabling open data access for RECCo data sets and a continuing commitment to improving data quality. The budget also allows for the procurement of a centralised API Gateway & Microservice Architecture service which will facilitate a more efficient means of

accessing REC Services. Also included is an allowance for the delivery of the BEIS driven Secure Smart Energy System.

Theft Reduction strategy

RECCo is required to develop a Theft Reduction Strategy that will better facilitate the discharge of REC Parties licence obligations to prevent, detect and investigate gas and electricity theft. In 2022 we completed the development of a Theft Estimation Methodology, this provides a robust data-driven basis upon which industry can assess the current scale of energy theft. We engaged with a broad range of stakeholders and a theft workshop identified a number

Projects and Workstreams

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of practical steps that can now be taken to improve the industry’s collective response to energy theft. Central to our programme for 2023/24 will be a focus on taking a whole-of-system approach and facilitating greater collaboration between the entities impacted by theft. The Theft Reduction Strategy will offer a holistic approach to addressing energy theft by highlighting prevention, encouraging better and more proactive response. Informed by learnings from other sectors, the strategy will not just focus on the detection of theft, but also on improving industry parties’ ability to respond effectively. Most importantly, given the risk to safety inherent in all energy theft we will continue to focus heavily on prevention, while recognising that the impacts of this are harder to quantify.

Procurement activities

As highlighted earlier, RECCo is committed to competitive procurement as often and as early as possible for our REC Services where it is economic to do so. For 2023/24 we have allowed for two procurement projects to

establish the first stages of re-procurement of Code Manager and Enquiry Services. We will engage with stakeholders and the market to ensure we identify the most competitive options available and enable us to take advantage of advances in technical and service delivery capabilities.

REC Policy Initiatives and Other projects

Reflects an allowance for a suite of small research driven projects. Detail on the individual areas is set out in the Forward Work Plan and Strategy and each are areas, either currently or likely to be in the future, governed by the REC and directly linked to the REC Objectives. None of these projects are speculative.

	2023/24 Expected £'000	2023/24 Budget £'000	2024/25 Indicative £'000	2025/26 Indicative £'000
MHHS	450	2,854	3,704	2,362
Data Programmes	350	2,075	1,238	1,338
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REC Policy Initiatives	250	250	250	250
Other Projects	350	225	225	225
MSC Projects	500	0	0	0
TOTAL	2,250	7,584	6,771	5,217

Change Allowance and Contingency

Change allowance

The change allowance for 2023/24 has been retained at the expected level. This shows an increase on the allowance included in prior years reflecting the increased financial obligation for CSS costs and the full year impact of the enhanced Enquiry Services from April 2023. The change allowance will be used to fund changes to existing REC Services. All proposed changes are subject to a stage gate scrutiny process whereby the requirement is validated, the service provided proposal is tested to ensure it meets the requirements and will deliver value for money and delivers a positive net benefit. All changes are formalised within contract. As of the end of 2022, there are 52 REC Change Proposals under consideration.

Contingency allowance

RECCo is required to develop its budget on a bottom-up basis. Other than MHHS, we have not included any project or service specific risk premiums in the appropriate budget lines. Therefore, reflecting the inherent instability and uncertainty in the market we have included a contingency allowance of c3.5%.

	2023/24 Expected £'000	2023/24 Budget £'000	2024/25 Indicative £'000	2025/26 Indicative £'000
Change Allowance	4,000	4,000	4,000	4,000
Contingency	2,100	2,000	2,000	2,000
TOTAL	6,100	6,000	6,000	6,000

Thank you

We hope you found this Strategy, Forward Work Plan and associated financial projections useful.

Comments

We invite all comments from any interested parties via email by 3 February 2023 at:

recco_strategy@retailenergycode.co.uk

Webinar

We would be happy to answer any questions you may have at our webinar on 25 January 2023.

[Register](#)



Retail Energy Code Company Ltd,
27 Old Gloucester Street,
London. WC1N 3AX

