recco

Forward Work Plan

2025-28

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CEO *foreword*

Sid Cox
Chief Executive Officer

The retail energy market continues to present challenges and opportunities for industry and consumers. Although wholesale energy prices have fallen from historic highs, in the absence of reform, there continues to be upward pressure on retail prices in the short term driven by the need for investment in energy infrastructure to achieve net zero targets, while some consumers continue to struggle with affordability and mounting energy debt.

Our Forward Work Plan for 2025-28 is informed by RECCo's 2025-2030 Strategy. It sets out the contribution we intend to make and underscores the strides we are taking to strengthen and evolve our governance of the Retail Energy Code (REC), our core services to stakeholders and aligns with regulatory reforms and industry needs.

Ofgem and the Department for Energy Security and Net Zero (DESNZ) have asked RECCo to deliver key initiatives. They are engaging us earlier in policy and programme delivery, which naturally fall under the REC. This brings new opportunities to improve the retail energy market and new responsibilities. Looking ahead, we recognise that the scope of what we are doing next year will not only enhance the current services we provide but also prepare RECCo for new services. As the retail energy sector evolves, so must we as an organisation. Our focus will remain on adapting to this evolving landscape and preparing for and implementing required changes in both governance and service delivery. **We will continue to always take account of the impact on consumers in everything we do, while ensuring that our stakeholders are meaningfully engaged.**

In the past year, we have demonstrated our ability to successfully deliver improvements to our services, including enhancements to the REC Change Process and performance assurance mechanisms and programmes, as well as preparing for the implementation of the Market-wide Half-Hourly Settlement (MHHS). These achievements reflect our ability to meet immediate operational needs and set the foundation for the more ambitious projects ahead, such as the governance and development of an industry-wide Consumer Consent solution. This initiative aligns with our vision to enable a more dynamic and consumer-focused retail energy market.

Looking forward, the introduction of the Code Manager licence regime represents a transformative shift in industry governance. As one of the first entities to undertake this transition, we will build on our experience with Retail Code Consolidation to ensure a seamless adaptation.

Although we were disappointed with Ofgem's decision not to transfer full governance of the Central Registration Service (CRS) to the REC, the consultation process underscored the critical need for performance improvements. We remain steadfast in our commitment to achieving higher service standards and leveraging the existing governance framework to deliver these enhancements,while prioritising security and protecting consumer interests. Of course, our ability to meet these growing expectations and the requirement to meet the obligations of the REC Licence, if awarded by Ofgem, depends on the continued support of our stakeholders. The increasing demands placed upon us will require additional resources to ensure we remain **agile and effective** in delivering our mission. We are committed to transparency in outlining our plans and budgets and welcome your engagement in shaping our path forward.

This year's Forward Work Plan highlights our strategic priorities to **Perform, Protect, and Progress**—principles that guide us in delivering robust code management, safeguarding consumer interests, and fostering innovation in the retail energy market. With your partnership, we can navigate this transitional year and beyond, driving meaningful change for the benefit of consumers and the industry alike.

Executive *Summary*

RECCo has developed its Forward Work Plan for 2025-2028 with a focus on service excellence, regulatory compliance, consumer protection, and support for innovation in the retail energy sector.

This document outlines the initiatives we will undertake to achieve the Strategic Priorities set out in our Strategy.

Strategic Themes and Priorities

RECCo's strategic themes are anchored in three core areas. These represent RECCo's commitment to excellence in code management, safeguarding consumer interests, and facilitating a dynamic and effective retail market.

Perform

Striving to deliver service excellence

Emphasises delivering service excellence, improving digital platforms, and supporting efficient operations.

Protect

Consumer protection and data security

Focuses on consumer data security, energy theft reduction, and regulatory compliance.

Progress

Innovation and market facilitation

Addresses ongoing support for market initiatives, including energy transition and flexibility, by driving innovative solutions.

Key Initiatives

Perform
Striving to deliver service excellence

Continuous Improvement: Taking on board stakeholder feedback, our top priority this year has been striving to deliver service excellence through an action plan of short and medium-term improvements. RECCo aims to enhance the quality of code management services through robust performance management, assessment and continuous improvement initiatives, all informed by effective stakeholder engagement. We will evolve these services to support an agile and responsive code management framework, building on our new Digital Services platform.

Digital Services: As the current Code Manager Service Provider contracts are set to expire in August 2026, we have conducted a thorough service review, with support from a Stakeholder Advisory Group, to guide our future procurement strategy. Improving our Digital Services emerged as the top priority. We are currently competitively procuring a Digital Services partner who will provide a flexible, integrated and user-friendly digital platform to improve stakeholder engagement and operational efficiency.

Code Manager Services: Over the coming year, we will review our services and design requirements. We will set out our approach to reprocuring these services in our next Forward Work Plan.

Systems and technology - Central Registration Service: we remain committed to addressing performance challenges, and achieving measurable improvements in governance, service quality and operational efficiency.

Enquiry Services: We will enhance and optimise service performance and improve security.

Protect
Consumer protection and data security

Energy Theft Reduction: A strategic priority involves equipping energy companies with the tools to detect, prevent, and address energy theft. RECCo plans to collaborate with service providers and policymakers to raise awareness and increase the effectiveness of theft prevention strategies.

Third-Party Intermediary (TPI) Code of Practice: RECCo will, if our Change Proposal is approved by Ofgem, seek to implement a mandatory code of practice for TPIs, ensuring compliance with standards and raising service quality in the non-domestic sector. This initiative addresses growing consumer reliance on TPIs and seeks to protect against potential misconduct in an increasingly complex energy market.

Consumer Consent for Data Sharing: If mandated by Ofgem, following the conclusion of its consultation process, RECCo will lead the development of a secure digital platform enabling consumers to manage consent for third-party access to their energy data. This aligns with regulatory goals to provide consumers with greater control over their information, enhancing transparency and consumer trust.

Progress
Innovation and market facilitation

Market-Wide Half-Hourly Settlement (MHHS): As part of supporting a more dynamic and flexible energy system, RECCo will continue to deliver its contribution in a timely and effective manner to facilitate MHHS, which allows for more accurate settlement processes. Efforts include adapting systems, qualifying stakeholders, and preparing for full implementation post-2026.

Smart Secure Electricity System (SSES) – Tariff Interoperability: If mandated to by DESNZ, RECCo will establish governance and enabling services to support tariff interoperability. This will include developing a REC schedule and technical specifications to guide parties in fulfilling their tariff obligations, which will be subject to performance assurance.

Key Initiatives

Upcoming Regulatory Change

Code Reform and Licence
With Ofgem introducing new licensing requirements for code managers, RECCo is preparing for a transition by 2026. This will involve revising governance processes, engaging stakeholders, and adapting to new oversight mechanisms.

As part of our new obligations as a Code Manager, we may be required to implement transformational changes outlined in a Strategic Direction Statement (SDS). Ofgem's consultation on the first SDS may necessitate adjustments to our change programme before the Code Manager licence becomes effective.

Collaboration on Digital and Flexibility Initiatives
RECCo will collaborate with other organisations, including Elexon and NESO, to support ongoing digitalisation projects and ensure alignment across energy system initiatives, particularly in areas such as data sharing and infrastructure.

Conclusion

RECCo's Forward Work Plan sets a clear path to advancing service quality, consumer protection, and market efficiency. Through careful planning, RECCo aims to address current market needs while proactively adapting to future demands, ensuring a resilient, consumer-focused retail energy market.

Key Deliverables and Timeline

Strategic aims		2025-26	2026-27	2027-28
Perform	Striving to deliver service excellence	**Continuous improvements** across all Code Manager Services		
		Code manager evolution - Digital Services: Design, develop and test new digital service	Implement **new solutions** and transition from existing digital solutions	
		Code manager services: Review and establish re-procurement requirements	Potential re-procurement	
	Systems and technology	**Enquiry services:** Maximise performance and security		
		Switching and CRS governance: Quality and service provision improvements		
	Licence fulfilment	**Code reform and licence:** Engagement, development and preparation	**Code reform and Licence:** Implementation and delivery	
Protect	Mitigate Consumer Harm	**Energy theft reduction**		
		Third party intermediaries: Accreditation & assurance	**Horizon scanning:** New market participants	
	Data	**Consumer consent:** Minimum Viable Product (MVP) scope, design, develop & testing	Launch of MVP, optimisation, and ongoing evaluation	
Progress	Programme Delivery	Market-wide half-hourly settlement		
	Facilitate Innovation	Smart Secure Electricity Systems (SSES)		

About *RECCo*

The Retail Energy Code (REC) and the Retail Energy Code Company (RECCo) plays an important role in transforming our energy industry. We will do this by ensuring effective governance, protecting consumer interests, and supporting the UK government's Net-Zero targets while adapting to a rapidly changing market.

Our Mission & 5 C's

Our five C's represent the outcomes we aim to achieve. They help ensure our focus remains aligned with and true to our mission.

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 consumer outcomes.

Consumer

Working towards the ultimate aim of delivering consumer benefits

Cost

Our services are efficient and cost-effective

Catalyse Improvement

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

Competition

Proactively identifying efficiencies and innovations that will support competition

Climate

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

Our Aims

These aims are not wholly separate or exclusive, they will reinforce each other, and help drive our strategic priorities, our decision making and business planning processes.

RECCo at a Glance

Service Provider Performance

Our service providers delivered exceptional performance throughout the year.* They met c.97% of their Service Level Agreements (SLAs) through the majority of April 2024 until December 2024, with no service failures that resulted in the application of Service Credits.**

Our services have an industry-wide impact. In 2024/25:

- The REC Change Process reached 95 changes implemented
- The Enquiry Services processed 80.9m Online Portal and 392.3m API searches (April - November 24)

97% of Service Level Agreements were met

Key Deliverables

In our 2023/24 Forward Work Plan, we set out a list of outcomes that we wanted to achieve during 2024/25. You can read these in full here. We are pleased to have achieved 90% of these outcomes across our four strategic priorities with two months remaining. We are on track to complete all deliverables by the end of our financial year - March 2025.

Key achievements include:

- The Gas Enquiry Services (GES) re-platform was successfully completed in late October
- Introducing a range of improvements to the REC Change Management Process via Change Request R0167.
- Developed and consulted on an Outline Business Case for a dedicated police unit to tackle energy theft.
- Building an API gateway to improve our enterprise architecture, due to launch in 2025.
- Launching the Detertech Portal as part of the Energy Theft Reduction Programme.

90% of outcomes have been achieved with 2 months remaining

Stakeholder Savings

This year, we expect to save stakeholders approximately £5m. This is through effective management of the change allowance, efficient procurement, deferral of non-urgent projects, billing non-REC parties for service use, recovering service credits, and aligning our recruitment with the business' maturity.

We have accelerated our rebate process to improve Party cash flow, reducing charges for the Market-Wide Half-Hourly Settlement programme by c£1.8m in October 2024 and reducing REC Charges by c£2.5m in January 2025. We will return any remaining underspend when the annual statutory audit is completed.

£5 million saved

RECCo Culture

Over the past 12 months, we are proud to have retained 98% of our workforce. 8 employees reached their two-year milestone, and 13 entered their third year at RECCo – a testament to our strong company culture.

Additionally, in a recent survey, 97% of our employees agreed that RECCo is a diverse and inclusive place to work. This reflects the importance we place on ensuring our employees feel supported, valued, and motivated to bring their best authentic selves to work every day.

97% agree that RECCo is diverse and inclusive

*The Switching service provider did not meet its SLA service levels and earned zero margin on the service.
**Service Credits serve as an incentive for our providers to meet the needs of users while ensuring value for money across the industry.

Perform

We are a trusted expert provider and enabler of code management and services.

Service Excellence

Systems & Technology

Licence Fulfilment

Our People

Service Excellence

Code Manager Services

Consumers Climate Competition Cost Change/Catalyst

Continuous Improvement

We are committed to delivering service excellence through a customer-focused culture within our team and our service providers. We will continue to ensure our services are efficient, effective and meet the standards expected by our users.

Feedback from stakeholders through roadshows, surveys, advisory groups, and individual sessions, along with our performance review, will guide our improvement efforts. Our Service Delivery Managers, supported by the Commercial Team, work closely with primary service providers. To maintain strong oversight and deliver on enhancement plans, we are introducing a training and development scheme to meet expected outcomes and standards.

Code Manager Services

In the coming year, we will work with our service providers to address issues in Code Manager services, metering provisions, and stakeholder engagement while planning for future needs.

We will also focus on ensuring the Gas and Electricity Enquiry Services meet evolving requirements and user demands. Below, we outline our key priorities for each service area.

Change Management

Change Management ensures that modifications to the REC framework are efficiently evaluated, prioritised, and implemented to meet market and regulatory needs. By engaging stakeholders, assessing proposals, and overseeing development, the team maintains the REC's relevance and adaptability. Their work supports innovation, operational efficiency, and alignment with industry goals, ensuring a dynamic and responsive retail energy market.

Last year, after working with our service provider to carry out an end-to-end review and identify issues, we implemented significant improvements to the change management process to bring greater effectiveness and efficiency.

This included:

- **Increasing** the Code Manager resource dedicated to REC Change from 3 FTE to 7 FTE, enabling greater efficiency;
- **Expanding** the pool of subject matter experts available to work on REC Changes; contributing to more effective change management;
- **Introducing** opportunities for stakeholders to feed into the change process with the introduction of the Change Issues Group;
- **Revising** the REC Change process by introducing an 'issues' process and streamlining REC Change documentation; and
- **Upskilling** our Operational Account Managers and the REC Service Desk teams to resolve more issues at the first point of contact.

More broadly, we also re-launched the Codes Roadmap to provide visibility of all activities across the Code Manager Services, and worked with our stakeholders to understand their engagement needs. We now provide monthly communications with key updates.

Planned Activities for the Coming Year

Nevertheless, we are committed to ensuring continuous improvements are made in our services and recognise there is more that can be done to enhance the process. Therefore, we have commenced a pilot initiative to evaluate the effectiveness of the REC Change Process. Over the coming year we will:

1. **Identify Areas for Improvement**
   Use the findings of the pilot initiative to identify and target areas for improvement;
2. **Improve REC Change Reporting**
   For greater visibility so that users can more readily obtain information;
3. **Improve the User Experience**
   Of the REC Portal and Digital Navigator; and
4. **Continue to Work With our Stakeholders**
   Understand and capture their needs, preferences and the outcomes they seek.

Service Excellence

Code Manager Services

Performance Assurance

Performance Assurance ensures that REC Parties comply with their obligations, supporting a fair, efficient, and consumer-focused energy market. Using a risk-based approach, it identifies and addresses high-risk areas, deploying targeted interventions to prevent disruptions or harm.

In addition to monitoring and addressing compliance, Performance Assurance aims to drive continuous improvement in market operations by providing guidance and support to REC Parties. Continuous improvement is driven through audits, reporting, and feedback, with enforcement actions taken as needed to ensure accountability. Performance Assurance also supports innovation by facilitating the adoption of new technologies aligned with REC standards.

Achievements and Enhancements

Last year, several improvements were implemented based on stakeholder feedback. We:

- Clarified the Theft Detection Incentive Scheme (TDIS) and improved the submissions process.
- Streamlined the Performance Assurance Catalogue and introduced escalation processes for missing data.
- Delivered comprehensive training for Operational Account Managers and Service Desk staff to improve first-contact resolution.
- Initiated regular engagement, including check-ins, webinars, and consultations, to align with stakeholders' needs.

Planned Activities for the Coming Year

To build on these improvements, the following activities are planned:

1. **Stakeholder Engagement**
   Consult on the Performance Assurance Operating Plan and leverage the REC Portal for increased engagement.
2. **Market Entry and Assurance**
   Provide tailored training, support for Metering Equipment Managers, and maintain high service standards for new entrants.
3. **Retail Risk Mitigation**
   Focus on Metering Schemes, Market-Wide Half-Hourly Settlement (MHHS) implementation, and refining the TDIS.
4. **Continuous Improvement**
   Enhance the use of assurance techniques and provide data-driven insights to support industry-wide collaboration.

These measures aim to further strengthen REC Performance Assurance, ensuring alignment with its objectives and delivering enhanced outcomes for the energy market and consumers.

Service Excellence

Code Manager Services

Consumers Climate Competition Cost Change/Catalyst

Technical Services - Data Management and Digital Platform

REC Technical Services underpin the effective operation of the retail energy market, providing platforms, tools, and frameworks essential for data exchange, compliance, and user support. These services facilitate seamless collaboration among market participants, enable accurate and efficient operations, and promote accessibility through continuous enhancements in digital tools and resources. REC Technical Services aim to deliver a user-centric digital experience while maintaining compliance and operational efficiency. Through proactive communication, intuitive tools, and stakeholder engagement, these efforts align with the REC's mission to foster an efficient and consumer-focused energy market.

Achievements and Enhancements

Over the past year, based on stakeholder feedback, we made significant improvements, including:

Digital Platform Improvements:

- Added a comprehensive navigation menu and a unified entry point for the REC Portal, Digital REC, and ERIN.
- Refreshed Data Items and Market Message pages for easier searchability.
- Removed redundant Scenario Pages and introduced change proposals to address errors in the REC Data Specification.

Enhanced AI and Search Functionality:

- Launched the Energy Resource Information Network (ERIN), an AI-driven tool, to simplify complex queries and enhance user interaction with REC Digital Services.

Planned Activities for the Coming Year

To build on these enhancements, REC Technical Services will focus on the following priorities:

1. **User Experience Improvements:**
   Enhance the Digital REC and ERIN's capabilities to deliver more intuitive and efficient interactions.

   Improve the Digital Navigator interface and content for seamless navigation across REC schedules.
2. **Proactive Communication:**
   Develop a targeted notification system for updates to the REC Data Specification to ensure stakeholders remain informed in real-time.
3. **Content and Release Management:**
   Review and refine content across the REC Portal to improve clarity and accessibility.

   Align REC Schedules with the latest release management cycles for consistency.
4. **Integration of Digital Services Provider:**
   Engage a Digital Services provider to design and implement tailored solutions, further modernising REC digital infrastructure.

Service Excellence

Code Manager Services

Metering Services

RECCo plays a key role in managing Metering Services, ensuring compliance with the REC's standards and procedures, including the Consolidated Metering Code of Practice (CoMCoP).This work supports accurate metering data recording and communication, integrates new metering technologies, and aligns with the retail energy market's broader objectives. This includes protecting consumers through assuring safe meter installation. By managing these aspects, RECCo enhances the efficiency, transparency, and reliability of Metering Services to deliver positive consumer outcomes.

Planned Activities for the Coming Year

Last year, based on stakeholder feedback, RECCo conducted an end-to-end review of the CoMCoP and introduced a dedicated Metering Services Delivery Manager to improve services. Building on these efforts, RECCo plans to implement the identified CoMCoP improvements and will focus on the following initiatives in the coming year:

1. **Evaluate Metering Audit Services:**
   Strengthen relationships with Service Providers to improve performance by understanding challenges.

2. **Increase Reporting:**
   Enhance reporting on metering activities to identify opportunities for service improvement.

3. **Review Audit Approaches:**
   Assess and improve audit methodologies.

4. **Support REC Portal Enhancements:**
   Focus on improvements related to Metering Services.

5. **Progress MHHS Implementation:**
   Continue support for Market-Wide Half-Hourly Settlement.

6. **Contribute to Net Zero Initiatives:**
   Engage in projects like the Smart Secure Electricity System Programme consultation.

The current metering audit contract will end in April 2026. Over the coming year, we will commence work to review current arrangements and requirements and consider the need to introduce enhancements such as:

- Tailored audits that are entity-specific and more practically relevant.
- Increased confidence in compliance assurance, going beyond desktop reviews to ensure processes are effectively implemented.
- More detailed reporting with broader data points for nuanced improvement opportunities.
- Costs that better reflect the impact of accreditation on relevant parties.

We believe these actions will strengthen Metering Services and support the REC's mission to create a more efficient, economical, and consumer-focused energy market.

Service Excellence

Code Manager Evolution

Consumers Climate Competition Cost Change/Catalyst

Effective and efficient procurement is a cornerstone of our approach to service delivery. We believe that a disaggregation of the services that constitute REC code management allows for the procurement of 'best-in-breed' service providers, removing the need to compromise in any aspect and delivering a partnership that is greater than the sum of its parts.

Contracts for the current service providers are due to end in August 2026. As part of the code manager evolution project we have undertaken a review of the services to inform our future procurement strategy.

Digital Services

Planned Activities for the Coming Year

We sought feedback from stakeholders about the quality of the Code Manager service and identified pain points, root causes and underlying themes for improvement. We prioritised the issues to address and identified that the Digital Services need improvement.

Our vision is to provide and manage a modern, integrated and user-friendly digital environment that simplifies interaction and navigation, promotes engagement and drives efficiency for all users (see page 21 for further information). The REC Portal will be the channel for stakeholders to engage with the digital REC, manage their data and interact with the REC code manager and its processes. Over the coming year, we will:

1. **Create a stakeholder user group** to help guide and inform our work.
2. **Design, develop and test** our new digital solutions through 2025/26.
3. **Plan a soft launch** of the new arrangements, followed by a full go-live in 2026/27.
4. **Establish, embed and operate** new operational services, creating processes for continuous improvement and the development of new solutions to ensure that the needs of our stakeholders are continuously met rather than subject to periodic reviews.

Code Manager Service

Planned Activities for the Coming Year

In relation to our other code manager services, we have taken onboard stakeholder feedback and will avoid the upheaval of a "big bang" approach that would occur by reprocuring all of the code manager services at the same time. We will stagger our reprocurement of these services.

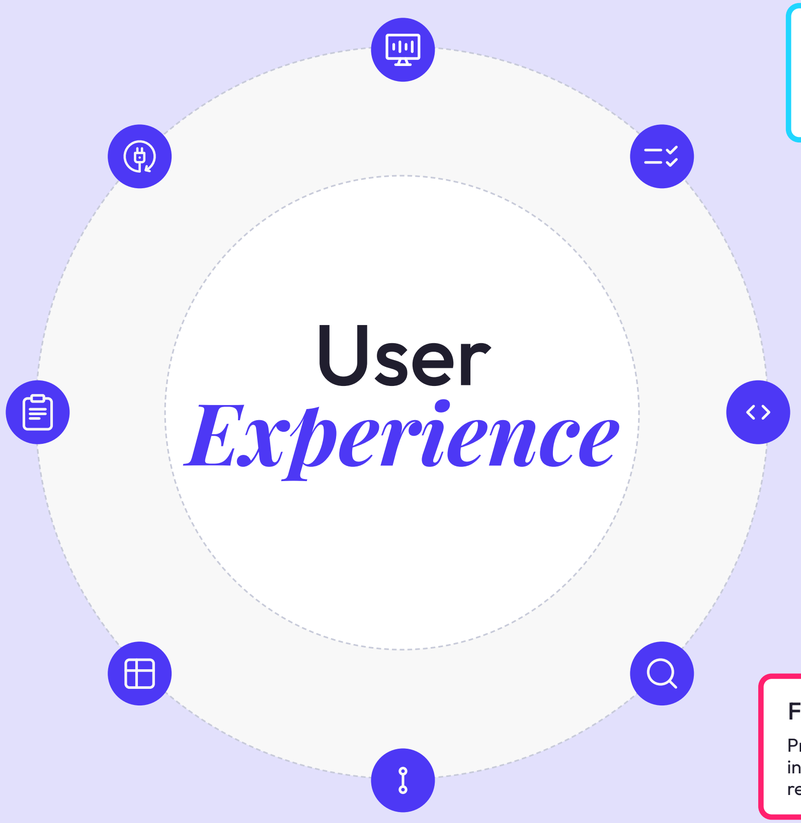
Over the coming year we will:

1. **Undertake a complete review of service performance and effectiveness** to help inform our approach to the future service design and the changes that may be required.
2. **Seek to understand the impact and implications stemming from the current Code Review** and factor these into our thinking and planning, ensuring that we future-proof our arrangements.
3. **Set out our approach to any further extensions of the existing code manager contracts**, assess whether further procurement is required and plan and initiate the processes where appropriate.

Service Excellence

Our Vision for Digital Services

Consumers | Climate | Competition | Cost | Change/Catalyst



Code Management (Change & Service)

Providing a streamlined solution for the handling of the REC Change/Issue and query processes, including consultations.

Party Management

Providing a solution to support streamlined party registration, account interaction(s) and navigation.

Digital Code Master Management, Technical Specs and Interaction

The 'Digital REC' which provides efficient management of digital code documentation, including the repository of Technical Data specs for the industry to follow.

Data Analytics and Reporting

Providing advanced real-time analytics and reporting tools that enable technical and market performance insights to help inform decisions.

AI Search & Assistance

Providing intuitive user searching capabilities, with search requests originating within the portal but spanning across all solutions.

REC Portal (DXP Solution)

This will act as the primary interactive channel through which market participants will engage, enabling a streamlined and user-powered digital ecosystem.

Foundation Technology

Providing robust, modern central infrastructure services which are scalable and reliable. This includes the API Gateway.

Service Excellence

Enquiry Services

Consumers Climate Competition Cost Change/Catalyst

Planned Activities for the Coming Year

We will continue to maximise the performance and management of systems that underpin retail energy industry processes and procedures to drive improvements in data and risk management and bring benefits for users and consumers.

The enquiry services are a core provision of the REC arrangements, enabling REC Parties and non-REC Parties to access essential data for switching and other uses. In the coming year, we will:

1. **Enhance service performance and user experience** through improved data access, user engagement, and feedback-driven improvements.
2. **Advance open data initiatives** by collaborating with service providers to produce reports aligned with open data principles and supporting Market-wide Half-Hourly Settlement.
3. **Optimise service delivery by monitoring usage**, addressing increased demand, improving third-party access, and resolving discrepancies between electricity and gas enquiry services.
4. **Strengthen security measures** to prevent, manage, and respond to evolving risks, ensuring effective incident management and minimising risks to REC and other authorised parties.

Activities for 2026/27 and Beyond

It is important to balance the benefits of periodic competitive procurement against the need for stability and certainty to encourage investment. We have issued a Request for Proposal (RFP) to our enquiry service providers with the option to extend the contract for two years and consider service delivery post-2027. The RFP includes a number of technical, contractual, change and service management improvements to drive improvements to the Enquiry Services for years to come.

Systems & Technology

Central Registration Service Governance

Consumers Climate Competition Cost Change/Catalyst

We acknowledge Ofgem's decision to retain responsibility for the Centralised Registration Service (CRS) under the Data Communications Company (DCC). While the proposed transfer of the CRS to the RECCo will not proceed at this time, we remain committed to delivering the benefits we originally envisioned through collaboration with DCC and Ofgem.

Planned Activities for the Coming Year

We will build on our work to strengthen the governance and improve the quality of the switching services in accordance with the REC.

Commitment to Enhancing CRS Performance

In line with stakeholder feedback and Ofgem's outlined priorities, RECCo will focus on addressing performance challenges and achieving measurable improvements in CRS governance, service quality, and operational efficiency. Key areas of focus include:

1. **Governance and Operational Model Review**
   Conduct a review of current governance arrangements to identify necessary changes that strengthen the ability of RECCo and the REC Performance Assurance Board (PAB) to hold DCC accountable. Explore mechanisms to achieve the benefits of a transfer without necessitating structural changes to DCC's licence or SEC security requirements.
2. **Address Quality Improvements**
   Develop and implement an Address Quality Plan (AQP) to systematically enhance address data accuracy, reducing erroneous switches and improving consumer outcomes.
3. **Stakeholder Engagement and Reporting**
   Refine reporting frameworks and knowledge repositories to ensure clarity and accessibility for stakeholders. Implement a robust Communications and Engagement Strategy to keep stakeholders informed and engaged throughout service improvement initiatives.
4. **Technical and Process Enhancements**
   Collaborate with DCC to optimise technical processes, including incident management, security architecture, and service delivery models. Work to ensure alignment of technical and operational activities with REC standards.
5. **Ongoing Collaboration with DCC**
   Strengthen collaborative working relationships with DCC to address current operational challenges and ensure continuous service improvements and efficiencies. Facilitate joint workshops and initiatives to streamline change management and enhance cross-code working.

Activities for 2026/27 and Beyond

In light of Ofgem's decision and the upcoming re-procurement of the DCC licence, RECCo will undertake the following activities to safeguard the delivery of CRS services:

1. **Proactive Stakeholder Engagement**
   Engage actively in Ofgem's consultations regarding the future of the CRS and DCC governance to represent industry and consumer interests effectively. Continue initiatives like the Switching Advisory Forum to gather insights from industry stakeholders.
2. **Strengthen Governance and Oversight**
   Assess and enhance current governance arrangements to ensure they are robust and capable of effectively overseeing CRS operations under the REC framework. Develop comprehensive performance metrics and monitoring systems.
3. **Foster Collaborative Relationships**
   Continue to strengthen working relationships with DCC to align on service delivery expectations and strategic objectives. Coordinate with Ofgem to stay informed about regulatory changes.
4. **Focus on Continuous Improvement**
   Pursue initiatives aimed at improving data quality, refining technical processes, and enhancing stakeholder engagement. Leverage insights from stakeholders to drive continuous improvements.

Licence Fulfilment

Code Reform and Code Manager Licence

Consumers Climate Competition Cost Change/Catalyst

Ofgem has confirmed that the REC and the Balancing and Settlement Code (BSC) will be in the first phase of codes transitioning to the new code manager licence arrangements. We anticipate that this will take place in Q1 of 2026.

Planned Activities for the Coming Year

To become the licenced code manager and ensure a smooth transition, we will work with Ofgem, DESNZ, and stakeholders to facilitate code governance reform and to ensure effective implementation. Over the coming year, we will focus on the following key areas:

1. **Licensing**
   The Energy Act 2023 embodies the Government's ambitions to transform the energy industry so that it may better facilitate the UK's move to Net Zero and increase energy security. The Act includes new powers and responsibilities for Ofgem and a new licensing regime for code managers who will take on greater responsibilities for the governance of codes, including making code decisions and recommendations to Ofgem.

   The first step will be the code managers' selection process. We will engage fully with Ofgem and DESNZ in the selection process with a view to becoming the Licenced Code Manager for the REC.

2. **Strategic Direction Statement**
   Ofgem's Strategic Direction Statement (SDS), which sets out the code changes required to deliver its vision for the energy market, is the first of its kind. The SDS is expected to be published in the first quarter of 2025/26. Whilst the licence designation process will not yet have concluded, RECCo will be expected to ensure compliance with the SDS.

   We will fully engage in this process and work with stakeholders to create a development plan outlining how we will meet SDS requirements.

3. **Decision Making and Stakeholder Engagement**
   Following the implementation of code reform, code managers will be responsible for making decisions or recommendations to Ofgem. Stakeholder input will be essential to that decision-making process, and Ofgem has provided some initial decisions on the role of the Stakeholder Advisory Forum (SAF). The SAF will be comprised of code party representatives acting impartially and independent experts.

   We will work with Ofgem to understand the proposed composition and remit of the SAF and seek views from stakeholders.

4. **Performance Measures**
   Ofgem and DESNZ have concluded that all code managers will have non-financial performance incentives primarily associated with published performance measures. Ofgem has yet to determine whether it or the code manager will develop the initial set of performance measures.

   In order to meet this requirement, we will work with Ofgem and stakeholders to develop our own set of stretching, outcome-based performance measures.

5. **Wider Code Reform**
   The REC was implemented with an eye to the future and the direction of travel for future code management. Therefore, we believe that code reform changes are likely to be smaller for REC than for other codes, and we wholly support the decision for the REC to be included in the first phase.

   We also see great value and efficiencies for users and consumers in creating consistency across the codes. There are a number of further consultations and decisions that Ofgem and DESNZ will issue in the coming months that will provide further detail and clarity on the new arrangements. These will be key to understanding what we need to do to fulfil our licence obligations.

   We will seek to understand the requirements of wider code reform and their impacts on the REC and RECCo, establishing a programme to deliver the requirements necessary to become a licenced entity.

Perform

Our People - Central to Our Collective Success

Consumers Climate Competition Cost Change/Catalyst

At RECCo, our people are the driving force behind our achievements. The quality of the REC services and our ability to deliver on our mission depends on our team's skills, dedication, and collaboration, whilst working closely with stakeholders.

By creating a culture where individuals can be themselves, support and learn from one another, and genuinely enjoy their work, we believe we will create the environment necessary to deliver on our commitments to the highest standards—aligned with the needs and priorities of our stakeholder community and end -consumers.

The feedback received through our 2024 employee engagement survey was overwhelmingly positive, with employees highlighting our open and supportive culture as one of the key reasons they enjoy working at RECCo. This feedback confirms that fostering strong, positive relationships between colleagues is central to our success—and it's something we are committed to building on in the years ahead, noting that we continue to operate as a remote-first organisation. As we look to 2025-26, our focus will remain on ensuring our people feel empowered to perform at their best. By investing in a culture that prioritises well-being, professional growth, and collaboration, we will build the capacity and capability needed to continue delivering the high-quality expanded services we strive for and that stakeholders require in an ever-evolving retail energy market.

Valuing Our People

We are committed to building a team of experts who are passionate about our mission and delivering valuable change to our stakeholder community.

This culture, rooted in being consumer-centric and mission-driven, has attracted talented individuals from across the sector, and fostered an environment where people want to stay and grow – evidenced by our excellent retention rate.

As our responsibilities expand with the evolving nature of the retail energy market, we must continue to nurture, upskill and retain the excellent talent we have. In 2025-26, we will prioritise retention, ensuring that our people continue to be engaged, developed, and provided with opportunities to grow within RECCo.

Our Four Key People Priorities:

1. **Capability and Capacity**
   As we prepare for the anticipated REC Code Manager licence, Consumer Consent and SSES programmes, we recognise that we need to be appropriately resourced to ensure successful delivery of these additional workstreams. Our analysis means that we will require an additional 24 roles if all of this new work is confirmed. We will undertake recruitment to meet the needs of the business, ensuring we recruit the right skill set and provide value for money.

2. **Employee Development**
   We are committed to providing employees with opportunities for continuous learning and development. We will evolve our development programmes across the RECCo team to enhance skills, knowledge, and career prospects, ensuring our employees have the tools and understanding to thrive.

3. **Cultivating Well-being**
   We will continue to introduce new initiatives that support mental, emotional, and physical health, driven by the results of our employee engagement surveys. Our goal is to foster a workplace that remains supportive and empowering—where every individual feels valued and can flourish, both personally and professionally.

4. **Attracting and Retaining Talented People**
   Attracting and retaining our talent is key to our ongoing success. Our strategy includes being a remote working organisation, providing competitive compensation and development opportunities, and creating a work environment where people feel valued, respected, and empowered to overcome any challenges they face.

Protect

We safeguard consumers' interests and data by providing secure Digital Services tailored for the retail energy market.

- *System Security*
- *Open data*
- *Performance Assurance*
- *Mitigate Consumer Harms*

Mitigate Consumer Harms

Energy Theft Reduction

Consumers Climate Competition Cost Change/Catalyst

Planned Activities for the Coming Year

Our Energy Theft Reduction Strategy continues to evolve, delivering innovative tools, insights, and services that empower REC Parties to effectively **prevent, detect, and respond** to energy theft. This initiative not only addresses a critical issue in the energy market but also reduces consumer harm and enhances market efficiency.

In 2022 we commissioned what we believe to be the first independent and industry-wide review of theft for around ten years. Adjusted to current retail prices, we found that the volume of energy theft in the UK is costing consumers **£457 - £760 million per year.**

We will continue to provide a whole system approach to theft reduction, focusing on prevention, detection, and improving the efficacy of industry's response and ability to disrupt further theft.

We will continue to focus on these four key objectives by pursuing work in the following areas:

1. **Awareness**
   We will continue to build upon the success of the **Stay Energy Safe campaign** and our partnership with **Crimestoppers** to raise public awareness of the dangers of energy theft. Recent efforts have focused on highlighting the role of rogue landlords and countering misinformation, ensuring that vulnerable consumers are better informed and protected.

2. **Incentives**
   We have collaborated with the Code Manager and REC Parties on REC Change Proposals to enhance incentives for investigating, detecting, and reporting theft. REC Change R0163, set to take effect on 1st April 2025, will, for the first time, reward investigative activity rather than just outcomes, providing suppliers with greater certainty of reward and encouraging broader participation.

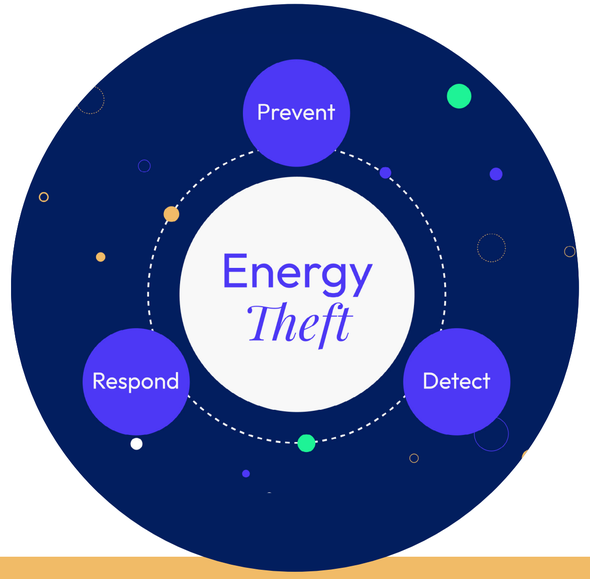
   We have also mandated that leads from the Crimestoppers tip-off service are followed up and reported appropriately, with a corresponding incentive payment. This has improved investigation success rates and feedback for enhancing theft-related activities.

   Insights from the performance assurance dashboard will allow us to monitor and report on the impact of these changes throughout the year. Additionally, we are developing a claims process to remove disincentives for suppliers to undertake complex and costly investigations, to be consulted upon in early 2025/26.

3. **Data and Insights**
   We are conducting a proof-of-concept to leveraging real-time data for theft detection, with results expected to be published in the Spring to inform a potential business case for scaling up the trial and initiating changes to industry governance. Such data insights could also help reduce network losses, a key focus of the ED3 price control starting April 2028. We plan to engage more with Distribution Network Parties to explore broader contributions to loss reduction.

   Additionally, we are trialling a **Theft Data Portal** to enhance data sharing and collaborative insights. We will consult on its usage and consider extending the service based on findings.

4. **Enforcement**
   In December we consulted on an Outline Business Case to establish and fund a dedicated police Energy Theft Unit. We are pleased with the level of support that this proposal attracted and will now continue to develop the proposal, and subject to acceptance of the necessary REC change proposal, to work with City of London Police to mobilise the unit and a supporting Referral Assessment Service in the second half of 2025/26.



Mitigate Consumer Harms

Third Party Intermediary Accreditation and Assurance

Consumers Climate Competition Cost Change/Catalyst

Planned Activities for the Coming Year

TPIs play an increasingly important role in the GB energy market, supporting customers' participation in what can sometimes be a complex market.

As the UK transitions to a smarter, more digital energy system, new, innovative, and potentially complex TPI models are emerging. However, some TPIs are not providing optimal services to consumers.

We introduced a Code of Practice ('CoP') that holds TPIs accountable to Best Practice Principles. This CoP was launched as a voluntary scheme in October 2023. We subsequently raised Change Proposal R0137 (Introducing Third Party Intermediary (energy broker) assurance and accreditation - REC Portal) to transition this to a mandatory scheme, requiring non-domestic suppliers to only work with accredited TPIs. In addition to the obligation placed on non-domestic suppliers, R0137 will also introduce a new REC service to undertake the accreditation of TPIs.

The solution will set out the minimum standards (proportionate and linked directly to evidenced areas of consumer harm) that TPIs will have to meet and demonstrate compliance with the TPI CoP. These requirements will be introduced through a new REC Schedule, which will incorporate the TPI CoP.

In September, the Department for Energy Security and Net Zero (DESNZ) published a consultation seeking views on the options for regulating Third-Party Intermediaries in the retail energy market to increase consumer protections, building on their 2021 call for evidence. We understand that the proposal to regulate TPIs raises questions about existing codes of practice, including our proposal to require non-domestic suppliers to work only with TPIs adhering to the TPI Code of Practice. To improve standards in the non-domestic market and build consumer confidence, we have reviewed the options and, given the uncertainty around new regulation, believe it is appropriate to proceed with R0137 and submit it to Ofgem for approval.

Secure Openness

Consumer Consent

Consumers Climate Competition Cost Change/Catalyst

Planned Activities for the Coming Year

In its consultation published last September, Ofgem proposed RECCo as the Governance and Delivery Body for Consumer Consent, meaning that we would be responsible for developing, implementing and maintaining the solution. The Consumer Consent project will be integral to ensuring that consumers benefit from the transition to Net Zero, by providing them with greater control over the way that their energy data is accessed and used.

Our Data & Digitalisation Strategy enables us to support the delivery of wider energy market initiatives, such as the transition to Net Zero, while ensuring that consumers remain at the heart of the process. As part of the Strategy, we said that we would support progress towards the establishment of a consumer consent mechanism for energy data, recognising the benefits that this would bring in encouraging innovation and enhancing consumer engagement.

Ofgem's consultation set out a high-level timeframe for delivery, which was aimed at the launch of the Minimum Viable Product (MVP) in 2026. This will make smart meter consumption data available through the solution. RECCo, if mandated by Ofgem, as the Delivery Body will then be expected to expand the scope of the solution so that it is soon able to incorporate other types of data that are also accessible through consent, such as time of use tariff data, energy smart appliance data, and credit data.

Consumer Consent is one of a number of digitalisation initiatives being progressed in the sector; others include the Smart Secure Energy System, Flexibility Market Asset Registration and Data Sharing Infrastructure programmes. We have already engaged with organisations, such as NESO and Elexon, who are likely to have roles in the delivery of these programmes and will continue to do so over the next year. This will help to ensure that the programmes are aligned and that learnings are shared.

Data protection and information security are fundamental to consumer consent. RECCo is committed to strengthening its capabilities and expanding its capacity in these areas to align with its new responsibilities.

We will develop a solution that works for all types of users, including those unable to make use of digital platforms. An important element of the Consumer Consent project – as we set out in our response to Ofgem's consultation last year – is that it will not be exclusively led by industry and will from the outset involve significant engagement with consumers. We have set out below the specific activities that this will involve during the design phase.

Also key to our approach will be to utilise REC governance processes so that the solution is developed transparently, with opportunities for frequent engagement and input by stakeholders.

The year 1 delivery for the Consumer Consent System focuses on establishing a foundational framework to enable energy consumers to share their data securely with trusted third parties. During this initial phase, several key activities are planned:

1. **Scoping and Design**
   We will utilise the REC Change Process to define the scope of the project and lay out the design for the system, emphasising principles such as simplicity, transparency, and security. Ensuring we have an engagement strategy to gather input and to give industry and stakeholders more widely the opportunity to engage with these proposals and to influence the design.
2. **Start Minimum Viable Product (MVP) - development & user testing**
   The MVP will be developed over six months in an iterative way, ensuring the basic features, such as granting and managing consent, are functional. This will include integration with data sources, and compliance with GDPR regulations. The system will undergo testing with a focus group of users to gather feedback and energy retailers to enable data exchanges. This phase will focus on refining the user interface and improving system security based on feedback.

Open Data

Consumer Consent

Consumers Climate Competition Cost Change/Catalyst

Activities for 2026/27 and Beyond

The year 2 delivery for Consumer Consent will focus on the delivery of the MVP scope and refinement based on user feedback.

01

Launch of MVP

The MVP will be rolled out, allowing consumers to start managing their energy data consents through a user-friendly interface.

02

MVP Optimisation

Based on Year 1 and Year 2 feedback, refine the MVP with improved performance, security, and expanded data sources like electric vehicles and renewable energy.

03

Ongoing Evolution

The system will evolve with continuous user feedback, enhancing the MVP for better engagement and wider adoption.

Progress

We drive solutions and facilitate innovations that ensure an effective retail market for today and the future

Facilitate Innovation

Risk Management

Programme Delivery

Horizon Scanning

Programme Delivery

Market-Wide Half-Hourly Settlement

Consumers Climate Competition Cost Change/Catalyst

Working closely with the MHHS programme and Elexon, we continue our work to prepare the retail market arrangements for the transition to, and the subsequent complementary operation with, the new electricity settlement arrangements.

Market-wide half-hourly settlement (MHHS) is a major contributor to the transition of a smarter, more flexible energy system. The benefits are widely recognised to include not only more accurate and timely settlement but the basis for which new incentives, such as time-of-use tariffs and flexibility services, can be built. Our work will deliver the required changes to the REC, its services, including testing and readiness for go live.

Planned Activities for the Coming Year

Whilst the Programme delivered key milestones, it recognised that Systems Integration Testing (SIT) did not align with the expectations of the test execution model. Consequently, the SIT activities required replan resulting in an additional 6.5 months on the original timetable to complete and will in turn have a direct impact the REC deliverables.

RECCo will be continuing to focus on four core workstreams and ensure that the impacts of the SIT replanning are assessed and our deliverables align with the Programme:

1. **Testing**
   The Testing requirements and cycles will continue to form a significant part of the work required to deliver MHHS. We will ensure REC Services successfully participate in the replanned SIT to ensure readiness for MHHS Go-Live.
2. **Qualification**
   Obligations under the REC and the BSC require REC Parties to become 'MHHS Qualified' to assure they have made and tested the necessary changes for each required Market Role. We will continue plan and deliver the qualification requirements for each market role to ensure qualification of REC Parties for MHHS.
3. **Implementation**
   We will focus our resource on the implementation of changes to the REC for MHHS.
4. **Operational Readiness**
   We will ensure that we, our Code Manager Services and other REC Service Providers are prepared to operate under MHHS. In addition, we will be planning for post-MHHS migration changes to the REC.

Activities for 2026/27 and Beyond

We will ensure the implementation of post-MHHS changes to the REC. Beyond these core deliveries, will have an eye to future requirements of the programme and will consider what, if any, developments may be required.

Facilitate Innovation

Smart Secure Electricity Systems

Consumers Climate Competition Cost Change/Catalyst

We will begin the development of the governance required for tariff data interoperability under the Smart Secure Electricity Systems Programme.

The SSES programme, launched by DESNZ, is designed to create the technical and regulatory frameworks to enable untapped flexibility from small-scale devices, such as domestic electric vehicle charge points and heat pumps. As part of this programme, energy suppliers will be required to adhere to a tariff data standard so that energy smart appliances (ESA) can easily receive and respond to tariff information from different energy suppliers.

This standard will be designed with the end consumer in mind, to deliver B2B services for the industry that will have positive outcomes for consumers. The governance will be delivered in a phased way: an initial standard specification for simpler data items based on a Minimum Viable Product (MVP), targeted for delivery in 2026, and then the subsequent development of this MVP to facilitate more complex use cases. If designated by DESNZ via its powers under the Energy Act, the REC will assume responsibility for hosting the enduring governance of the Tariff Data Interoperability standard. It will therefore be through REC governance processes that the MVP evolves to cover more complex tariffs.

Planned Activities for the Coming Year

The year 1 delivery plan for tariff interoperability within the SSES Programme will focus on these key areas:

1. **Initial Technical Framework**
   Form industry working groups through the REC Change Process to develop an MVP for the tariff data standard, enabling tariff information to be communicated to ESAs via a supplier-wide API in a machine-readable, interoperable format.
2. **Stakeholder Engagement**
   Collaborate with energy suppliers, ESA manufacturers, and service providers to finalize the MVP, ensuring seamless communication between ESAs and various suppliers' tariffs, promoting flexibility and optimisation.
3. **Pilot and Testing**
   Conduct trials with energy suppliers and third-party providers to test the MVP API, identifying technical challenges and ensuring compatibility with smart appliances.
4. **Performance Assurance**
   Establish performance monitoring to ensure standards are met and that data interoperability functions as intended, safeguarding system reliability and consumer protection.
5. **REC Schedule Development**
   Collaborate with DESNZ to begin drafting the governance and compliance frameworks that will ensure ongoing oversight of tariff data interoperability and alignment with REC standards.
6. **Collaboration with Consumer Consent**
   Establish data security and consumer protection, working collaboratively with the Consumer Consent workstream to ensure that sensitive tariff data is handled securely, safeguarding consumer interests.

This plan supports flexibility, decarbonisation, and cost savings across the energy sector.

Activities for 2026/27 and Beyond

During year one, RECCo will continue to engage with DESNZ to develop the enduring governance for Demand Side Response Service Provide (DSRSP) and Load Controller licences. Where appropriate and applicable this may lead to changes to the REC and existing services, in years two and three, to enable licence obligations to be discharged.

No budget estimations have been made as RECCo is not the minded to body for these activities currently. Should DESNZ mandate RECCo to deliver any of these services, then contingency will be utilised. However, any funding more than contingency would need to be delivered through cost reductions, change investment, project reductions or potentially reopening of the budget.

Risk Management - Discovery Phase

Orderly Transition

Consumers Climate Competition Cost Change/Catalyst

While the energy industry strives to achieve full smart meter rollout, many consumers still rely on legacy metering systems due to personal choice, technical issues, or practical limitations. With the discontinuation of certain meter types, the availability of recycled units, spare parts, and other equipment is becoming scarce, leading to higher service costs. In the short term, policies such as the default tariff cap may shield suppliers and consumers from rising metering costs. However, legacy metering services may soon become economically unviable.

Issues such as the limited availability of Generic Ironbridge Service Tool (GIST) cards—essential for servicing pre-payment meters—have highlighted these challenges. Although interventions like the Meter Provider of Last Resort (MPOLR) can temporarily extend certain services, they are time-limited. Without careful planning and management, we are concerned that consumers dependent on legacy systems may be detrimentally impacted.

To address this, we propose collaborating with REC Parties and stakeholders to conduct scenario planning and assess the potential need for legacy metering support, including equipment, infrastructure, and trained staff. Such efforts aim to safeguard consumers reliant on legacy systems and ensure a smooth transition to smart meters for the entire population.

Vulnerable Consumers

Insights for Consumer Support

Consumers Climate Competition Cost Change/Catalyst

Over the past year we have explored ways in which the Priority Service Register could be improved. That work is now being led by Ofgem with government oversight, as development of the Share Once Support Register (SOSR). The new register is expected to improve the registration process for support services across multiple utilities and better address the needs of vulnerable consumers.

This work may provide a catalyst to improve the support available to households reliant on medical equipment. In 2023, we highlighted inconsistencies in NHS electricity cost rebate schemes for users of oxygen concentrators and dialysis machines, suggesting reforms such as an independent, bill-administered support mechanism. Establishing an effective cost support system would also address policy concerns around retail market reforms affecting medical equipment users.

In the coming year, we plan to engage with disability charities, healthcare agencies, and the energy industry to refine our proposals and explore how data initiatives, including the consumer consent mechanism could align with the SOSR to enhance support for medical equipment users.

Risk Management

Consumers Climate Competition Cost Change/Catalyst

Reconciliation Operation

RECCo has experience of undertaking the reconciliation of supplier costs in three discrete areas: the Market Stabilisation Charge (MSC); Pre-Payment Levelisation (PML); and the Theft Detection Incentive Scheme (TDIS). We propose to explore how we could build upon these capabilities and seek to use them to further improve market and/or consumer outcomes.

The progress of these initiatives will be dependent on government policy and RECCo will not commence work to develop any solutions at this stage. Where we believe there is merit in progressing this workstream, it would be detailed as part of the Forward Work Plan 2026/29.

Warm Homes Discount

The Warm Homes Discount (WHD) was established in 2011 and the discount is usually applied automatically by suppliers to the electricity bills of eligible customers. Customers who are eligible for these Core Group Rebates are not necessarily distributed evenly in proportion to suppliers' market shares as, for example, the socio-economic composition of each supplier's customer base will vary. In order to balance fairly the cost of delivery across all participating suppliers, a reconciliation mechanism is in place. Since Scheme Year 7 (2017/18) this has been operated by Ofgem.

We do not intend to proactively seek change to the WHD arrangement, but if the government again consults on options as to how the scheme could be administered and by whom, we believe this is an option that RECCo should explore. There may be cost efficiencies and synergies in combining more than one reconciliation scheme, for instance within the invoicing and credit control and in data sharing. This could for instance, better facilitate ensuring that energy consumers are receiving all the support to which they are entitled.

Energy Efficiency

Consumers Climate Competition Cost Change/Catalyst

Supporting the National Warm Homes Plan

The Government's Warm Homes Plan targets energy efficiency upgrades for five million homes in England and Wales. A key focus is on improving private rented sector properties, requiring them to meet a minimum Energy Performance Certificate (EPC) rating of C by 2030.

At present, three data sets are of particular importance to organisations delivering energy efficiency schemes:

- Unique Property Reference Number (UPRN) – identifiers for every address in GB.
- EPCs – the most used and most comparable source of estimated energy efficiency in GB;
- Residential housing condition surveys – the standard benchmarks for energy efficiency as they give the highest granularity of cross-verified information;

Industry, public bodies, and academics stress the need to bridge data silos for more meaningful insights. Linking data in Enquiry Services, which includes the UPRN, with EPC data could significantly aid in delivering such programmes. We therefore propose to explore and understand, what, if any action RECCo can undertake to support the key elements of the Government's Warm Homes Plan, for example, proactively engaging with potential users to develop use cases in line with our Open Data Strategy. We will report our progress and identified options over the coming year. Where we believe there is merit in progressing this workstreams, it would be detailed as part of the Forward Work Plan 2026/29.

Horizon Scanning – Watching Brief

Flexibility

Consumers Climate Competition Cost Change/Catalyst

New Market Participants

As the energy landscape changes, so too will the actors who interact with consumers. Achieving Net Zero requires engaging and empowering consumers to adopt low-carbon technologies like solar panels and electric vehicles and to become more flexible in their energy use. Consumers will have more sophisticated relationships with energy suppliers and potential new market entrants, with a move to energy as a service, but may not want to take on the task of managing those arrangements.

Time-of-use tariffs, expanded use of smart meter data, smart appliances, and Market-wide Half Hourly Settlement will drive innovation and enhance services for consumers. These developments will enable a growing range of initiatives and incentives, encouraging consumers to interact not just with energy suppliers but also with manufacturers, installers, and managers of smart appliances. This ecosystem will support more tailored and efficient energy management solutions.

We see the potential for new market entrants in the domestic energy market who will bridge the gap between suppliers of technologies and energy and the consumer. Whilst some of these may be governed or regulated roles, via technical or qualification requirements, others will remain outside any formal regulation.

We will monitor developments and seek to understand how the REC can, where appropriate, evolve to provide appropriate standards to protect consumer interests around the activities and processes associated with those new products and services and work effectively with those who provide them. Where we believe there is merit in progressing this workstreams, it would be detailed as part of future Forward Work Plans.

Horizon Scanning – Longer-term

Energy Systems

Consumers Climate Competition Cost Change/Catalyst

We are monitoring several regulatory and policy issues that may impact the REC or retail arrangements, dedicating limited resources until further clarity emerges. These include:

- **Heat Networks**
- **Electric Vehicle Charging**
- **Electrification**

Heat Networks

We will engage with DESNZ and Ofgem's consultations on consumer protection for heat network customers if implications for the REC arise.

Electric Vehicle Charging

EV charging developments may affect energy theft, particularly with remote points of abstraction, and will remain an area of interest.

Electrification

Policy changes rebalancing costs between electricity and gas could have significant distributional impacts and affect low-carbon technology adoption incentives.

We hope you found our **Forward Work Plan (2025-28)** informative.

Our **Budget (2025-26)**, agreed on 5 March 2025, can be found here.

For further information, contact: recco_strategy@retailenergycode.co.uk

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

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Energy Code Company Ltd Reg. No. 10989875