

By email only: digitalisation@ofgem.gov.uk

10 September 2026

RECCo response to: Proposed Code Manager Standard Licence Modifications relating to Data Best Practice

We welcome the opportunity to respond to this consultation. Our non-confidential response represents the views of the Retail Energy Code Company Ltd (RECCo). RECCo is the not-for-profit corporate body responsible for the proper, effective and efficient implementation and ongoing management of the Retail Energy Code (REC). We seek to promote trust, innovation and competition while maintaining a clear focus on positive consumer outcomes.

We respond as the current operator and Code Manager of the REC. RECCo is participating in Ofgem's licensing process and expects to be licensed as the REC Code Manager before the end of 2026. We also expect to act as Code Manager for the future Electricity Commercial Code (ECC). The proposed standard licence condition is therefore directly relevant to both our established REC responsibilities and the wider data and digitalisation arrangements we are developing for the ECC.

We support Ofgem's proposal to place Data Best Practice (DBP) and Digitalisation Strategy and Action Plan (DSAP) requirements directly in the Code Manager Standard Licence Conditions. This is the targeted licence route RECCo previously advocated. We already have a Data and Digitalisation Strategy; have embedded DBP concepts in REC Schedule 12 (Data Access); and have developed foundations including a metadata catalogue, data-quality framework, Open Data and Consumer Consents work. The final framework should build on these arrangements and be implemented proportionately, with clear scope and strong protections for personal, commercially sensitive and security-relevant data.

Our detailed responses to the consultation questions are appended to this letter. We highlight the following key points:

- We support SLC 33 as a clear and appropriately targeted home for DBP and DSAP obligations, including the best-endeavours standard for applying DBP Guidance.
- Implementation should recognise existing strategies, plans and Code-based controls, with proportionate transitional arrangements and no unnecessary duplication.
- We would welcome clearer scope and definitions, aligned with related work on Open Data Triage and the emerging Data Domain Coordinator framework. This should include the initial domain-definition exercise and clarification of the respective responsibilities of Code Managers, Data Domain Coordinators, Data Custodians or data holders, and service providers, recognising that an organisation may perform more than one of these roles.

We are happy to discuss any of the points raised in this response.

Yours sincerely,

Jon Dixon
Director, Strategy and Development

Appendix: RECCo response to consultation questions

Q1: Do you agree with the structure of our proposed amendments to the Code Manager Standard Licence Conditions, to introduce the requirement to follow Data Best Practice (DBP) Guidance for licensed Code Managers?

Yes. We agree with the proposed structure. A dedicated Code Manager licence condition is a clearer and more targeted route than placing indirect obligations on Code Parties. This is in line with the position RECCo set out in our August 2025 response to the consultation on DBP as a code obligation.¹

We support the requirement for a Digitalisation Strategy and Action Plan, compliance with the associated DSAP Guidance, and the use of best endeavours to act in accordance with DBP Guidance when undertaking work involving Energy System Data. This recognises that Code Managers can influence and govern data but may not originate or control every relevant dataset.

However, we recommend the following targeted clarifications before the condition is finalised:

- Align the operative language. Paragraph 2.2(e) of the consultation refers to “*take account of*” of DBP Guidance, while the proposed SLC 33.1(e) requires the licensee to “*follow*” the guidance, and SLC 33.13 applies a “*best endeavours*” standard. These formulations are capable of implying materially different standards of adherence. We understand SLC 33.13 to contain the intended substantive obligation and recommend that the consultation, explanatory material and SLC 33.1(e) use consistent language so that the applicable standard is clear.
- Test whether the single, authoritative definition of Energy System Data works appropriately for all classes of licensee to which it will apply, including Code Managers, rather than assuming that a definition developed principally for network licensees translates without modification. Although incorporation by reference to the DBP Guidance provides flexibility, any change that could materially alter the scope of licence obligations should be subject to robust consultation, impact assessment and implementation arrangements. The definition in the Guidance, read together with the definition of Data Custodian, should also clarify the circumstances in which a Code Manager is a Data Custodian and when data is considered to be within its control for the purposes of the relevant obligations. This should include data supplied by Code Parties or held or processed on its behalf where the Code Manager has relevant rights or obligations in relation to that data.
- Adopt an annual cycle as the default for reviewing, updating and publishing the Digitalisation Action Plan, with an earlier review where a material change makes this necessary. Digitalisation and delivery of the Action Plan should also be treated as an ongoing priority within the Strategic Direction Statement, with the Action Plan’s activities and priorities aligned with the Code Manager’s annual SDS Delivery Plan, work-planning and budget-setting processes. This would ensure appropriate prioritisation, stakeholder engagement, scrutiny and resource allocation. Existing Digitalisation Strategies and Action Plans should be recognised for the first compliance cycle where they have been reviewed and, where necessary, updated against the final guidance.
- Explain how SLC 33 and the DBP Guidance interact with existing Code provisions, other licence duties, wider Open Data arrangements and the emerging Data Domain Coordinator framework. Whatever regulatory mechanism is ultimately adopted for Data Domain Coordinators, the final arrangements should distinguish clearly between the Code Manager and Data Domain Coordinator roles and ensure that their respective obligations do not overlap or conflict, whether those roles are performed by separate organisations or by the same organisation. They should also reflect the agreed allocation of responsibilities between Data Domain Coordinators, Code Managers, Central

¹ [“RECCo response to: Data Best Practice as a Code Obligation”](#), RECCo, 11 August 2025

System Delivery Bodies, Code Parties, Data Custodians or data holders and data users. Code Managers should be able to rely on equivalent existing controls rather than duplicate them.

- Retain consultation before guidance changes and provide a reasonable implementation period for material changes, in addition to the proposed minimum period for representations.
- Establish a specific review point once the initial data-domain definitions and enduring Data Domain Coordinator accountability arrangements, including their interface with the Digitalisation Coordination Function, have been settled, and thereafter whenever there is a material change to domain scope or the allocation of responsibilities. The review should assess whether any consequential changes are required to SLC 33, the DSAP or DBP Guidance or associated implementation materials, with any material changes subject to consultation and a reasonable implementation period.

Subject to these points, we support the proposed licence structure.

Q2: If you are not currently a licensed Code Manager, do you voluntarily follow DBP Guidance? If not, what are the key blockers preventing adoption (e.g. data maturity, capability, resource constraints, legacy systems, governance arrangements)?

Currently, there are no licensed Code Managers, although Ofgem has indicated that RECCo may be granted the first Code Manager licence before the end of 2026. We currently follow DBP principles voluntarily to a material extent and are well advanced in establishing the arrangements contemplated by proposed SLC 33.

Our current foundations include:

- DBP concepts embedded in REC Schedule 12: Data Access, together with established data-access, security, privacy and assurance arrangements appropriate to retail-market and consumer data;
- a Data and Digitalisation Strategy aligned with RECCo's Strategy 2025–30 and Forward Work Plan, with defined activities, milestones and intended outcomes;
- a metadata catalogue, defined data roles and responsibilities and a data-quality framework;
- Open Data and Consumer Consents initiatives and digital services that improve discoverability, accessibility and reuse, including the Digital REC platform and Digital Navigator; and
- a commitment to assess the future ECC's data assets and processes against DBP and to include transparent actions, milestones and benefits in future Strategy and Action Plan updates.

We do not see any fundamental blocker to adoption. The principal implementation challenges are clarifying ownership and control across Code Parties and service providers; integrating legacy systems and third-party source data; managing capability and resources during REC licensing and the transition to the ECC; and applying presumed open classification proportionately to personal, commercially sensitive and security-relevant data. Clear scope and proportionate transition will help Code Managers address these challenges without duplicating existing governance or assurance.

Q3: What forms of support, clarification, or guidance from Ofgem would help you, or future Code Managers, to comply with the DBP obligation once it becomes a licence requirement? Please include examples of tools, documentation, or transitional arrangements that would be beneficial.

Ofgem can support effective and consistent implementation by providing a practical, Code Manager-specific implementation package developed with Code Managers as well as network licensees. We would particularly welcome, and would be happy to support Ofgem in developing:

- a gap-assessment checklist or maturity model mapped to the 11 DBP principles, proposed SLC 33 and the outcomes Ofgem expects to see;
- a proportionate DSAP template, worked examples and a common annual reporting calendar aligned with Code Manager Forward Work Plans and strategic direction, with recognition of existing strategies and plans;
- clear guidance on Energy System Data, data ownership and control, legal accountability, personal data, controlled access and the circumstances in which metadata rather than the underlying dataset should be published;
- a cross-framework responsibility map showing how the DBP obligations interact with the Data Domain Coordinator arrangements and identifying, for each relevant activity, whether responsibility sits with the Code Manager, the Data Domain Coordinator, the Data Custodian or data holder, a Central System Delivery Body or another licensee or Code Party. This should cover, as a minimum, domain definition, metadata and cataloguing, data standards and ontology, data quality, data triage, access arrangements, infrastructure change, monitoring, reporting and assurance;
- a common metadata vocabulary and catalogue approach, supported by practical tools. The ENA Data Triage and Metadata Management Playbook and its standardised workbook provide a useful foundation, but network-focused materials should be adapted for Code Manager functions and code-governed data;
- training, practitioner workshops, worked case studies, peer learning, shared threat intelligence and a clear route for seeking advice or escalating difficult triage decisions;
- a clear, outcomes-based assurance framework that avoids duplicate audit and distinguishes source-data quality from the Code Manager's applicable responsibilities and role in relation to metadata, governance, interoperability and access; and
- transitional arrangements that allow existing strategies and controls to be mapped to the final requirements, gaps to be prioritised and closed in phases, and reasonable lead time to implement material guidance changes.

As set out in our response to the consultation on Data Domain Coordinator role guidance, our preferred approach is for the responsibilities of RECCo as a Data Domain Coordinator to be established through the Code Manager licence framework, with supporting operational arrangements reflected in the relevant Codes. If that approach is not adopted, it will be particularly important for Ofgem to coordinate the development of the separate regulatory arrangements and guidance.

More generally, not every Code Manager is expected to act as a Data Domain Coordinator, nor will every Data Domain Coordinator necessarily be a Code Manager. We would therefore welcome Ofgem's ongoing coordination of the final licence and guidance package with its wider work on securing Open Data, Data Triage, Data Domain Coordination and the future digitalisation coordination function. The respective frameworks should be aligned where they interact, while preserving the distinction between the two roles. In particular, the package should take account of the initial domain definitions and final allocation of Data Domain Coordinator responsibilities; use consistent data-governance terminology; and distinguish clearly between coordination and standard-setting, operational delivery, and legal accountability. This will help ensure that organisations performing either or both roles are subject to clear and coherent requirements and are not required to implement overlapping or inconsistent frameworks, or to undertake avoidable rework as the wider data-coordination framework evolves.