RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	**Final Recommendation**

CHANGE REPORT

R0321 DNOS CREATE EXPORT MPANS AFTER APPROVING G98/99 COMMISSIONING DOCUMENTS

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	25 June 2027
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Change Panel	**CHANGE PATH**	Self-Governance
PRIORITISATION CATEGORY	Standard	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	DNOs, Electricity Suppliers		

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

The creation of Import Metering Points for new Premises sits with the Distribution Network Operator (DNO), while the Export Metering Points generally sit with the Electricity Supplier. When the DNO approves the G98 Engineering Recommendation Installation Document (Form B) or G99 Engineering Recommendation Installation Document (Form A3-1 or A3-2) under the Distribution Code, they could create Export Metering Points at this time (with the logical Disconnection process being available for any Export Metering Points that are then not required).

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the REC Change Panel:

- **APPROVE** the proposed change solution**;**
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 25 June 2027.

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BACKGROUND

1 SUMMARY

The creation of Import Metering Points for new Premises sits with the Distribution Network Operator (DNO), while the Export Metering Points generally sit with the Electricity Supplier.

This can lead to a large manual workload for the Electricity Supplier, as in the case of large new development sites they may have several tens of thousands of Metering Points to create. The Proposer provided an example of a contract signed with a developer to create 80,000 new houses, all of which would require Export Metering Points to be created with the same DNO. Currently, the Electricity Supplier would have to send individual requests capped at 50 per day per DNO, or they would have to use the bulk Export Metering Point creation request process as set out in section 7.5 of the RMP Lifecycle Schedule. This is subject to bi-lateral agreement between the Energy Supplier and the DNO, with no two DNOs operating the exact same process.

The number of Export Metering Points required for new housing development sites is expected to hugely increase with the recent Government announcement that developers will be required to install solar panels and heat pumps across all new homes in England.

Under the Distribution Code, there is an obligation for all installers of generation equipment to have the set up approved by the DNO once it has been commissioned. This ensures the equipment has been installed safety, in line with all relevant codes and the installation will not cause problems within the local network area. This process is Engineering Recommendation G98 and G99, and forms part of Annex 1 of the Distribution Code. This Change Proposal suggests that the Export Metering Point could be created by the DNO after they have approved the G98 or G99 commissioning document, without the need for a request from the Electricity Supplier.

This Change Proposal was raised separately to I0228 ECOES API for Export MPAN Creation at Scale, as it is thought this proposed solution may work better for Export Metering Points, particularly for large new housing development sites rather than them still being raised by the Electricity Supplier under any solution proposed by I0228. However, if this Change Proposal is unable to progress separately or the solution is later deemed to be unworkable, the bulk creation of Export Metering Points at large new housing development sites will be added back into the business case for I0228.

2 PROBLEM STATEMENT

The information required by the DNO to create an Export Metering Point sits with the Consumer rather than the Electricity Supplier and leads to the Electricity Supplier acting as an unnecessary third party in the process. This is leading to unnecessary time being added to the process, negatively impacting Consumers and the journey to Net Zero. This is particularly apparent for large new housing developments, which may have several tens of thousands of Export Metering Points to create with the same DNO and require the use of the Bulk Request process. This process is cumbersome and has no two DNOs operating the process in the same way.

3 IMPACTS

CONSUMERS
Electricity Consumers

REC PARTIES AND SERVICE USERS
DNOs
Electricity Suppliers

REC DOCUMENTS / PRODUCTS
Schedule 27 – RMP Lifecycle

MHHS
There are no impacts to MHHS identified with this Change Proposal.

4 CROSS-CODE IMPACTS

There are no cross-code impacts identified with this Change Proposal. It has been flagged at the Cross Code Steering Group (CCSG) and will continue to be monitored.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Change Proposal		**26 Mar 26**	**19 Oct 26**
	Code Manager initial assessment	March	April
	Party impact assessment	May	June
	Solution refinement	June	July
	Business Case Assessment	June	July
	Consultation	August	September
	Final Determination	October	October
Voting		**20 Oct 26**	**20 Oct 26**
	Appeal Window	21 Oct 26	04 Nov 26

No solution development or legal review is required as part of this Proposal Plan. The Code Manager acted as a critical friend to the Proposer prior to the submission of this Change Proposal, and the proposed legal text was reviewed by the REC Legal Advisors prior to the Change Proposal being raised.

The solution and legal text did change during the progression of this Change Proposal however, which is covered in the solution section of this Change Report.

6 PRIORITISATION CATEGORY AND URGENCY

6.1 PROPOSER REVIEW

This Change Proposal was submitted prior to 29 May 2026, the implementation of the Ofgem Code Prioritisation Harmonisation. There was no requirement for the Proposer to provide their review of the Prioritisation Category and Urgency when this was Change Proposal was submitted.

6.2 CODE MANAGER REVIEW

The Code Manager has proposed this Change Proposal be given an Urgency Status of Standard and a Prioritisation Category of Standard.

The Code Manager believes this Change Proposal:

- Does not meet the Ofgem criteria for Urgency;
- Has a weak alignment to the Strategic Direction Statement (SDS), as it has limited or no SDS relevance when compared to other Standard changes;
- Has medium importance, as it delivers useful but broadly comparable benefits to other Standard changes; and
- Has a medium complexity, as it must balance the request of the Proposer with the safety obligations and requirements in place for DNOs.

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SOLUTION

7 PROPOSED SOLUTION

The proposed solution makes changes to REC Schedule 27 – RMP Lifecycle, proposing that the DNO should create the Export Metering Point once they have approved the G98 Engineering Recommendation Installation Document (Form B) or G99 Engineering Recommendation Installation Document (Form A3-1 or A3-2) under the Distribution Code.

This is proposed as section 3.1(e) to Schedule 27, with a link available to the full legal text within section 8 of this Change Report.

This obligation is not limited to large new development sites, although they will constitute the bulk of the business case for this Change Proposal. This obligation would apply to all G98 Engineering Recommendation Installation Documents (Form B) or G99 Engineering Recommendation Installation Documents (Form A3-1 or A3-2) approved after the implementation of this Change Proposal, including single Sites.

This is also not restricted by sector and is applicable to Domestic and Non-Domestic Premises.

7.1 DESCOPED SOLUTION

The proposed solution at Party impact assessment was as below. This has been rewritten as the trigger point of the obligation is vague and would be difficult to assure. There were also concerns raised around the safety of creating an Export Metering Point before generation equipment has been commissioned and approved by DNOs at Party impact assessment.

3.1 Where a Distribution Network Operator:

(a) creates a new connection to a Location from its Distribution System (unless the Metering Point is to be registered in the Central Meter Registration Service);

(b) agrees with an Electricity Supplier that a new Metering Point should be created in accordance with Paragraph 7;

(c) decides to enter a new Metering Point within its Electricity Retail Data Service; or

(d) is notified of an approved transfer from the Central Meter Registration Service to the Supplier Meter Registration Service in accordance with the BSCP68,

then the Distribution Network Operator~~it~~ shall ensure that a record for a new Metering Point is entered within its Electricity Retail Data Service and sent to the CSS Provider in accordance with the interface table below. Where the Distribution Network Operator is aware that the Location will Export electricity, the Distribution Network Operator shall create a new record for an Export Metering Point (as well as an Import Metering Point).

8 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0321 can be found here.

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PRELIMINARY ASSESSMENT

9 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

9.1 SERVICE PROVIDER IMPACT ASSESSMENTS

No Service Provider impact assessment was required as part of this Change Proposal.

9.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was conducted from 08 May 2026 to 01 June 2026. In total seven responses were received from five DNOs and two Energy Suppliers. The non-confidential responses have been published here.

ENERGY SUPPLIERS	• Both Energy Suppliers were supportive of the proposed solution, and had no comments on the legal text provided for Party impact assessment. • One Energy Supplier requested clarity on what is considered a large development; the Code has adjusted this Change Report to clarify the scope of the Change Proposal is not limited to this. • Both Energy Suppliers confirmed they would require no to minimal lead time to implement this Change Proposal and there were no constraints they were aware of regarding when this Change Proposal could be implemented. • Neither Energy Supplier believed the implementation of this Change Proposal would impact their MHHS Qualification or Migration plans. • Both Energy Suppliers confirmed this Change Proposal would have no costs to them to implement. • One Energy Supplier confirmed they saw benefits from the implementation of this Change Proposal through improved Smart Export Guarantee (SEG) processing efficiency, reduction in the need for repeat communications between the Electricity Supplier, DNO and Consumer, and that it would contribute to Net Zero goals. • Both Energy Suppliers believed this Change Proposal should be implemented.
DISTRIBUTION NETWORK OPERATORS	• Two DNOs raised safety concerns around creating Export Metering Points before any generation equipment had been properly commissioned and approved by the DNO. The Code Manager has worked with both DNOs to amend the solution. • Several DNOs raised queries around what is considered to be a large new development site, and the Code Manager has adjusted this Change Report to clarify the scope of the Change Proposal is not limited to this.

	• There were questions raised by DNOs around the volumes of Export Metering Points that have been created but never registered by an Electricity Supplier. This has been flagged to the REC Performance Assurance team. • One DNO suggested that Electricity Suppliers should be mandated to send a logical Disconnection request where they are made aware by the Consumer that the Export Metering Point is no longer required. This would need to be raised to the Distribution Connection and Use of System Agreement (DCUSA), as this process sit within DCUSA Schedule 33. There would also need to be consideration as to how this could work where there is no Electricity Supplier Registered to the Metering Point. • One DNO flagged they saw impacts to the DCUSA and the Connection and Use of System Code (CUSC). Upon further discussion with this DNO, no direct impacts have been identified. No impacts have been identified by DCUSA or CUSC at the CCSG. • Of the DNOs who confirmed what lead time they would require between approval and implementation, this ranged between six, nine and twelve months. No constraints on when this Change Proposal could be implemented were flagged. • All DNO respondents confirmed they foresaw costs to implement this Change Proposal. Three confirm they saw this cost as being between £10,000 and £49,000, and two did not confirm a cost/range. • Benefits identified by DNOs included improved customer service and a more seamless process for Consumers as they would no longer have to go via their Electricity Supplier to request an Export Metering Point, and the ability to group requests from developers rather than receiving 1000s of individual requests from Electricity Suppliers. Some DNOs identified no benefits from the implementation of this Change Proposal as presented at Party impact assessment, but believed it could deliver benefit if the amendments suggested were taken on board.

9.3 SUMMARY OF AMENDMENTS MADE FOLLOWING IMPACT ASSESSMENT

The legal drafting has been changed completely following Party impact assessment with the assistance of two DNO respondents.

10 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

There are no issues or dependencies associated with this Change Proposal.

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A01.R0321	The rate of logical Disconnections will not significantly increase.	A DNO raised a concern to the Code Manager this Change Proposal will increase the number of logical Disconnections they have to process. Data taken from the Electricity Enquiry Service (EES) in April 2026 shows that currently around 3.23% of Export Metering Points created have been Disconnected since their creation.	It is not possible to validate this assumption. However, the Code Manager is comfortable with the assumption that the Disconnection rate will not increase, due to the announced Government policy of all new Premises requiring solar panels and it being unlikely that Export Metering Points for new Premises will require Disconnection. This will also be monitored as part of benefits realisation analysis following implementation of this Change Proposal.
A02.R0321	Export Metering Points are required for generation equipment if the Consumer does not sell any excess energy/have an Export tariff, for Settlement purposes.	An assumption has been made that an Export Metering Point is required where there is generation equipment on a Premises even if the Consumer has no Export tariff, so the amount of electricity Exported to the grid is registered for Settlement purposes. This means it is still valid for an Export Metering Point to be created and to be Registered by an Electricity Supplier, even if the Consumer has no Export tariff set up.	Invalidated – the Balancing and Settlement Code (BSC) has confirmed there is no requirement for an Export Metering Point to be created if the Consumer has no Export tariff. The only requirement in the BSC is that Licensable Generation Plants have to be registered in Settlement – e.g. anything over 50MW must have an Export Metering Point (unless granted a specific derogation by the Secretary of State). Any generation not captured by an Export Metering Point will be part of the correction

			factor processes at the GSP level.

NO.	RISK	NOTES	MITIGATION
R01.R0321	There is a risk the proposal could lead to the creation of MPANs that are unnecessary, remain untraded, and subsequently require investigation and disconnection by the DNO.	Raised by a DNO during consultation.	The Code Manager will monitor MPANs that are created but not registered as part of the benefits realisation analysis of this Change Proposal, should it be approved for implementation. If there is a substantial increase in this activity it will be addressed via a future Issue.

The Code Manager asked a question at consultation for DNOs to confirm how many G98 Engineering Recommendation Installation Documents (Form B) or G99 Engineering Recommendation Installation Documents (Form A3-1 or A3-2) they approve that never require an Export Metering Point to be created.

From the information gathered, the Code Manager determined no changes to the solution are required but will monitor MPANs that are created but not registered as part of the benefits realisation analysis of this Change Proposal.

11 BUSINESS CASE ASSESSMENT

11.1 COSTS

There are no central systems costs associated with this Change Proposal.

Two of two Energy Suppliers confirmed they foresaw their costs as £0 to implement this Change Proposal.

Five of five DNOs confirmed they foresaw costs to implement this Change Proposal, with three of five confirming they saw these costs as being between £10,000 and £49,999.

11.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
REDUCED ADMINISTRATION FOR ELECTRICITY SUPPLIERS	The implementation of this Change Proposal will see a reduced administrative burden for Electricity Suppliers as they would not be required to request an Export Metering Point. Instead, the DNO would create them upon approval of the G98 Engineering Recommendation Installation Document (Form B) or G99 Engineering Recommendation Installation Document (Form A3-1 or A3-2). This benefit will be seen particularly in the cases of large new housing developments, where the Bulk Request Process for Export Metering Points (which is cumbersome and manual, with different DNOs using different processes) will no longer be required. The G98/G99 form is often requested by DNOs from the Electricity Supplier when they request a new Export Metering Point, with the Electricity Supplier likely not having this information without contacting the Consumer or developer. Removing the Electricity Supplier from this process introduces efficiency overall.
ASSIST NET ZERO GOALS	The number of Export Metering Points required for new housing is expected to hugely increase with the recent Government announcement that developers will be required to install solar panels and heat pumps across all new homes in England. This is in aid of the Government goals to reach Net Zero by 2050. This Change Proposal aims to streamline the process for the creation of Export Metering Points. Any and all efficiencies than can be made to this process will assist with this goal.
EXPORT DATA WITHIN SETTLEMENT MORE ACCURATE	The creation of a large number of Export Metering Points with a single DNO can be lengthy. If an Electricity Supplier needs to create 5,000 Export Metering Points for a new housing development, this could take 100 Working Days to send the requests to the DNO without the bulk Export Metering Point creation request process (50 per day maximum). Alternatively, if the bulk Export Metering Point creation request process is used, this is subject to bi-lateral agreement between the Electricity Supplier and DNO, with many DNOs operating different processes and timescales. There may also be a delay in the Export Metering Point being created at the Electricity Supplier request if the DNO requests the G98/99 document from the Electricity Supplier, which the Electricity Supplier must in turn request from the Consumer.

	Due to this length of time, the Premises could be Exporting electricity before the Export Metering Point is created and this data would never be entered into Settlement as the Electricity Supplier cannot backdate their Effective From Date. The creation of the Export Metering Point at the point of approval of the G98 Engineering Recommendation Installation Document (Form B) or G99 Engineering Recommendation Installation Document (Form A3-1 or A3-2) by the DNO means this scenario is less likely to occur. The Export Metering Point will be available to Register by the Electricity Supplier as soon as possible.
IMPROVED EXPERIENCE FOR CONSUMERS	The implementation of this Change Proposal should see a more streamlined process, leading to an improved experience for Consumers. Their Export Metering Point will be created at the point of approval of the G98 Engineering Recommendation Installation Document (Form B) or G99 Engineering Recommendation Installation Document (Form A3-1 or A3-2), without the Consumer needing to contact an Electricity Supplier to kickstart this process. It would also allow for the Consumer who contracted with an Electricity Supplier for an Export tariff to be set up on this tariff faster, as the Export Metering Point should already be available for the Electricity Supplier to Register once the generation equipment has been commissioned and approved by the DNO. This should reduce delays in Consumers being placed on their chosen tariff, as they are not waiting for an Export Metering Point to be created.
ABILITY TO GROUP REQUESTS FOR LARGE NEW DEVELOPMENT SITES	One DNO highlighted a benefit they saw from the implementation of this Change Proposal as the ability to group together requests for large, new development sites. Currently for new housing developments which require hundreds or thousands of Export Metering Points, if an Electricity Supplier chooses not to use the Bulk Request Process they will send 50 individual requests to the DNO per day. By removing the Electricity Supplier from this process, the DNO could manage this workload according to their internal processes, which would give them the capability to group these requests together if they so wished.

11.3 COST BENEFIT ANALYSIS

There are no central systems costs, costs to Parties are in line with the changes being proposed and five intangible benefits associated with this Change Proposal. As such, the Code Manager believes there is a positive case for change.

12 CASE FOR CHANGE

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

- Is both viable and implementable, and effectively resolves the problem statement;
- Has no associated central system costs and costs to Parties are in line with the changes being proposed;
- Has proportionate effort required for implementation;
- Reduces the administrative burden for Electricity Suppliers in the creation of Export Metering Points, without increasing the administrative burden for DNOs;
- Will assist with the Government's Net Zero goals by introducing efficiencies into the process for creating Export Metering Points;
- Will allow Export data from Export Metering Points to be entered into Settlement as early as possible, meaning Settlement will be more accurate;
- Provide an improved Consumer experience, including allowing Consumers to enter onto their chosen Export tariff as soon as possible; and
- Allow DNOs to group requests for Export Metering Points for large new development sites if they wish (rather than receiving 50 individual requests per day from an Electricity Supplier).

13 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 21 August 2026 to obtain views on the Change Report (For Consultation). In total six responses were received from two Energy Suppliers and four DNOs. One response was marked as confidential. The key themes from these responses have been summarised and set out below. The non-confidential responses have been published here.

13.1 SUMMARY OF RESPONSES

Overall, there was support for the Change Proposal, with most respondents agreeing that responsibility for creating Export MPANs should sit with the DNO once the relevant G98/G99 commissioning documentation has been approved. One respondent did not support the proposal, citing concerns that Export MPANs may be created where they are ultimately not required.

13.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

There was broad support for explicitly referencing the G98/G99 commissioning documents as the trigger for Export MPAN creation, however, one respondent suggested using broader wording such as "all commissioning documentation requested by the DNO".

Five out of the six respondents supported explicit references as they provide a clear and auditable trigger for the new obligation.

13.3 BENEFITS RELATIVE TO IMPLEMENTATION AND OPERATIONAL COSTS

Respondents broadly agreed with the Code Manager's assessment of benefits and operational costs.

13.4 IMPLEMENTATION DATE AND APPROACH

All respondents agree with the implementation approach of Big Bang, and the proposed implementation date of 25 June 2027.

14 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

A new risk has been captured in the Change Report, R01.R0321. The Code Manager will monitor MPANs that are created but not registered as part of the benefits realisation analysis of this Change Proposal, should it be approved for implementation. If there is a substantial increase in this activity it will be addressed via a future Issue.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
CONSOLIDATED CONSULTATION RESPONSES	Link
RELATED CHANGE(S)	I0228 ECOES API for Export MPAN Creation at Scale

16 GLOSSARY

TERM	DEFINITION
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Electricity Supplier	means a person holding an Electricity Supply Licence.
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Export	means electricity which is exported from a Premises.
Export Metering Point	means a Metering Point which identifies exports from a Location.
Import	means electricity which is imported to a Premises.
Meter Point Administration Number (MPAN)	means the unique reference number used to identify electricity Metering Points.