RETAIL ENERGY CODE

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

CHANGE REPORT

R0268 CONSEQUENTIAL CROSS-CODE CHANGE FOR BSC P441 - COMPLEX SITE CLASSES CREATION

DOCUMENT VERSION	V2.0
PROPOSED IMPLEMENTATION DATE	The same date as P441, with a minimum of 5 Working Days between Authority decision and implementation
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Metering Expert Panel	**CHANGE PATH**	Authority Determined
PRIORITY STATUS	High	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Electricity Suppliers, MOAs, DNOs		

LEAD ANALYST (SOLUTION LEAD)	SUBJECT MATTER EXPERT
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OVERVIEW

The Balancing and Settlement Code (BSC) modification P441 is looking to introduce Complex Site classes which would categorise the types of Complex Site with each having clearly defined criteria within the BSC whilst also facilitating a new "type" of Complex Site (referred to as a Class 6 Complex Site) to allow approval of "non-standard" Complex Sites. It will also clarify when the netting of Imports from Exports for multiple Metering Systems registered in Supplier Volume Allocation (SVA) is permitted.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the REC Metering Expert Panel recommend that the Authority:

- **APPROVE** the proposed implementation date the same date as P441, with a minimum of 5 Working Days between Authority decision and implementation.

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BACKGROUND

1 SUMMARY

BSC modification P441 was raised in August 2022 following a recommendation of the BSC Issue 88 Workgroup (which looked to introduce Complex Site classes) and during the initial consideration of the proposal it became clear that there would need to be complementary changes to the Retail Energy Code (REC) and to the Distribution Connection Use of System Agreement (DCUSA).

This Change Proposal and DCUSA change proposal DCP424 are consequential changes needed to support P441. The BSC believes that Complex Sites have great potential to help develop new arrangements to help drive a smart network, achieve a zero-carbon Energy system, and that by introducing Complex Site classes it will allow the approval of new types of Complex Sites and will clarify the netting of Imports from Exports for multiple Metering Systems.

The REC will need to reflect these new Complex Site classes, and this Change Proposal will facilitate this by introducing requirements into Schedule 14 – Metering Operations.

2 PROBLEM STATEMENT

The introduction of new Complex Site classes is needed into the REC to facilitate the solutions under BSC P441 and DCP 424.

3 IMPACTS

CONSUMERS
Electricity Consumers with Complex Sites

REC PARTIES AND SERVICE USERS
Electricity Suppliers
MOAs
DNOs

REC DOCUMENTS / PRODUCTS
Schedule 14 – Metering Operations

MHHS
There are no impacts to MHHS from this Change Proposal.

4 CROSS-CODE IMPACTS

This is a cross-code change with BSC modification P441 and DCUSA change proposal DCP424.

The BSC is the lead code for these changes, as determined by the Cross Code Steering Group (CCSG)

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**13 Aug 25**	**23 Oct 25**
	Solution Development	August	October
Change Proposal		**24 Oct 25**	**13 Jan 26**
	Business Case Assessment	October	October
	Consultation	October	November
	Final Determination	November	January
Voting		**11 Mar 26**	**11 Mar 26**
	Issue to Authority for determination	12 Mar 26	12 Mar 26

This plan has been developed alongside the BSC and DCUSA to ensure all three modifications are aligned in going for consultation and for final decision.

No impact assessment is proposed as one was conducted under previous REC Change R0133 Consequential Cross-Code Change for BSC P441 - Complex Site Classes Creation.

6 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	2	27	53
	Retail Markets Impact	Innovation and Market Arrangements	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	7	7
		Legal and Regulatory Compliance	1	14	14
Resource	Complexity / Effort / Duration		1	9	9
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		1		8
Urgency *(The need to progress a change to meet a targeted date)*		Cross Code Activity	3	10	30
				Overall Priority Score (rounded)	163

Priority Status	HIGH
Change Proposal Type	STANDARD

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SOLUTION

7 SUMMARY OF ANALYSIS UNDERTAKEN

The overall solution was developed by the working group under BSC modification P441.

The working group met between 31 August 2022 and 11 June 2025 with 12 sessions, the notes of which are available on the BSC website (link above).

8 PROPOSED SOLUTION

The REC solution proposes changes to Schedule 14 – Metering Operations clause 2.27, and Appendix 2.

The proposed changes to clause 2.27 are:

When the MOA sends Meter Technical Details and identifies a Complex Site, they shall also provide all required information, via the Complex Site Supplementary Information Form, including the Complex Site class (detailed below), to each recipient of the Meter Technical Details, to enable collection of data from the Metering Asset.

Complex Site Classes

- *Classes 1 and 2 – Licensed Exempt Distribution Network*
- *Classes 3 and 4 – Feed through sites and network flows impacting Settlement Meters*
- *Class 5 – Netting of Imports from Exports across multiple Boundary Points over the Total System*
- *Class 6 – Non-standard Complex site*

Appendix 2 has also been amended to add Complex Site class to the Complex Site Supplementary Information Form.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0268 can be found here.

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PRELIMINARY ASSESSMENT

10 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

10.1 SERVICE PROVIDER IMPACT ASSESSMENTS

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

10.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was not conducted as part of this Change Proposal.

One was conducted under previous REC Change R0133 Consequential Cross-Code Change for BSC P441 - Complex Site Classes Creation. The non-confidential responses to that impact assessment are published here.

11 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

11.1 RISKS AND ISSUES

There are no risks or issues identified with this Change Proposal.

11.2 ASSUMPTIONS AND DEPENDENCIES

NO.	DEPENDENCY	NOTES	STATUS
D01.R0268	This is a cross-code change where the BSC are the lead code. Implementation of this Change Proposal is dependent on approval of BSC P441.	The REC, DCUSA and BSC are working collaboratively and monitoring this through CCSG. The plans for these Change Proposals have been aligned so that the Authority receive all three for determination as close together as possible.	Open.

There are no assumptions identified with this Change Proposal.

12 BUSINESS CASE ASSESSMENT

12.1 COSTS

There are no central systems costs associated with this Change Proposal. Impacts to Parties under the REC are expected to be minimal.

Impacts to Parties under the BSC and DCUSA and the costs expected under these codes will be captured in their respective reports.

12.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
MOVE TOWARDS NET ZERO	Complex Sites have great potential to help develop new arrangements to help drive a smart network and achieve a zero-carbon energy system; however, there needs to be further clarity to the arrangements to provide confidence they are set up to be settled and billed correctly.
LOCAL ENERGY SCHEME ENABLEMENT	As Local Energy Schemes are predicted to become more popular (which rely on the allowance of netting Imports from Exports across the Total System), it is essential that the rules for when netting should be permitted are clearly defined going forwards. This change facilitates arrangements to help achieve this objective.
ALIGNMENT ACROSS INDUSTRY CODES	This is an enabling change within a wider set of industry changes to fully deliver the introduction of Complex Site classes within the BSC and DCUSA.

12.3 COST BENEFIT ANALYSIS

As there are no costs identified and three intangible benefits, the Code Manager believes there is a positive case for change for the implementation of this Change Proposal.

Furthers costs and benefits are laid out in the respective reports from BSC and DCUSA.

13 CASE FOR CHANGE

AUTHORITY DETERMINATION

The Code Manager believes that R0268 better facilitates the following REC Objectives:

OBJECTIVE	IMPACT TYPE	DESCRIPTION AND JUSTIFICATION
To ensure the REC operates and evolves in a manner that facilitates the achievement of its mission statement[1]	Positive	The REC mission statement is to "facilitate the efficient and effective running of the retail energy market, including its systems and processes through promoting innovation, competition, and delivering positive customer outcomes". The Code Manager believes this Change Proposal positively impacts this objective as the introduction of Complex Site class adds clarity and ultimately leads to positive Consumer outcomes (captured below).

[1] REC Mission Statement

To ensure customers interests and data is protected in the operation of the REC	Positive	The introduction of Complex Site class should allow for greater clarity when setting up Local Energy Schemes (which rely on the allowance of netting Imports from Exports across the Total System). This will benefit Consumers and be a facilitator towards net zero goals.
To drive continuous improvements and efficiencies in the operation of the REC and the central systems and communication infrastructures it governs	Positive	The Code Manager believes this Change Proposal positively impacts this objective as the introduction of Complex Site class adds clarity to the Complex Site process.

Further points to consider are detailed in the respective reports from BSC and DCUSA.

14 SUMMARY OF CONSULTATION RESPONSES

14.1 FIRST CONSULTATION ON PROPOSED SOLUTION, IMPLEMENTATION APPROACH AND IMPLEMENTATION DATE

A consultation was circulated on 24 October 2025 to obtain views on the Change Report (For Consultation). In total five responses were received from two Energy Suppliers, a Metering Equipment Manager (MEM), a Distribution Network Operator (DNO) and a local energy market developer. The key themes from these responses have been summarised and set out below. The non-confidential responses have been published here.

14.1.1 SUMMARY OF RESPONSES

Four respondents were supportive of this Change Proposal and one respondent was against the implementation of this Change Proposal.

14.1.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

Four respondents were supportive of the proposed solution and legal text, and provided no comments.

One respondent believes this solution is not workable under the MHHS arrangements as the MOA would not be able to identify a Complex Site as this information is currently only held in the D0268 (Advanced Meter Technical Details) Market Message.

They highlighted that there is no Complex Site Indicator in either the D0149 (Notification of Mapping Details) or D0150 (Traditional Meter Technical Details) Market Messages, or in the IF-005 (MTD Updates to SMRS) and IF-006 (SMRS Notification of MTD Updates) Market Messages, so the solution as stands only works for the Advanced market.

The Code Manager has passed this feedback to the BSC as the Lead Code for these changes to consider.

14.1.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

All respondents confirmed they agreed with the Code Manager's assessment of the costs and benefits for this Change Proposal.

One respondent included a caveat that while they agreed with the benefits this Change Proposal was aiming to achieve have been accurately captured, they did not believe the solution at present would help realise these.

All respondents agreed that this Change Proposal should be subject to determination by the Authority following review by the Metering Expert Panel.

14.1.4 IMPLEMENTATION DATE AND APPROACH

All respondents confirmed they agreed with the Code Manager recommendation of a big bang implementation approach.

Three respondents confirmed they agreed with the Code Manager recommendation of the implementation date being 25 June 2026 if Authority determination is received by 25 May 2026, or 05 November 2026 if Authority determination is received after 25 May 2026 but before 05 October 2026. One of these three respondents stated they did have a preference for the November 2026 release.

Two respondents disagreed with this proposed implementation date; one stating they required six months between approval and implementation and the other stating they did not believe either release was appropriate as they did not think this solution is workable under MHHS. These views have been passed back to the BSC as the Lead Code for these changes to consider.

14.2 SECOND CONSULTATION ON IMPLEMENTATION DATE

14.2.1 SUMMARY OF RESPONSES

On 27 August 2026, the Authority published their decision and direction to send back R0268, with further direction to review and revise the implementation date. R0268 and DCUSA DCP424 form part of a wider cross-code package sitting alongside BSC Modification P441. The expected submission date for DCP424 has moved beyond the previously recommended R0268 decision date of 05 October 2026. As a result, the implementation and decision timetable for R0268 no longer aligned with the associated modifications that are intended to operate alongside it.

A second consultation was circulated on 11 September 2026 to obtain views on the second proposed implementation "the same date as P441, with a minimum of 5 Working Days between Authority decision and implementation". In total, four responses were received from one Energy Supplier, two DNOs and one MEM. The key themes from these responses have been

summarised and set out below. The non-confidential responses have been published here.

14.2.1 COMMENTS ON THE PROPOSED IMPLEMENTATION DATE

All respondents confirmed that they agreed with amending the proposed implementation date to "the same date as P441, with a minimum of 5 Working Days between Authority decision and implementation".

One respondent noted that there was no updated reference in the P441 to a 'minimum 5 Working Days between Authority decision and implementation'. The Code Manager has liaised with the BSC and DCUSA change leads to ensure alignment on implementation dates and provided a copy of the respondent's feedback to the BSC. The Code Manager further noted that the BSC's P441 Send Back Procedure is to be approved by SVG on 08 October 2026. However, due to R0268's proposed implementation date of 06 November 2026, the REC had to issue this second consultation ahead of the BSC's P441 Send Back Procedure approval by the SVG.

No further comments were raised regarding the proposed implementation date, however, one respondent noted ongoing discussions under DCP424 which may require further changes to R0268 and P441's proposed solutions. The Code Manager is liaising with BSC and DCUSA colleagues, as well as Ofgem to assess whether changes to the proposed solution under DCP424 will impact R0268's proposed solution. At this moment, no changes to R0268's proposed solution are envisaged.

15 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

The implementation dates have been amended from:

- **26** June 2026 if Authority decision received by 25 May 2026; or **06** November 2026 if Authority decision received by 05 October 2026.

To:

- the same date as P441, with a minimum of 5 Working Days between Authority decision and implementation.

This proposed implementation date is open-ended so as to prevent an additional send-back and consultation round on the implementation date.

16 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED CONSULTATION RESPONSES – CONSULTATION 1	Link
CONSOLIDATED CONSULTATION RESPONSES – CONSULTATION 2 ON IMPLEMENTATION DATE	Link
RELATED CHANGE(S)	BSC - P441 Creation of Complex Site Classes DCUSA – DCP424 Use of System charging for Complex Sites Previously withdrawn REC Change - R0133 Consequential Cross-Code Change for BSC P441 - Complex Site Classes Creation
AUTHORITY SEND-BACK LETTER ON IMPLEMENTATION DATE	R0268 Authority send back letter on implementation date

17 GLOSSARY

TERM	DEFINITION
Balancing and Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
Complex Site	means any site that requires a 'Complex Site Supplementary Information Form' to be sent by the Meter Operator Agent to enable Supplier Agents to interpret the Meter Technical Details and calculate consumption data for Settlement purposes.
Complex Site Supplementary Information Form	means the form set out in Appendix 2 of the Metering Operations Schedule that is sent in addition to the meter Technical Details for a Complex Site.
Cross Code Steering Group (CCSG)	means the group of that name described in Paragraph 3 of the Change Management Schedule.
Distribution Connection and Use of System Agreement (DCUSA)	means the agreement of that name maintained pursuant to the Electricity Distribution Licences.

Export	means electricity which is exported from a Premises.
Import	means electricity which is imported to a Premises.