RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0252 - INCREASING FREQUENCY OF ANNUAL PORTFOLIO RECONCILIATION EXERCISE TO SUPPORT DATA CLEANSE

On 12 February 2026 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for R0252.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	01/04/2026
RESPONSIBLE COMMITTEE	REC Metering Expert Panel
LEAD ANALYST	Lydia Bentley

DATE IMPACT ASSESSMENT ISSUED	12/02/2026
RESPONSE DEADLINE	06/03/2026

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Eon Next Energy Supplier	No	Thank you.
Scottish Power Energy Supplier	We welcome the proposed solution. However, we suggest that instead of conducting the reconciliation exercise on a bi-annual basis, it should be undertaken four times a year (quarterly). Increasing the frequency would help further improve the accuracy and reliability of data held within industry systems and better support the ongoing data-cleansing activities that parties are required to carry out.	Thank you. The Code Manager acknowledges the respondents viewpoint, and understands the perceived benefit of increasing the reporting frequency beyond the proposed two times per year. However, based on the conversations that the Code Manager has had with the CDSP, there are constraints associated with an increase in report frequency. As such, the Code Manager minded to position it to explore the viability of a twice annual report, with the option to explore a further increase in the future in a new Issue or Change.

Question 2:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Eon Next Energy Supplier	Yes	Thank you.
Scottish Power Energy Supplier	Yes, we agree the proposed solution addresses the problem statement. Please see our comment in Q1.	Please see response to Q1.

Question 3:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Eon Next Energy Supplier	No	Thank you.
Scottish Power Energy Supplier	Please see our response to Q1.	Please see response to Q1.

Question 4:	Do you think we have identified and considered all processes and scenarios that may be impacted through the implementation of the proposed change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Eon Next Energy Supplier	Yes	Thank you.
Scottish Power Energy Supplier	Yes	Thank you.

Question 5:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Eon Next Energy Supplier	No	Thank you.
Scottish Power Energy Supplier	We have no comments on the proposed legal text.	Thank you.

Question 6:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Eon Next Energy Supplier	We do not need a significant lead time on the implementation of this change.	Thank you.
Scottish Power Energy Supplier	-	Thank you.

Question 7:	Are you aware of any constraints on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Eon Next Energy Supplier	No	Thank you.
Scottish Power Energy Supplier	-	-

Question 8:	Would implementing the proposed solution incur any costs to your business? If so, please provide details breaking down design/build/test costs and on-going costs. If preferable, please indicate which of the below ranges your costs may fall: A. Nil; B. Up to £9,999; C. Between £10,000 and £49,999; D. Between £50,000 and £99,999; or E. more than £100,000.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Eon Next Energy Supplier	Not that we have identified.	Thank you.
Scottish Power Energy Supplier	We are unable to accurately assess costs at this stage.	Thank you.

Question 9:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Eon Next Energy Supplier	Yes, if the data provided is amended to reflect the install date as it is difficult to determine what needs to be worked.	The Code Manager is not looking at changing the content of the report at this time, merely the frequency and turnaround time. The Code Manager is open to exploring this however, and would welcome a separate discussion on this.
Scottish Power Energy Supplier	Yes, this would support improved reliability of the data held within industry systems.	Thank you.

Question 10:	Taking into consideration both the costs and the benefits seen by your organisation, do you consider this change should be made?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Eon Next Energy Supplier	We have no concerns with this change being implemented.	Thank you.
Scottish Power Energy Supplier	Yes	Thank you.

Question 11:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Eon Next Energy Supplier	We have raised the issue several times in relation to the majority of mismatches being due to the meter install date, which we do not hold. As the output from CDSP doesn't specify what item is mismatched we cannot identify the ones which need to be worked. If an additional column is added to identify what item is mismatched this will ensure that these can be resolved.	Please see response to Q9.
Scottish Power Energy Supplier	No further comments.	Thank you.