RETAIL ENERGY CODE

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

CHANGE REPORT

R0191 INTRODUCTION OF SLA FOR SUPPLIER DE-REGISTRATION ON DISCONNECTED METERS

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	07 November 2025
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Change Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	Low	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Energy Suppliers		

LEAD ANALYST (SOLUTION LEAD)	SUBJECT MATTER EXPERT
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OVERVIEW

It has been identified that there are a number of meters that are showing as Terminated but Energised. This has been discussed previously at REC Issues Group and within MHHS Data Cleanse environments.

RESPONSIBLE COMMITTEE DECISION

On 05 August 2025, the REC Change Panel voted, in line with the Code Manager recommendation to:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 07 November 2025.

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BACKGROUND

1 SUMMARY

It has been identified that there are a number of meters that are showing as Terminated but Energised. These MPxNs are still showing as Secured Active in the Central Switching Service (CSS) and can be settled/billed against even if the MPxN is Disconnected. Further analysis was carried out by the Code Manager which included Terminated and De-Energised MPXNs. Both have been discussed previously at REC Issues Group (RIG) and within MHHS Data Cleanse environments.

Data from December 2024 showed there were ~45,000 MPANs with this issue, of which ~41,000 were split between only six Supplier MPIDs. More recent data from 30 April 2025 showed this had reduced to 40,000 MPANs showing as Terminated but not De-registered, of which 35,000 were split between the same six Supplier MPIDs.

Discussions at RIG identified that REC is potentially lacking detail/obligations/timescales on Suppliers to report/update/respond to Disconnection queries and suggested that timescales be added to Schedule 27 – RMP Lifecycle.

2 PROBLEM STATEMENT

There is no time scale by which Energy Suppliers need to have submitted the Registration De-Activation Request, or for electricity, to have raised a query with the Distribution Network Operator (DNO) if they believe the Metering Point should not be Disconnected. This raises difficulties for the REC Performance Assurance team when monitoring and enforcing this obligation.

3 IMPACTS

CONSUMERS	REC PARTIES AND SERVICE USERS	REC DOCUMENTS / PRODUCTS
Direct – prevents potential Switches or billing on Disconnected meters	Energy Suppliers	Schedule 27 – RMP Lifecycle

MHHS
There is indirect impact to the MHHS Code Drafting which is also making changes to Schedule 27 – RMP Lifecycle. The Code Manager monitored this throughout the change to ensure there was no conflict between the drafting.

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4 CROSS-CODE IMPACTS

There are no cross-code changes associated with this change.

The MPANs have been included in the MHHS Data Cleanse Working Group discussions. The Code Manager attends the monthly meetings and has provided regular updates there and at the Cross Code Steering Group.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**14-Jan-25**	**31-May-25**
	Code Manager initial assessment	January	January
	Solution Development	January	April
	Change Issues Group	April	April
	Impact Assessment	April	May
Change Proposal		**01-Jun-25**	**18-Aug-25**
	Business Case Assessment	June	June
	Consultation	June	July
	Final Determination	July	August
Voting		**19-Aug-25**	**19-Aug-25**
	Appeal Window	20-Aug-25	04-Sep-25

6 STAKEHOLDER ENGAGEMENT

This Issue was presented at the Change Issues Group in April for feedback on the Code Manager's proposed solution. The minutes for this meeting can be found here.

7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	1	27	27
	Retail Markets Impact	Innovation and Market Arrangements	0	17	0
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	1	14	14
Resource	Complexity / Effort / Duration		2	9	18
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	0	10	0
				Overall Priority Score (rounded)	73

Priority Status	LOW
Change Proposal Type	STANDARD

SOLUTION

8 PROPOSED SOLUTION

The proposed solution for this Change Proposal is to add in an obligation for Electricity Suppliers to send the Registration De-activation Request to the CSS, or raise a query on the Secure Data Exchange Portal (SDEP) with the relevant DNO if they believe the Metering Point should not be Disconnected, within 20 Working Days of receiving the notification of Disconnection from the Electricity Retail Data Agent (ERDA). Currently there is no timescale in the REC Schedule in which the Electricity Supplier must take these actions.

This is being added to section 4.1.8 of Schedule 27 – RMP Lifecycle.

The solution proposed at Party impact assessment also proposed the timescale for Gas Suppliers, but this has been removed following feedback from that impact assessment.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0191 can be found on the REC Portal.

- The changes in the pre-MHHS version of Schedule 27 can be found here.
- The changes in the post-MHHS version of Schedule 27 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 conducted from 03 to 29 April 2025. Two responses were received from Energy Suppliers, which have been published here.

ENERGY SUPPLIERS	• Both Energy Suppliers were supportive of the introduction of a 20 Working Day SLA in which Electricity Suppliers must take the actions outlined in section 4.1.8 of Schedule 27 – RMP lifecycle. One Energy Supplier fed back that this SLA should not be applicable to Gas as there are other actions that may need to be taken – the Code Manager has taken this feedback on board and reduced the solution to Electricity only. • The Code Manager asked a question about the lead time for any potential data cleanse activity but has since had confirmation from the REC Performance Assurance team this will not be required by them. One Energy Supplier has raised that a data cleanse may be required so these MPANs are not in scope of migration to MHHS, but the Code Manager has not included this in the scope of this solution. Energy Suppliers will need to manage this potential requirement with the MHHS programme. • One Energy Supplier confirmed they foresaw expected costs from the implementation of this Change Proposal to be less than £10,000; the other provided no comments. • Both Energy Suppliers confirmed they foresaw no lead time required for the implementation of this Change Proposal. • Both Energy Suppliers were supportive of this Change Proposal being implemented, with one providing the caveat they were supportive for Electricity only.

11 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

No risks, assumptions, issues or dependencies have been identified as part of this Change Proposal.

12 BUSINESS CASE ASSESSMENT

12.1 COSTS

There are no central systems costs associated with the implementation of this Change Proposal. The one respondent who confirmed they expected costs at impact assessment foresaw their costs as being under £10,000.

12.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
IMPROVED MONITORING OF ELECTRICITY SUPPLIER OBLIGATIONS BY REC PERFORMANCE ASSURANCE	The REC Performance Assurance team have confirmed they struggle to monitor the obligation for Electricity Suppliers set out in section 4.1.8 of Schedule 27 RMP Lifecycles. While this obligates Electricity Suppliers to send the Registration De-activation Request to the CSS or raise a query on SDEP with the relevant DNO if they believe the Metering Point should not be Disconnected, there is no timescale in which these actions must be taken. Performance Assurance may follow up with an Electricity Supplier where these actions have not been taken, but as there is no timescale in which they must be action there is no non-compliance. As such, there are currently ~40,000 MPANs (a reduction of the ~45,000 from December 2024) that are showing as Terminated but with an active Registration.
IMPROVED ALIGNMENT OF INFORMATION ACROSS THE ENERGY INDUSTRY	Introducing a timescale wherein the Electricity Supplier must send the Registration De-activation Request to the CSS or raise a query on SDEP with the relevant DNO if they believe the Metering Point should not be Disconnected will lead to improved alignment of information across the Energy industry and reduce the number of MPANs showing as Terminated but Energised. One Energy Supplier confirmed in their Party impact assessment response they saw this as a benefit on this Change Proposal.

12.3 COST BENEFIT ANALYSIS

There are no central system costs, the costs to impacted Party types are minimal and there are two intangible benefits associated with this Change Proposal. As such, the Code Manager believes there is a positive case for change.

13 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 minimal associated Party costs;
- Has proportionate effort required for implementation;
- Should allow improved monitoring and enforcement of the Electricity Supplier obligation set out in section 4.1.8 of Schedule 27 RMP Lifecycle; and
- Allow for improved alignment of information across the Energy industry.

14 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 20 June 2025 to obtain views on the Change Report (For Consultation). In total two responses were received from Energy Suppliers. The key themes from these responses have been summarised and set out below. The responses have been published here.

14.1 SUMMARY OF RESPONSE

The responses were overall supportive of the Change Proposed and believed it should be implemented.

14.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

One respondent agreed with the proposed solution and provided no further comments on the solution or legal text.

The other agreed with the proposed legal text and solution but suggested further changes. These included additional steps for DNOs to have to raise an SDEP query to Energy Suppliers on Energised sites with a meter still attached. The Code Manager has reviewed this and will not include this in the scope of this Change Proposal.

The Code Manager welcomes any Party raising a Change Proposal if they feel other aspects of the Code are not working. However, emergency Disconnections are required for a purpose, and there are many scenarios where it is valid for a DNO to disconnect a meter showing as energised and in place - e.g. fire. This would also likely need to be a cross-code change between REC, DCUSA and BSC.

14.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

Both respondents agreed with the Code Manager's assessment of the costs and benefits for this Change Proposal, and with the Code Manager's recommendation this Change Proposal should be subject to Self-Governance approval by the REC Change Panel. They also agreed with the Code Manager's recommendation that this Change Proposal should be recommended for implementation.

14.4 IMPLEMENTATION DATE AND APPROACH

Both respondents agreed with the proposed implementation approach of Big Bang.

One respondent agreed with the proposed implementation date of 07 November 2025. The other thought this Change Proposal should be implemented in the REC February 2026 release due to required system changes.

The Code Manager has taken this under consideration but do not see what system changes will be required as there is no change in the process, only the timescales in which the process needs to be done. Two Energy Suppliers responded at Party impact assessment and stated they needed no lead time for the implementation of this change. There is also an expectation a cleanse of this data may be required for MHHS migration.

15 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No amendments have been made following consultation.

16 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link – pre MHHS Link – post MHHS
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
CONSOLIDATED CONSULTATION RESPONSES	Link

17 GLOSSARY

TERM	DEFINITION
Central Switching Service (CSS)	means the Systems and processes provided or procured by the CSS Provider for the purpose of providing the Address Management Service and the Registration Service.
Disconnect	shall have the meaning given to that expression in the Electricity Supply Licence and the Gas Supply Licence; and Disconnection and similar expressions shall be interpreted accordingly.
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Electricity Retail Data Agent (ERDA)	means a provider of a DNO's Electricity Retail Data Service.
Electricity Supplier	means a person holding an Electricity Supply Licence.
Energise	shall have the meaning given under the DCUSA, and 'energised', 'energisation' and similar expressions shall be interpreted accordingly.
Meter Point X Number (MPxN)	means the collective description of the MPAN and MPRN when used together.
Secure Data Exchange Platform (SDEP)	means the portal of that name which forms part of the Secure Data Exchange Service.
Terminated	means the RMP Status indicating that an RMP is: (a) in the case of gas RMPs, no longer capable of offtaking gas; or (b) in the case of electricity RMPs, disconnected.