RETAIL ENERGY CODE

This document is classified as **Amber**.
Information is for public, unrestricted dissemination and publication.

NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0198 - METERING ASSET MANAGER (MAM) COMMUNICATION METHOD REGISTER

On 03 April 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for R0198.

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

DOCUMENT VERSION	1.0
RESPONSE TYPE	**NON-CONFIDENTIAL**
DATE ISSUED	04 June 2025
RESPONSIBLE COMMITTEE	REC Metering Expert Panel
LEAD ANALYST	Lydia Bentley

DATE IMPACT ASSESSMENT ISSUED	03 April 2025
RESPONSE DEADLINE	29 April 2025

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Metering Asset Manager Non-Confidential	Although we agree having a standard form of communication is a positive step, having a live register which is optionally updated may not be the most efficient method.	The Code Manager has since met with SSE and discussed their feedback with them directly. In order to meet a compromise, the Code Manager has modified the legal text in order to allow for users of the register to indicate that they would also be happy to engage with other Parties via established escalation contacts to resolve missed Market Messages.
Scottish Power Supplier Non-Confidential	We agree with the proposed solution to introduce two Communications Method Registers and that these registers are published on the REC portal, and made available to REC Parties, in order to support in the resolution of missed Market Messages. We are not clear on how initially this register will be populated. We suggest that all relevant REC parties are invited to complete their details on this register and REC team to collate all information initially and populate and publish the document on the REC portal as a starting point.	Thank you for your response. The Code Manager is proposing a February 2026 release, which provides a significant lead time in which the Code Manage can explore questions relating to pre-release partial completion of the register, and resolve questions relating to where and how it is hosted on the REC Portal.

Question 2:	Do you agree the proposed solution addresses the problem statement? If not, please provide details	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Metering Asset Manager Non-Confidential	No, keeping live registers will not resolve the issue of multiple communication methods being used as it does not address the risk relating to data quality issues and keeping the register updated.	Please refer to question 1. Following the discussion and the compromise on the legal text, the Code Manager acknowledges feedback from SSE that indicated that they still maintain their position as indicated in the response, but accept that the modified legal text is a positive step, and are grateful to the Code Manager for engaging, and understand that the solution is likely to please some, but not others.
Scottish Power Supplier Non-Confidential	Although we agree that the proposed solution, it is important that the register is initially populated by all REC parties, and it's maintained on the REC portal in order to address the problem statement.	Thank you – The Code Manager agrees and will consider these points as part of our release activities for R0198, assuming the Change is approved.

Question 3:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Metering Asset Manager Non-Confidential	No, it's very clear we need to reduce the communication methods used but due to complexity for the MAMs and their commercial relationships with the suppliers this change may be too onerous.	Please see responses to Q1 and Q2.
Scottish Power Supplier Non-Confidential	It makes sense to have a register on the REC portal, but it must be updated and maintained like other registers for example operational contact list to ensure it meet the needs of the problem statement.	Please see response to Q2.

Question 4:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Metering Asset Manager Non-Confidential	The legal text only mentions MAM's and Meter Installers having options to notify the REC of their preferred method with the option to update from time to time. This doesn't remove the issue of the multiple use of different communication routes.	Please see responses to Q1 and Q2.
Scottish Power Supplier Non-Confidential	Agree with the legal text, no further comments.	Thank you.

Question 5:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Metering Asset Manager Non-Confidential	SSE would require a minimal timescale, to implement this change. Assuming there is no reporting requirement on the supplier as per the legal text.	Thank you.
Scottish Power Supplier Non-Confidential	REC team should consider how long it will take them to collate relevant information from the REC parties before this register is published on the REC portal. Based on that the implementation date for this change should be agreed and set.	Please see response to Q2.

Question 6:	Are you aware of any constraints on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Metering Asset Manager Non-Confidential	No.	Thank you.
Scottish Power Supplier Non-Confidential	We suggest that the REC team should collate information from the REC parties prior to publishing this register. The process to collate all information should be initiated as soon as possible to determine when this change could be delivered.	Please see response to Q2.

Question 7:	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
SSE Metering Asset Manager Non-Confidential	Nil - assuming no requirement for reporting on suppliers.	Thank you.
Scottish Power Supplier Non-Confidential	Nil	Thank you.

Question 8:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Metering Asset Manager Non-Confidential	No	Thank you.
Scottish Power Supplier Non-Confidential	Having a communication register would really help suppliers to understand the communication method for MAMs and hopefully help to reduce some data mismatches.	Thank you.

Question 9:	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**
SSE Metering Asset Manager Non-Confidential	No.	Thank you.
Scottish Power Supplier Non-Confidential	Yes, we support the implementation of this change.	Thank you.

Question 10:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Metering Asset Manager Non-Confidential	Please be aware that many MAMs also use their own Web Portal, which can be used as a communication method in addition to those listed in the solution.	Thank you – The Code Manager has considered this but expects that this portal is likely to be outside the scope of the REC.
Scottish Power Supplier Non-Confidential	We have no further comments at this stage.	Thank you.