RETAIL ENERGY CODE

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

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

CHANGE REPORT

R0222 - ESME ID UPDATE REJECTIONS

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	MHHS M8
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Technical Expert Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	High	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	ERDA, DNOs		

LEAD ANALYST (SOLUTION LEAD)	SUBJECT MATTER EXPERT
LYDIA BENTLEY	LORNA MALLON
Click to send an email	Click to send an email

OVERVIEW

The Electricity Smart Meter Equipment (ESME) ID is a unique identifier that provides a designation for a Smart Meter. Electricity Retail Data Agent (ERDA) systems were updated as per the requirements in R0032 – 'New Registration data items and processes to support the transition to Market-wide Half-Hourly Settlement (MHHS)' to not allow for multiple incidences of an individual ESME ID to be registered, and reject the update, even when a second incidence of an ESME ID would be legitimate, for example in the case of a re-use of Metering Asset or a Crossed Meter. This Issue seeks to resolve this feature of the ESME ID validation while maintain data accuracy.

RESPONSIBLE COMMITTEE DECISION

On 26 June 2025, the REC Technical Expert Panel voted to:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of MHHS M8.

RETAIL ENERGY CODE

CONTENTS

1 Summary 3
2 Problem Statement 3
3 Impacts 3
4 Cross-Code Impacts 4
5 Proposal plan 4
6 Stakeholder Engagement 4
7 Priority Status and Urgency 5
8 Summary of Analysis Undertaken 6
9 Proposed Solution 6
10 Draft Legal Text 6
11 Summary of Impact Assessment Activity 7
12 Risks, Assumptions, Issues and Dependencies 8
13 Business Case Assessment 9
14 Case for Change 10
15 Summary of Consultation Responses 10
16 Summary of Amendments Made Following Consultation 11
17 Appendix 11
18 Glossary 12

BACKGROUND

1 SUMMARY

The ESME ID was introduced in R0032 and implemented in November 2022. More background information can be found in the Change Report for R0032. The issues underlying R0222 result from an unintended consequence of the implementation of the R0032 requirements

Where the ESME ID sent within a Market Message is subject to validation, the ERDA currently only permits for a single instance of an ESME ID to be used, and does not look for a meter removal. Validation is conducted at a Distributor level by ERDA; this results in a system where an ESME ID may only appear once in a Distribution Network Operator (DNO)'s portfolio, potentially resulting in unintentional consequences beyond the intended validation effects.

The inability to accept beyond a single ESME ID means that it is not possible, for instance, for a supplier to re-use a Metering Asset once removed in a different property, as the ID remains the same in the new property as the old. This results in both operational difficulties for the supplier.

2 PROBLEM STATEMENT

ERDA data validation on the ESME ID Data Item in the D0312(MM00256) Market Message is imperfect and can result in invalid rejections. This occurs when more than one incidence of an ESME ID is passed through individual ERDA system, as it only allows for a single occurrence, even if historic ones have been end-dated.

In situations where a Metering Asset has been re-used, thus re-using the ESME ID, a rejection will occur, as the result of an unintended functionality of the validation system.

3 IMPACTS

CONSUMERS
Smart Consumers

REC SERVICE PROVIDERS
ERDA

REC PARTIES AND SERVICE USERS
DNOs

REC DOCUMENTS / PRODUCTS
Data Specification DI51544

MHHS DESIGN
Indirect

MHHS DATA SPECIFICATION
IF-005

MHHS CODE DRAFTING
N/A

ERDA will be impacted directly as they carry out the ESME ID validation process. Suppliers and Meter Operator Agents will be impacted as Parties who receive the D0312 rejection Market Message containing the ESME ID rejection reason.

There is also an indirect impact on the MHHS Programme – whilst the R0222 solution options will not affect MHHS drafting, these validation errors need to be resolved quickly, as the ESME ID Data Item is used (and must be used accurately) in several planned MHHS processes.

Smart Consumers may be impacted as D0312 rejections may lead to inaccurate data being available via EES, including at the time of a Switch.

4 CROSS-CODE IMPACTS

The ESME ID Data Item is not changing, only how it is validated so no SEC impact is expected.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**04 Feb 25**	**31 May 25**
	Solution Development	Feb	March
	Legal Review	Feb	March
	Impact Assessment	Feb	May
Change Proposal		**01 May 25**	**24 June 25**
	Business Case Assessment	May	May
	Consultation	May	May
	Solution Refinement	June	June
	Final Determination	June	June
Voting		**25 June 25**	**25 June 25**
	Appeal Window	26 June 25	10 July 25

6 STAKEHOLDER ENGAGEMENT

The Code Manager has engaged (and will continue to do so), as needed, with industry as the Issue has developed. This Issue was discussed at the February 2025 REC Change Issues Group (CHIG) meeting in order to workshop the proposed solution options. The Issue will be discussed at future CHIG meetings, as required.

The Code Manager will also discuss this Issue at various other forums (such as the Technical Change Workshop, and the REC Issues Group (RIG)), on an as-needed basis.

RETAIL ENERGY CODE

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	2	27	53
	Retail Markets Impact	Innovation and Market Arrangements	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	0	14	0
Resource	Complexity / Effort / Duration		2	9	18
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		2	17	17
	Contribution to/ Alignment with RECCo's Forward Work Plan		1		8
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	2	10	20
				Overall Priority Score (rounded)	163

Priority Score	Priority Status
171 and above	Critical
151 to 170	High
101 to 150	Medium
0 to 100	Low

Priority Status	HIGH
Change Proposal Type	STANDARD

Urgent Change Proposals meet the Criteria for Urgency as set out by Ofgem

This Issue has been given a priority status of High, based on a score of 163. This score has been calculated on the basis of most metrics having been given a score of moderate impact/complexity/urgency. This reflects the substantial scale of change that this Issue seeks to deliver, as it will resolve unintended functionalities that impact systems affecting Consumers, the MHHS Programme, and multiple REC Parties and a Service Provider.

RETAIL ENERGY CODE

SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

The Code Manager has worked with the Metering Point Registration Services (MPRS) Provider, RECCo, MHHS Programme experts and the REC CHIG to develop a solution that addresses the problem statements and meets the data cleanse needs of the MHHS program.

The proposed solution will align the current ESME ID validation arrangements with the proposed arrangement for the MHHS program. Post-MHHS, ESME ID validation rules are found in the IF-005 (the post-MHHS equivalent of the D0312 in the Data Integration Platform) message specification; the proposed solution would apply this to ESME IDs relating to pre-MHHS and non-MHHS Metering Assets.

The Code Manager has ruled out changes to the "Number of Displayed Register Digits" Data Item (DI51600/J2313) as part of the scope of R0222. This is because progression of these changes within R0222 will extend the timescales of the Issue due, and any future outcomes can be achieved via a Change Request to be issued by the MHHS Programme.

9 PROPOSED SOLUTION

The Code Manager is proposing changes to the Data Specification to modify the Data Enumerations value list for the MOP Flow Response Code (DI51544/J2256) Data Item in order to align Code V with validation found in the MHHS program Interface Catalogue Data Item IF-005.

MOP Flow Response Code (DI51544/J2256): Enumeration V:

Current Drafting:

Rejected - ESME ID exists in MPRS. Not Removed Meter, Associated Import/Export MSID or Related MPAN

Proposed Drafting:

Rejected - ESME ID already live in MPRS on an Installed Meter MSN for an MPAN.

Tracked Changes:

Rejected - ESME ID already live in MPRS on an Installed Meter MSN for an MPAN. ~~and does Nnot match Removed Meter, Associated Import/Export MSID or Related MPAN.~~

The Code Manager expects that by retaining the removed elements of the enumeration ("Not Removed Meter, Associated Import/Export MSID ([Metering System ID]) or Related MPAN") in the MPRS validation rules, the alignment in the Data Specification to the MHHS IF-005 validation for Code V can be achieved with no loss of existing validation functionality.

The Code Manager will look to initiate conversations with the Balancing & Settlement Code on consequential changes to MPRS validation in parallel with the progression of changes to the Data Specification.

10 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0222 can be found here.

RETAIL ENERGY CODE

PRELIMINARY ASSESSMENT

11 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

11.1 SERVICE PROVIDER IMPACT ASSESSMENTS

The Code Manager conducted an Impact Assessment (IA) with the MPRS Provider between 27 March 2025 and 10 April 2025. The size and scope of the IA was determined during an initial IA conducted between 13 February 2025 and 20 February 2025.

MPRS PROVIDER	**System Changes** The MPRS Provider confirmed that they are able to make the required changes to the DI51544 Enumeration Code V, and that they can deliver these changes to DNO systems. This is inclusive of System & User Acceptance testing. MPRS also confirmed that industry testing is not required – This position was confirmed via informal discussions between the Code Manager and several DNO parties.
	Costs The MPRS Provider confirmed that they did expect to incur any central system costs as a result of delivering the proposed solution. Whilst they did identify some costs to deliver, these will be recovered as part of their standard contractual arrangements with DNOs, and as such are confidential. As these costs fall outside the scope of REC central systems, they have not been considered as part of this Change.
	Implementation The MPRS Provider confirmed that they will be able to deliver the proposed solution by the planned implementation date of MHHS Programme M10.

11.2 REC PARTY IMPACT ASSESSMENTS

The Code Manager did not identify a distinct DNO impact as delivery of the proposed solution will be supported as part of standard MPRS activities on behalf of DNOs. As such, no REC Party Impact Assessment was required, as there is no impact on any other REC Party.

RETAIL ENERGY CODE

12 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

12.1 RISKS AND ISSUES

NO.	RISK	NOTES	MITIGATION
1	If the IF-005 validation is not aligned to the proposed D0312 validation, changes to meters under MHHS could be rejected requiring significant work to resolve	Identified by the MPRS Provider.	Resolved – Proposed solution is to align D0312 validation with IF-005 validation.

12.2 ASSUMPTIONS AND DEPENDENCIES

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
1	MHHS Programme will be raising a MHHS CR to implement the IF-005 change	Identified by MPRS Provider	Validated – Code Manager will look to co-ordinate consequential MHHS CR to align with R0222 proposed solution.
2	MPRS validation rules will need to be updated to reflect the proposed solution.	Identified by the Code Manager	Validated – The Code Manager has confirmed that the MPRS provider will initiate conversations required with the BSC to update the MPRS Validation Rules document, as ownership of this document sits outside the REC.

NO.	DEPENDENCY	NOTES	STATUS
1	MHHS Programme M10 Timings	"If M10 is delayed, then R9.0 containing this change will be delayed, potentially holding up the availability of this validation change" – MPRS Provider	Open – This is dependency inherent to all REC Change whose delivery is linked to MHHS Programme gating.

13 BUSINESS CASE ASSESSMENT

13.1 COSTS

As reported in the MPRS Impact Assessment, there are no central system costs associated with the implementation of this Change. Whilst there are some costs associated with delivery of the changes to ERDS validation to DNOs, these will be absorbed by the existing DNO/MPRS costing arrangements.

13.2 BENEFITS

TANGIBLE BENEFITS

The Code Manager has not been able to identify any quantifiable/tangible benefits in association with the proposed solution to this Change but notes that ESME ID population is being monitored by the MHHS Programme and via REC Performance Assurance.

INTANGIBLE BENEFITS

BENEFITS	BENEFITS DESCRIPTION
MHHS PROGRAMME FACILITATION	The MHHS Programme needs “clean” data in order to facilitate the migration of MPANs. ESME ID validation issues result in mismatches occurring in copies of the ESME ID Data Item between different Parties. The proposed solution will prevent discrepancies from occurring, allowing the data to be cleaned more thoroughly ahead of the MHHS migration.
IMPROVED OPERATIONAL EFFICIENCY	Restrictive validation on MPRS presents issues for industry whereby legitimate subsequent records of an ESME ID within ERDS systems are rejected. The proposed solution will eliminate this unintended functionality and ensure that REC Parties are able to accurately log valid ESME ID incidences without fear of erroneous validation rejections.
IMPROVED CONSUMER OUTCOMES	As the ESME ID relates directly to Consumer Smart Metering equipment, issues relating to its usage within Market Messages may result in issues relating to Consumer data. As such, the proposed solution will result in enhanced accuracy within Consumer data relating to Smart Metering assets.

13.3 COST BENEFIT ANALYSIS

On the basis of no REC central system costs having been identified, weighed against a necessary and urgent need for improvements to EMSE ID validation to support planned MHHS Programme delivery, the Code Manager considers that the cost-benefit test for R0222 is met.

14 CASE FOR CHANGE

SELF GOVERNANCE

The Code Manager considers that there is a case for change to implement this solution, on the basis that it:

- Is both viable and implementable, and it appropriately resolves the problem statement; and
- Is cost effective and proportionate to the anticipated benefit.

15 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 01 May 2025 to obtain views on the Preliminary Change report. In total six responses were received from three DNOs, two Suppliers and one MAM. The key themes from these responses have been summarised and set out below.

15.1 SUMMARY OF RESPONSES

Of the six responses received, four were unconditionally supportive, and two were conditionally supportive. The conditionally supportive respondents were a MAM and a Supplier.

15.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

Four respondents supported the legal text in full. Two respondents supported the proposed changes to the D0312 validation but felt that the scope of the solution should be changed to expand the functionality of the existing validation. Both of these respondents reported that, in their view, the D0312 validation should be expanded to provide an MPAN against rejected ESME IDs to identify the Registrable Measurement Point against which the rejected ESME ID is currently associated with. One of these respondents also indicated that they would also support, as an alternative, the expansion of the Electricity Enquiry Service to allow searches against an ESME ID to identify MPANs. These respondents indicated that returning the MPAN associated with the rejected ESME ID would allow them to better resolve these rejections.

Whilst the Code Manager is sympathetic to this position and understands that REC Parties face challenges in resolving ESME ID rejections, the scope of this Change is limited only to aligning the D0312 validation as found in the DI51544 Data Item. In order to support the MHHS programme, D0312 validation must be aligned with IF-005 validation to permit the re-use of ESME IDs in specific instances where there is an effective-to date for MSNs associated with an ESME ID. To achieve this in time to support the planned data cleanse activities, it has been necessary to keep the scope of this Change limited to the functionality described above. Additional solution complexity would delay both the development time of the Change, and also the lead time required by MPRS to deliver the solution.

The Code Manager would encourage these respondents to raise a new Change where the proposed expansion to the D0312 validation can be explored. In this way, these proposals can be explored on their own merit, independent of the time constraints facing this Change on account of the delivery expectations imposed by planned data cleanse activities.

15.3 BENEFITS RELATIVE TO IMPLEMENTATION AND OPERATIONAL COSTS

Five of the six respondents agreed with the Code Manager's assessment of the costs and benefits associated with this Change. One respondent, the Supplier who raised concerns relating to the scope of the solution (as explored in section 15.2 of this document), did not agree with the benefits assessment. Their disagreement stemmed from their view that the proposed solution should be expanded to include additional functionalities. Whilst sympathetic to their position, the Code Manager would assert that the benefits case of this Change must be assessed on the basis of the existing scope rather than a proposed scope.

15.4 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

All respondents agreed with the Code Manager's assessment that the proposed solution constitutes a positive case for Change. Whilst some respondents did identify (as reported earlier) perceived issues with the proposed solution, all respondents did agree that the core solution of this Change is required and is positive, notwithstanding caveats.

15.5 IMPLEMENTATION DATE AND APPROACH

All respondents supported the Code Manager's proposed implementation date and approach. One respondent did modify their support by stating that the implementation date and approach should be conditional on approval of any required consequential change by the BSC. The Code Manager has confirmed that this will be the case, as referenced in assumption two in section 12.2 of this document.

16 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

The Code Manager consulted on an implementation date of MHHS M10. However, following consultation, the Code Manager changed the implementation date to MHHS M8. This is based on feedback from the programme that date is more appropriate in the context of planned data cleanse activities. As M8 and M10 are functionally the same data, the Code Manager has not taken this Change back to consultation, as it is not felt that the change in implementation date is material enough to warrant this.

This was discussed at the REC Technical Expert Panel on 25 June 2025, who voted to approve the implementation date on the proviso that the Code Manager draw specific attention to this change in implementation date in the Change Report.

17 APPENDIX

CHANGE PROPOSAL	Link
RELATED CHANGE – R0032	Link
LEGAL DRAFTING	Link
CONSOLIDATED CONSULTATION RESPONSES	Link

18 GLOSSARY

TERM	DEFINITION
Data Item	means the most granular level of data defining a specific attribute in respect of a data type, the permissible values for which are defined and controlled in the Data Item Catalogue.
DNO	means a person holding an Electricity Distribution Licence.
Crossed Meter	means that a meter installed at a Consumer's premises is associated to an RMP for another premises.
ERDA	means a provider of a DNO's Electricity retail data service.
Market Message	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
Metering Asset	shall have the same meaning as Metering Equipment.
MOA	means a Party which has Qualified in that role under the Qualification and Maintenance Schedule. Where used in respect of a particular Metering Point, it means the MOA Appointed by an Electricity Supplier in accordance with the Metering Operations Schedule. The MOA is accountable for the installation, replacement, repair and maintenance of electricity Metering Equipment (either itself or by an EMO), and the MOA must also therefore be Accredited under the Metering Accreditation Schedule.
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Switch	means a change to the Registered Supplier for an RMP.