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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0222 - ESME ID UPDATE REJECTIONS

On 01 May 2025, the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0222 - ESME ID Update Rejections.

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	18 June 2025
RESPONSIBLE COMMITTEE	TECHNICAL EXPERT PANEL
LEAD ANALYST	LYDIA BENTLEY

DATE CONSULTATION ISSUED	01 May 2025
RESPONSE DEADLINE	23 May 2025

Question 1:	Do you agree with the proposed solution? If not, please explain why	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid Distribution Network Operator	Yes	Thank you.
Scottish Power Energy Networks Distribution Network Operator	Yes	Thank you.
EDF Energy Metering Equipment Manager	A change in validation, as described, is certainly welcomed to allow an ESME ID to be used against another MPAN. Unfortunately, MEMs will still be without necessary information (MPAN associated with the ESME ID) to efficiently resolve the rejection code V when it is received, and therefore will be unable to effectively utilise the validation changes. I understand that the decision to omit changes to the D0312 rejection flow is due to the "pressing need to get this validation in place by MHHS 10, as the ESME ID must be cleansed as part of the MHHS transition", but REC need to consider that the cleanse will not be able to be carried out efficiently if the associated MPAN detail is not provided.	The Code Manager acknowledges this feedback and recognises that challenges remain surrounding the D0312 rejection functionality. A decision was taken to keep the scope of R0222 narrow, only considering alignment with the IF-005 (the post-MHHS equivalent of the D0312) in order to deliver changes needed to support the MHHS data cleanse. However, this does not limit potential future change, and the REC Code Manager is open to a Change being raised to consider supplementary amendments to D0312 validation functionality in the future.

Question 1:	Do you agree with the proposed solution? If not, please explain why	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
	If the change is implemented, as described (without the rejection reason text containing MPAN information associated with the ESME ID) can REC confirm if there is scope to consider this in future changes? In summary, I support the proposed validation change, but believe the decision to exclude the associated MPAN from the D0312 rejection flow does not allow for efficient resolution to the rejection code V when received.	
National Grid Electricity Distribution Distribution Network Operator	We are supportive of the proposed solution as this will align the validation rules of the D0312 with those within the IF-005.	Thank you.
SSE Energy Supply Ltd Energy Supplier	Yes, SSE agrees with the proposed solution	Thank you.
Eon Next Energy Supplier	The proposed wording for the DI51544/J2256 is certainly clearer than the current wording and we agree with aligning the current ESME ID validation arrangements with the proposed arrangement for the MHHS program is the correct course of action. However, it will only address the issue of an EMSE ID being legitimately re-used if an effective to date is entered. If the EMSE ID does not have an effective to date, as there's no functionality in ECOEs to search via EMSE ID, upon receiving a rejection, we would still not be to identify the MPAN or supplier to contact to request their EMSE be ended. We would still need to set the EMSE to defaults in order to ensure a meter exchange is recorded in the system.	The Code Manager acknowledges this feedback and recognises that challenges remain surrounding the D0312 rejection functionality. A decision was taken to keep the scope of R0222 narrow, only considering alignment with the IF-005 (the post-MHHS equivalent of the D0312) in order to deliver changes needed to support the MHHS data cleanse. As such, this additional functionality

Question 1:	Do you agree with the proposed solution? If not, please explain why	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
	We believe that more commonly an ESME ID is entered incorrectly rather than Reused.	will not be considered as part of the R0222 solution. However, this does not limit potential future change, and the REC Code Manager is open to a Change being raised to consider supplementary amendments to D0312 validation functionality in the future.

Question 2:	Do you agree with the proposed implementation approach? If not, please explain why	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid Distribution Network Operator	Yes	Thank you.
Scottish Power Energy Networks Distribution Network Operator	Yes	Thank you.
EDF Energy Metering Equipment Manager	No comments	Thank you.
National Grid Electricity Distribution Distribution Network Operator	Whilst we agree with the implementation approach for this REC R0222 we would seek assurance that any consequential changes to the BSC would be aligned with any proposed implementation date.	Thank you – The Code Manager is working with the MPRS Provider in order to ensure that consequential BSC changes are managed.
SSE Energy Supply Ltd Energy Supplier	Yes, SSE agrees with the proposed implementation approach	Thank you.
Eon Next Energy Supplier	We have no comments in implementation approach.	Thank you.

Question 3:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid Distribution Network Operator	Yes	Thank you.
Scottish Power Energy Networks Distribution Network Operator	Yes	Thank you.
EDF Energy Metering Equipment Manager	No comments	Thank you.
National Grid Electricity Distribution Distribution Network Operator	Whilst we agree that there would be no costs to the REC, we would have to obtain confirmation from our service provider of any potential cost implications in respect of system changes which may be required.	
SSE Energy Supply Ltd Energy Supplier	SSE agrees there are no costs to implement this change.	Thank you.
Eon Next Energy Supplier	No, we do not agree with the benefits assessment. The implementation of this solution will not entirely prevent discrepancies occurring entirely. If an ESME ID has been re-used and no effective date or the EMSE ID has been attached to the incorrect meter, default values will still need to be used in order to update a meter exchange.	Please refer to response from Q1. As the scope of this Change does not include the functionalities requested, the benefits case will have a respective scope.

Question 4:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the REC Technical Expert Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid Distribution Network Operator	Yes	Thank you.
Scottish Power Energy Networks Distribution Network Operator	Yes	Thank you.
EDF Energy Metering Equipment Manager	No comments	Thank you.
National Grid Electricity Distribution Distribution Network Operator	We believe that the Code Managers assessment is reasonable.	Thank you.
SSE Energy Supply Ltd Energy Supplier	Yes, SSE agrees with the proposed change path.	Thank you.
Eon Next Energy Supplier	Yes, we agree.	Thank you.

Question 5:	**Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation to align with MHHS M10? If not, please explain why.**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid Distribution Network Operator	Yes	Thank you.
Scottish Power Energy Networks Distribution Network Operator	Yes	Thank you.
EDF Energy Metering Equipment Manager	I understand the need for this, but as explained in section 1 above the rush to implement without additional information to MEMs in the D0312 flow will delay the resolution and cleanse required.	Please see response to Q1.
National Grid Electricity Distribution Distribution Network Operator	Whilst we agree with the proposal to align the implementation date with M10, this would be subject to any consequential changes being raised within the BSC also being aligned to this date. This is also subject to the dependency noted within the change proposal document regarding MHHS programme M10 timings.	Please see response to Q2.
SSE Energy Supply Ltd Energy Supplier	Yes, SSE agrees this change should align to MHHS M10.	Thank you.
Eon Next Energy Supplier	Yes, we agree.	Thank you.

Question 6:	Do you agree that the proposed solution constitutes a positive case for change? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid Distribution Network Operator	Yes	Thank you.
Scottish Power Energy Networks Distribution Network Operator	Yes	Thank you.
EDF Energy Metering Equipment Manager	I do agree, but again, the solution does not consider the required data for MEMs to resolve the issue when a rejection is received. The effort of work to locate the associated MPAN that is causing the issue, in order to resolve the rejection would be greatly reduced if this information could be provided in the D0312 rejection flow.	Please see response to Q1.
National Grid Electricity Distribution Distribution Network Operator	We are supportive of the proposed solution as this will align the validation rules of the D0312 with those within the IF-005 and therefore agree that this constitutes a positive case for change	Thank you.
SSE Energy Supply Ltd Energy Supplier	We are not aware of this being a large issue but support any change that reduces unnecessary rejections	Thank you.
Eon Next Energy Supplier	Yes, we agree.	Thank you.

Question 7:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid Distribution Network Operator	N/A	Thank you.
Scottish Power Energy Networks Distribution Network Operator	No other comments	Thank you.
EDF Energy Metering Equipment Manager	No comments	Thank you.
National Grid Electricity Distribution Distribution Network Operator	N/A	Thank you.
SSE Energy Supply Ltd Energy Supplier	No further comments	Thank you.
Eon Next Energy Supplier	As we have said above this won't eliminate mismatches on ESME ID where an ESME ID has not been ended correctly or the EMSE has been attached to the incorrect meter. We will still have to use workarounds for these scenarios, and we believe these happen more frequently than an EMSE ID being reused.	Please see response to Q1.