RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	Final Recommendation

CHANGE REPORT

I0228 ECOES API FOR EXPORT MPAN CREATION AT SCALE

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	TBD
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Technical Expert Panel	CHANGE PATH	Self-Governance
PRIORITY STATUS	Medium	URGENCY	Standard
IMPACTED STAKEHOLDERS	Electricity Suppliers, DNOs, EES		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

Electricity Suppliers believe there is a significant bottleneck to Export Metering Point creation, which is resulting in them feeling unable to offer Export smart products to a wider audience of Consumer and scale low-carbon technology. The most effective solution is an API within the Electricity Enquiry Service (EES) that allows the Electricity Supplier to request the creation of an Export Metering Point. This could work for both Electricity Suppliers and Distribution Network Operators (DNOs) ensuring that scalable solutions are applied at both sides of the process.

RESPONSIBLE COMMITTEE DECISION

On **21 April 2026,** the REC Change Panel voted to, in line with the Code Manager recommendation:

- **APPROVE** the Proposal Plan, including the Responsible Sub-Committee, Change Path, Priority Status, Urgency and timetable.

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BACKGROUND

1 SUMMARY

REC Schedule 27 – RMP Lifecycle outlines that 'Any request for 50 or more Export Metering Point per Electricity Supplier per day will be deemed to be a bulk request, and as such will be subject to a bi-lateral agreement between the Electricity Supplier and the relevant Distribution Network Operator.

The Proposer for this Issue identified a key issue with this process in that the growing number of Consumers with or wishing to install microgeneration infrastructure means that this restriction of 50 is overly burdensome. They have also identified that no two DNOs are operating this process in the same way, causing unnecessary time to be added to the process for Electricity Suppliers.

The Proposer has asked the Code Manager to explore the creation of an API to streamline this process. They would also like to discuss increasing or removing the limit before it becomes a bulk request.

The Proposer has also raised R0321 DNOs Create Export MPANs for new housing developments, removing Export Metering Point creation specifically for large new development Sites from the business case of I0228. If it is determined the solution proposed for new development Sites under R0321 cannot be progressed, new development Sites will be added back to into the business case for I0228.

2 PROBLEM STATEMENT

A restriction of 50 Export Metering Points per DNO per day, with no two DNOs operating the bulk request process in the same way, is overly burdensome to Electricity Suppliers and creating a barrier for Consumers getting an Export Metering Point assigned to their Premise. This is ultimately harming the effort the reach Net Zero.

3 IMPACTS

CONSUMERS
Electricity Consumers

REC SERVICE PROVIDERS
EES Provider

REC PARTIES AND SERVICE USERS
Electricity Suppliers
DNOs

REC DOCUMENTS / PRODUCTS
TBD

MHHS
There are no expected impacts to MHHS from this Issue.

4 CROSS-CODE IMPACTS

There are no cross-code impacts identified with this Issue.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**02 Apr 26**	**15 Jun 26**
	Information Request	April	May
	Business Case Assessment	May	June

The Code Manager is submitting a plan covering an Information Request and Business Case Assessment only. This is to establish if there is a long-term use case for the proposed API, before proceeding with solution development and Service Provider impact assessment.

A further plan will be submitted if it is established this use case is long-term.

6 STAKEHOLDER ENGAGEMENT

A call was held with DNOs on 18 February 2025, and this Issue presented at the Change Issues Group on 06 March 2025. The minutes for the discussion at Change Issues Group can be found here.

This Issue was then required to be put on hold, due to MHHS and it's impacts to the EES.

6.1 DNO INPUT CALL

In February 2025, a call was held with DNOs to get their input into this REC Issue.

The primary feedback from DNOs was that they did not see an issue with the process as it currently exists, as they are currently not receiving any negative feedback from Electricity Suppliers. From their perspective, the restriction that means an Electricity Supplier must raise up to 50 manual requests to create Export Metering Points is a positive, because it allows the DNO to ensure that the request has all the necessary data provided (such as the Microgeneration Certificate). Removing this restriction therefore would mean that there was less oversight of potential Metering Points being registered, which may cause adverse effects.

There was an additional discussion about whether this issue will be long-term or whether we are currently in a backlog situation as Electricity Suppliers are creating more Export Metering Points than usual for Consumers previously on the Feed-In-Tariff (FIT) Scheme and once these have all been created in the next few years, the numbers will become more manageable.

Lastly, there a discussion around the provision of additional information, particularly the Microgeneration Certificate, with some DNOs not requiring this from the Electricity Supplier and going directly to the Consumer for this information, some requesting it from the Electricity Supplier via email and some from the Electricity Supplier via the Secure Data Exchange Platform (SDEP). The Proposer has asked the Code Manager to additionally investigate standardising the process for DNOs requesting additional information from the Electricity Supplier.

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	1	14	14
Resource	Complexity / Effort / Duration		1	9	9
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	0	10	0
				Overall Priority Score (rounded)	148

Priority Status	MEDIUM
Change Proposal Type	STANDARD

8 APPENDIX

CHANGE PROPOSAL	Link
RELATED CHANGE(S)	R0321 DNOs Create Export MPANs for new housing developments
ANY OTHER DOCUMENTS	Change Issues Group paper: presented March 2025.

9 GLOSSARY

TERM	DEFINITION
Consumer	means any person supplied (or seeking a supply) of Energy at an RMP (whether or not that person also exports or is seeking to export electricity at an RMP).
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Electricity Enquiries Service (EES)	means the service described as such in the EES Service Definition.
Electricity Enquiry Service Provider	means the provider of the Electricity Enquiry Service.
Electricity Supplier	means a person holding an Electricity Supply Licence.
Export Metering Point	means a Metering Point which identifies exports from a Location.
Premises	is to be interpreted in accordance with the Gas Act and the Electricity Act.
Sites	unless stated otherwise means the area around which the Metering Point is located, in respect of the relevant meter(s) in relation to which a MEM has been appointed to perform meter operation services.