RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0251 – AMENDMENT TO THE BUSINESS CASE FOR R0044

On 18 July 2025 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0251.

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	06/08/25
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Holly Law

DATE CONSULTATION ISSUED	18/07/2025
RESPONSE DEADLINE	01/08/2025

Question 1:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	Yes, we agree with the Code Managers review of these costings. The Code Manager believes the benefits of this change outweigh the costs. During SIT it was discovered that new functional requirements emerged, revealing that additional work was needed—thus invalidating the original business case.	Noted, thank you.
ScottishPower Energy Retail Limited (Energy Supplier)	We agree with the Code Manager's assessments of the associated costs and benefits of the proposed change recognising its importance in facilitating the smooth implementation and take-off of the MHHS programme. However, we note that although the projected cost increase may not be substantial, it is our view that the Business Case should have been updated to reflect the specific additional requirements identified by the CSS provider. Inclusion of these new requirements within the Business Case would have provided parties with a clearer and more comprehensive view, enabling a more accurate evaluation of the associated costs and implications. As parties contribute financially for these services, it is both reasonable and necessary that we are presented with complete information regarding planned activities and ay subsequent changes.	As part of the MHHS related changes made to CSS under R0044 the RegistrationEventSynchronisation message was amended to include the MDR appointment as well as the MEM in the Supplier Arranged Appointments array when being sent to the DSP. There is an existing mechanism in the Central Switching Service to allow the DSP to request a refresh of RegistrationEventSynchronisation messages (error code 4998) via the CSS Errors API. This re-sent message was found to not include the MDR appointment, only the MEM – this development is to request the MDR to be added to the SAA array in the

		RegistrationEventSynchronisation message sent to the DSP in response to a 4998 code submitted to the Errors API. The Errors API and all associated documentation be updated to reflect this change.
SSE Energy Supply Limited (Energy Supplier)	Yes, we agree with the assessment.	Noted, thank you.
Scottish Power Energy Networks (DNO)	We have no view on the actual costs, as this is not information that we are party to, however if there has been changes to costs included in previous impact assessments, we believe the correct process is to have these amended to reflect the accurate position.	Noted, thank you. The Service Provider costs are included in the business case assessment in the Final Change Report for R0044 MHHS Programme Changes required to Central Switching Service.

Question 2:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on the date of approval by the Change Panel? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	Yes, we agree as this change is an update to the business case of an already approved change.	Noted, thank you.
ScottishPower Energy Retail Limited (Energy Supplier)	We agree with the Code Manager's recommendation.	Noted, thank you.

SSE Energy Supply Limited (Energy Supplier)	Yes, we agree with the recommendation that this change proposal should be approved.	Noted, thank you.
Scottish Power Energy Networks (DNO)	We have no issue with the implementation process or date.	Noted, thank you.

Question 3:	Do you have any other comments relating to this Change Proposal ?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	Nothing further to add.	N/A
ScottishPower Energy Retail Limited (Energy Supplier)	No comments.	N/A
SSE Energy Supply Limited (Energy Supplier)	Our firm view is that it is far too late to revisit R0044 and establish an alternative design, especially as R0044 is due for implementation at MHHS Milestone M8, which is in September 2025. Implementation of the Meter Data Retrieval service role under the new MHHS arrangements cannot be put at risk, which would then be likely to impact the MHHS overall timelines. The £81k cost quoted is very small in comparison to the overall costs incurred by all parties for the MHHS	Noted, thank you.

	Programme, and any costs or delays as a result of this change proposal not being approved are likely to be much higher than £81k.	
Scottish Power Energy Networks (DNO)	No further comments	N/A