RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0256 MM00023 /D0135 - ASSET CONDITION REPORT CLARIFICATION OF INTENT ON R0021/R0101

On 11 July 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0256 MM00023 /D0135 - Asset Condition Report clarification of intent on R0021/R0101.

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

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RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	13 August 2025
RESPONSIBLE COMMITTEE	Technical Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	11 July 2025
RESPONSE DEADLINE	01 August 2025

Question 1:	Do you agree with the assessment of the Metering Expert Panel and Code Manager that the Scenario Variants for SIP, CMRM, Advanced Metering Service and Smart Metering Service should all be amended to match that of the MOA? If you believe any of these Scenario Variants should be de-scoped, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
IMServ (Metering Equipment Manager)	Where party are is acting in a similar role to the MEM then it is logical that the D0135s they send should include the 60H group. For example a Crowded Meter Room MEM (CMRM) or Safe Isolation Provider (SIP) will pull fuses to DeEnergised metering systems and therefor have appropriate knowledge and necessary experience with the issues listed in the Asset Condition Codes (J1824). However, if the industry party is a meter reader who will never pull the fuses, then the Asset Condition Codes (J1824) will have little or no meaning for those agents. The role of the ADS/SDS at site differs significantly from that of the MEM. The ADS will Report Possible Safety Problems with a D0135. When submitting a D0135, the ADS SVA will use the Additional Information field to provide context and justification for its use. This information should typically be sufficient to determine whether further action is required. Making 60H mandatory for the Meter Reading Service, Smart Data Service, Advanced Data Service roles would require considerable effort, system changes and add little or no value, it's also possible asking under qualified agents to populate the 60H group might result in	Thank you for your comment. This Change Proposal proposes to make changes to the Scenario Variants for the Advanced and Smart Metering Services, not the Advanced and Smart Data Services. The Code Manager has reached out to IMServ to confirm this, and received confirmation IMServ have no concerns with this Change Proposal if Data Services are not in scope.

	inaccurate reports being sent to SFIC, and result in unnecessary and costly site visits for LDSOs.	
National Grid Electricity Distribution (Distribution Network Operator)	We are happy with the assessment of the Metering Expert Panel and Code Manager, and agree that SIPs, CMRMs, Advanced Metering Services and Smart Metering Services should act in the same manner as MOAs when sending D0135 flows therefore the Scenario Variants should be amended in order to match for all of the above parties.	Thank you for your comment.
SSE (Energy Supplier)	SSE agrees with the assessment of the Metering Expert Panel and Code Manager that the Scenario Variants should match MOA across all parties.	Thank you for your comment.

Question 2:	Do you have any comments on the proposed red-lining of the Data Specification?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
IMServ (Metering Equipment Manager)	As above, we believe that mandatory population of the 60H group is only required for parties who are working on the Service Termination Equipment (cut-outs).	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	No comments.	Thank you for your confirmation.
SSE (Energy Supplier)	SSE has no comments to add on the red lining.	Thank you for your confirmation.

Question 3:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
IMServ (Metering Equipment Manager)	No, not all parties need to send the 60H group, mandating population for all parties adds no value, it would be expensive, and drain valuable IT resource at a time when the focus should be on MHHS.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes. We agree that amending the Scenario Variants of the SIP, CMRM, Advanced Metering Service and Smart Metering Service in the D0135 flow, to match that of the MOA and align their requirements, will allay any possible confusion that might have otherwise been caused.	Thank you for your comments.
SSE (Energy Supplier)	Yes, SSE agrees the proposed solution addresses the problem statement.	Thank you for your comments.

Question 4:	Do you think we have identified and considered all processes and scenarios that may be impacted through the implementation of the proposed change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
IMServ (Metering Equipment Manager)	No, we believe there's a gap/difference for services which involve manual on-site meter reading.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we believe so.	Thank you for your comments.
SSE (Energy Supplier)	There does not appear to be a scenario variant for D0126 from the Supply fault information centre to the CMRM	Thank you for your comments. The Code Manager will not progress this under this Change Proposal as it relates to a different Market Message, but will raise a separate Change Proposal for this.

Question 5:	Do you believe the solution appropriately accounts for the industry's move to the new MHHS arrangements whilst the industry manages both MHHS and non-MHHS Metering Points?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
IMServ (Metering Equipment Manager)	We agree that parties who are working on Service Termination Equipment should send the 60H group, but mandating this change for roles who are not working on Service Termination Equipment would be detrimental to MHHS as valuable resource would need to be redirected	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, the industry's move to the new MHHS arrangements appear to have been appropriately considered.	Thank you for your comments.
SSE (Energy Supplier)	Yes. SSE agrees that the solution covers both the new MHHS arrangement and non MHHS metering point.	Thank you for your comments.

Question 6:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
IMServ (Metering Equipment Manager)	If the Meter Reading Service, Smart Data Service, Advanced Data Service roles must send the 60H group (the proposal as it stands) then our estimate is 2 years due to other MHHS commitments. If the Meter Reading Service, Smart Data Service, Advanced Data Service roles are excluded then it would be 3 to 6 months.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	At this stage we believe there would be little (if any) action that we would need to take to implement this change therefore minimal lead-time. However, should this change proceed to consultation, we will assess again and report any alternative findings accordingly.	Thank you for your comments.
SSE (Energy Supplier)	None required.	Thank you for your comments.

Question 7:	Do you foresee any risks to your qualification or migration plans to be delivered as part of MHHS implementation caused by the delivery of this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
IMServ (Metering Equipment Manager)	Yes we do, mandating the 60H group for the site visit agents (meter readers) software and other applications will need to be redeveloped so Asset Condition Codes can be reported.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	No, we do not expect this change to affect our MHHS Qualification/Migration plans.	Thank you for your comments.
SSE (Energy Supplier)	No.	Thank you for your comments.

Question 8:	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**
IMServ (Metering Equipment Manager)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	At this stage we believe there would be little (if any) action that we would need to take to implement this change so any costs incurred would be minimal. Therefore, erring on the side of caution, we would suggest B) Up to £9,999	Thank you for your comments.
SSE (Energy Supplier)	A) Nil	Thank you for your comments.

Question 9:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
IMServ (Metering Equipment Manager)	There are no benefits that we can see	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Not directly, however we agree that alignment in how the named parties act when sending D0135 flows will alleviate any potential confusion going forward.	Thank you for your comments.
SSE (Energy Supplier)	It will allow the SIP and the CMRM to report issues on site.	Thank you for your comments.

Question 10:	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**
IMServ (Metering Equipment Manager)	No, the change should not proceed in its current format.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree that this change should be made.	Thank you for your comments.
SSE (Energy Supplier)	Yes, SSE agrees that the change should be made.	Thank you for your comments.

Question 11:	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**
IMServ (Metering Equipment Manager)	Once again, if the agent is pulling fuses to DeEnergised metering systems they will have the appropriate knowledge and necessary experience to identify problems and select the correct Asset Condition Codes (J1824). If the agent is not pulling fuses then they won't have the necessary experience, the Asset Condition Codes is not relevant to their task, and instead they should use Site Visit Check Codes (J0024) which have been designed for their skill level.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	No further comments.	n/a
SSE (Energy Supplier)	No	n/a