RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0261 ADDITION OF EXPORT FLAG IN D0303 FLOWS

On 16 January 2026 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0261 Addition of Export flag in D0303 flows.

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
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RESPONSIBLE COMMITTEE	Technical Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	16 January 2026
RESPONSE DEADLINE	06 February 2026

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
IMServ (Metering Equipment Manager)	Making structural changes to the D0303 affects both MHHS (MSS, MSA) and Legacy (HH, NHH) markets, and as we are doing this to add a data item which already exists in EES (but doesn't exist in MOP Legacy systems), the expression 'sledgehammer to crack a nut' seems very appropriate for this change. Considering that EES holds the master Import/Export data from when MPANs are registered whereas the data held by the MOP would be recycled, and for Legacy MPANs it would be assumed from other data items, obtaining the data from the 'source', i.e. EES would be a better way to ensure quality/accuracy.	Thank you for your comments. The Code Manager is liaising with the Proposer regarding making changes to the solution which would make the group optional for non-MHHS MPANs to limit the impact to Legacy MOAs systems. The Data Item is proposed as only mandatory for MHHS MPANs, so legacy MOAs would not be required to populate it.
ScottishPower Energy Retail (Energy Supplier)	As a supplier, we do not see a direct benefit from this change; however, we acknowledge the advantages it may bring to wider industry participants and recognise the challenges currently faced by MAPs. We recommend exploring alternative methods of communication between MOPs and MAPs to avoid unnecessary costs across the industry.	Thank you for your comments. This has undergone an Information Request, been discussed by the Community of MAPs (CMAP) and at the REC Change Issues Group. The Code Manager is confident with the engagement received via these forums.
Octopus Energy (Energy Supplier)	No, we agree that adding the Export Flag to the flow would be sensible option. Our MEM currently has internal work arounds to combat this as it can cause delays in held flows and held finance as the flow wasn't for	Thank you for your comments.

	a Primary/Imp not meter. Adding the data to the flow would improve the process.	
SMS Energy (Metering Equipment Manager)	No, we believe the comments we provided in our Information Request have been considered in this proposed solution.	Thank you for your comments.

Question 2:	Do you agree that the new Data Item should be placed in a new group at the bottom of the Market Message, rather than editing an existing group within the Market Message?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
IMServ (Metering Equipment Manager)	Neither, export shouldn't be added to the D0303 at all.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	Given that the data item is optional, positioning it within a new group at the end of the market message is the most suitable approach. This maintains the existing message design and supports clear, straightforward implementation for Parties.	Thank you for your comments.
Octopus Energy (Energy Supplier)	Don't have a strong preference on this	Thank you for your comments.
SMS Energy (Metering Equipment Manager)	This would be logical if the new line were 0–1, as D0303s issued under legacy settlement arrangements would then only require a version-number update rather than a full format change. We have expanded on this point in our response to question 7.	Thank you for your comments. The Code Manager is liaising with the Proposer regarding this suggestion.

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)	MAPs may use the data if it was available in the D0303, although to ensure accuracy would checks still be necessary to ensure that the D0303 export flag sent by MOPs matches the export flag held in EES?	Thank you for your comments. It will be for MAPs to determine their own operational practises, but as the Direction of Energy Flow is available in the IF-036 for MOAs received from the SMRS, the Code Manager expects it will be directly populated from here.
ScottishPower Energy Retail (Energy Supplier)	Although we agree that the proposed solution for REC Issue I0261 “Addition of Export Flag in D0303 Flows” addresses the concerns previously raised by MAPs, our preference would be for alternative options to be explored for communicating this information between MOPs and MAPs. This would help ensure that any solution adopted avoids unnecessary implementation costs for wider industry parties.	Thank you for your comments. This has undergone an Information Request, been discussed by the Community of MAPs (CMAP) and at the REC Change Issues Group. The Code Manager is confident with the engagement received via these forums.
Octopus Energy (Energy Supplier)	Yes, we agree this would help address the issue	Thank you for your comments.
SMS Energy (Metering Equipment Manager)	Yes.	Thank you for your comments.

Question 4:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
IMServ (Metering Equipment Manager)	Yes, the export flag could be accessed/extracted from the source data i.e. EES (Solution Option 4)	Thank you for your comments. The Proposer has elected to progress this solution option, but the Code Manager will keep this in mind when making a recommendation.
ScottishPower Energy Retail (Energy Supplier)	We consider it essential that alternative solutions are explored through the working group forum. Existing communication tools such as SDEP or an industry-system flag should be evaluated alongside the proposed approach. A comprehensive cost-benefit analysis must be undertaken before any amendments are made to the current data flow.	Thank you for your comments. This has been discussed at Change Issues Group, but there are no plans by the Code Manager to stand up a bespoke working group. If ScottishPower feel strongly about the use of SDEP as an alternate solution, the Code Manager would encourage them to raise an alternate Change Proposal.
Octopus Energy (Energy Supplier)	n/a	Thank you for your comments.
SMS Energy (Metering Equipment Manager)	While we recognise the value of API access into EES, we also consider the solution outlined in this IA to have greater longevity under MHHS	Thank you for your comments.

	arrangements, as it utilises an existing Data Flow between parties and avoids the need for MAPs to alter their EES data access arrangements.	

Question 5:	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)	We don't think impact to legacy systems has been explored thoroughly, for example will MOPs be able to make the necessary D0303 changes when development of legacy systems has likely been frozen and focus is on MHHS Qualification and Live operations. Also, what rules will MOP use to identify legacy Export MPANs?	Thank you for your comments. The Code Manager is liaising with the Proposer regarding making changes to the solution which would make the group optional for non-MHHS MPANs to limit the impact to Legacy MOAs systems. The Code Manager expects MOAs to be able to tell which MPANs within their portfolio have migrated to the MHHS arrangements and which have not due to the different appointment processes.
ScottishPower Energy Retail (Energy Supplier)	We agree that all processes and scenarios potentially affected by the proposed change have been fully identified and reviewed.	Thank you for your comments.
Octopus Energy (Energy Supplier)	Yes	Thank you for your comments.
SMS Energy (Metering Equipment Manager)	Yes	Thank you for your comments.

Question 6:	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)	From a MAP perspective, this change might be more straightforward, but as a MOP, we are operating with two distinct processes and applications. Any changes to legacy systems are more difficult due to development freezes, but also the benefit from this development is temporary i.e. until MHHS migration is fully complete, and which point legacy will be discarded. Should this be approved, there must be sufficient time allowed for development when setting the go -live date, which also then affects the business case. Has the cost v benefit for such a very limited lifespan in legacy, been assessed and justified?	Thank you for your comments. The Code Manager is liaising with the Proposer regarding making changes to the solution which would make the group optional for non-MHHS MPANs to limit the impact to Legacy MOAs systems.
ScottishPower Energy Retail (Energy Supplier)	Yes	Thank you for your comments.
Octopus Energy (Energy Supplier)	Yes	Thank you for your comments.
SMS Energy (Metering Equipment Manager)	It appropriately accounts for the move to MHHS arrangements but could reduce the changes required in legacy with some minor changes made to the solution.	Thank you for your comments.

Question 7:	Do you agree with the changes made to the Market Message?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
IMServ (Metering Equipment Manager)	No, as a MOP we don't think we should be making any changes to the D0303	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	While we do not disagree with the proposal to add this conditional data item to a new group at the end of the Market Message for MHHS-migrated metering points, we believe that alternative solutions should be explored through the working group before agreeing to any changes to the existing data flow. A full cost-benefit analysis is required prior to implementing any amendments.	Thank you for your comments. This has been discussed at Change Issues Group, but there are no plans by the Code Manager to stand up a bespoke working group. This has been out for Information Request with multiple proposed solutions, and this is the solution the Proposer has chosen to pursue. The responses to this Party impact assessment will be used as part of the cost benefit analyst for this Change Proposal.
Octopus Energy (Energy Supplier)	n/a	n/a
SMS Energy (Metering Equipment Manager)	The redlined MM00240 - Notification of Meter Operator, Supplier and Metering Assets installed / removed by the MOP to the MAP indicates that Direction of Energy Flow is captured at meter level 'Direction of Energy Flow message collection must be present for every meter	Thank you for your comments. The Code Manager is liaising with the Proposer regarding this suggestion.

	installed which is owned by the Meter Asset Provider' with the addition of the '1-*', Energy Direction on the IF-033/IF-036 is positioned at MPAN level. All meters associated to the MPAN, outside of possible Complex Sites variations, would have the same Energy Direction adding a conditional DI50337 / J0727 / DI-035 into the 73C line also be sufficient. If the additional 'AAA' line is to be added by all agents onto the D0303, then adding an additional item into line 73C instead would be of a similar level of work. Unless the 'AAA' line is to be 0-1 instead of 1-* We note the lack of change to the version number in the redlined document; we would expect a version number change to occur.	Any version change that is required will be done as part of release activities.

Question 8:	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)	Unknown, changes to legacy MOP software was not expected before MHHS migration end, so we would need investigate how the changes might be delivered.	Thank you for your comments. Please see other comments from the Code Manager regarding limiting the impact to legacy MOAs.
ScottishPower Energy Retail (Energy Supplier)	Given that the change adds a new data item to the existing data flow, an implementation lead time of no less than six months from approval is appropriate. This timeframe ensures Parties can make the required system and process adjustments.	Thank you for your comments.
Octopus Energy (Energy Supplier)	As our Tech Team is heavily involved in MHHS currently, we would need c3months for a fix to be scheduled	Thank you for your comments.
SMS Energy (Metering Equipment Manager)	n/a	n/a

Question 9:	Are you aware of any constraints on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
IMServ (Metering Equipment Manager)	Development freeze on Wheatley Associates legacy MOP software	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	As noted in our response to Question 8, we consider it prudent for the implementation date to be scheduled no earlier than six months following approval. This lead-time will ensure that all REC Parties have adequate opportunity to undertake the necessary system development, testing, and assurance activities, thereby supporting a controlled, coordinated, and low-risk implementation across the market.	Thank you for your comments.
Octopus Energy (Energy Supplier)	n/a	n/a
SMS Energy (Metering Equipment Manager)	Ongoing Migration cadence should be considered, choosing a point in time of least impact to these activities would be a preference.	Thank you for your comments.

Question 10:	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)	Not specifically, although we know it would divert development and operational resource from other areas i.e. MHHS ELS and service enhancements.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	We do not anticipate any risks to our qualification or migration activities for MHHS implementation arising from the delivery of this change.	Thank you for your comments.
Octopus Energy (Energy Supplier)	No	Thank you for your comments.
SMS Energy (Metering Equipment Manager)	This will introduce additional development requirements during a period when demand for development work is already high.	Thank you for your comments.

Question 11:	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
ScottishPower Energy Retail (Energy Supplier)	We can confirm that implementation of the proposed solution would incur some cost to our organisation. However, these costs are minimal and are expected to fall within the £0–£9,999 range.	Thank you for your confirmation.
Octopus Energy (Energy Supplier)	B – Development and implementation time of an analyst	Thank you for your confirmation.
SMS Energy (Metering Equipment Manager)	n/a	n/a

Question 12:	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)	None whatsoever	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	As a Supplier, we do not identify any direct benefits arising from the implementation of the proposed solution. The proposed solution is primarily designed to support other market participants, and while we recognise its value in that context, it does not provide measurable advantages to our organisation in terms of cost, performance, or risk mitigation.	Thank you for your comments.
Octopus Energy (Energy Supplier)	Yes, it will remove the manual work around currently in place with our MOP, and speed up the processing of the flows	Thank you for your comments.
SMS Energy (Metering Equipment Manager)	We see no benefit from this change for our MOA/MS business, although our MAP business may gain value from identifying Energy Direction.	Thank you for your comments.

Question 13:	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. We don't think this change should be made.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	As stated in our response to Question 12, as a Supplier, we do not identify any direct benefit arising from this change. The proposed solution is primarily intended to support other market participants, and although we recognise its value in that broader context, it does not deliver measurable advantages to our organisation in terms of cost, operational performance, or risk mitigation. We have no reservations regarding the progression of this change; however, we recommend that alternative options for communicating this information between MOPs and MAPs are explored and fully assessed before implementation is confirmed. This would help ensure that the most efficient and proportionate solution is adopted for all Parties.	Thank you for your comments.
Octopus Energy (Energy Supplier)	Yes	Thank you for your comments.
SMS Energy (Metering Equipment Manager)	We do not see value in making changes to legacy systems to accommodate a line or field that cannot—and will not—be populated. Similarly, for our MHHS MS system, there is little to no benefit in implementing this change.	Thank you for your comments.

	There may be some potential benefit for our MAP business.	

Question 14:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
IMServ (Metering Equipment Manager)	For the reasons outlined above, we believe the proposal should be withdrawn and an alternative solution be sought.	Thank you for your comments. The Proposer has elected to progress this solution option, but the Code Manager will keep all comments in mind when making a recommendation.
ScottishPower Energy Retail (Energy Supplier)	We have no further comments to make.	n/a
Octopus Energy (Energy Supplier)	n/a	n/a
SMS Energy (Metering Equipment Manager)	No	n/a