RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	**Final Recommendation**

CHANGE REPORT

R0266 REC DATA SPECIFICATION CLARIFICATIONS

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	06 November 2026
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Change Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	Medium	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	All REC Parties		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	SUBJECT MATTER EXPERT
CAROLINE FREIMULLER	MAITRI PERERA	LORNA MALLON
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OVERVIEW

This issue has been raised to improve the clarity of elements of the Energy Market Data Specification (EMDS) that are ambiguous due to information from the pre-REC Data Transfer Catalogue (DTC) Annex C and gas RGMA Annex B being omitted in the transition to REC.

RESPONSIBLE COMMITTEE DECISION

On **07 April 2026,** the REC Change Panel voted, in line with the Code Manager recommendation, to:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 06 November 2026.

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BACKGROUND

1 SUMMARY

Prior to the REC, the Master Registration Agreement (MRA) and Supply Point Administration Agreement (SPAA) had additional mandatory information that sat alongside the Data Transfer Catalogue with additional rules, conditions and examples for populating various Data Flows. These were known as Annex B (gas) and Annex C (electricity).

These did not fully migrate over to the REC or transfer to other industry codes. While many of the conditions and Data Item rules are present in the current EMDS, this Change Proposal is covering all of Annex B and Annex C to determine what did not carry over to the REC or other industry codes, and to add in anything deemed still necessary/relevant.

2 PROBLEM STATEMENT

There may be a lack of clarity for Parties populating Market Messages / Data Flows as not all of the additional rules, conditions and examples from Annex B and Annex C transitioned into the REC (or to another industry code).

3 IMPACTS

REC PARTIES AND SERVICE USERS
All REC Parties

REC DOCUMENTS / PRODUCTS
Data Specification
Schedule 14 – Metering Operations
Schedule 30 - Resolution of Consumer Facing Switching and Billing Issues

MHHS
While there is no direct impact to MHHS by this Change Proposal, it will be considered throughout solution development deciding what is necessary for inclusion in the current version of the EMDS or other documentation.

4 CROSS-CODE IMPACTS

This Change Proposal is being discussed and tracked at the Cross Code Steering Group (CCSG). No impacts to the Uniform Network Code (UNC) have been identified.

Some of the proposed changes impact Market Messages with Scenario Variants owned by both the REC and the Balancing and Settlement Code (BSC). The BSC has so far elected not to raise a cross-code change, and changes to BSC owned Scenario Variants will be made under this REC Change Proposal.

Market Messages where all Scenario Variants are owned by the BSC are not in scope of this Change Proposal. The BSC are responsible for making their own checks for these Market Messages for any changes that may be required, or for hosting Annex C on the BSC website, if any required changes have not been made when Annex C stops being hosted on the REC Portal.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**11 Jul 25**	**09 Jan 26**
	Solution Development	July	September
	Change Issues Group update	October	October
	Solution Refinement	October	November
	Party Impact Assessment	October	November
	Business Case Assessment	December	January
Change Proposal		**10 Jan 26**	**06 Apr 26**
	Consultation	January	February
	Final Determination	March	April
Voting		**07 Apr 26**	**07 Apr 26**
	Appeal Window	08 April 26	22 April 26

6 STAKEHOLDER ENGAGEMENT

The Code Manager has utilised both the Metering Expert Panel (MEP) and Technical Expert Panel (TEP) as a critical friend, to answer specific metering and Data Specification questions as they arise. The Code Manager has used and will continue to use the Change Issues Group (CHIG) as required.

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7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	0	27	0
	Retail Markets Impact	Innovation and Market Arrangements	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	3	7	20
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		1	9	9
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Cross Code Activity	2	10	20
				Overall Priority Score (rounded)	111

Priority Status	MEDIUM
Change Proposal Type	STANDARD

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SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

Initial analysis was conducted collaboratively between RECCo, REC Technical Services and REC Professional Services to confirm what in Annex B and Annex C was already in the Data Specification or other REC documents, what was no longer required and what needed to be updated. This was all looked at through the lens of MHHS to make sure any guidance was still appropriate, or split by MHHS and Non-MHHS Metering Points where required.

9 PROPOSED SOLUTION

The proposed solution makes changes to:

- Data Specification;
- Schedule 14 – Metering Operations; and
- Schedule 30 - Resolution of Consumer Facing Switching and Billing Issues.

It also proposes the removal of Annex C from the REC Portal, and the introduction of a new Operational Document. This is proposed to be a new Category 2 Document titled “Rules for the Completion of Electricity Market Messages” and by owned by the Technical Expert Panel.

10 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution (electricity) to R0266 can be found here.

No changes were made to the electricity solution following Party impact assessment.

The legal text changes to deliver the proposed solution (gas) to R0266 can be here.

This has had one update since Party impact assessment, which is the inclusion of the text “*This address group identifies the collection address for the removed Asset”* in the first of two Address groups in the ONJOB Market Message, for Scenario Variants 40016, 40017, 40019 and 40020 only.

The Code Manager was initially unsure which Address Group this text belonged with as the original Annex B text stated “*Level 5 Address group identifies collection address for removed Asset*” and there were level 5 Address groups. Additional research has identified that when this text was written, one of the Address groups was level 5 and the other level 3. Both are level 5 in the current version of the Data Specification.

The Code Manager has put this text against the Address group that was originally level 5.

Changes made post consultation are captured in section 16 of this Change Report.

PRELIMINARY ASSESSMENT

11 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

11.1 SERVICE PROVIDER IMPACT ASSESSMENTS

No Service Provider impact assessment was required was part of this Change Proposal.

11.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was conducted from 02 October 2025 to 28 November 2025. In total one response was received from a Distribution Network Operator (DNO). The non-confidential responses have been published here.

DISTRIBUTION NETWORK OPERATORS	• The DNO was overall supportive of the Change Proposal, and believed it should be implemented. They confirmed they believed it would add clarity to the Data Specification and population of Market Messages. • The DNO agreed the proposed solution addresses the problem statement, and confirmed they believed the Code Manager has identified and considered all processes and scenarios that may be impacted by this Change Proposal. The DNO also confirmed they believed the solution appropriately accounts for the move to MHHS for both MHHS and non-MHHS Metering Points. • The DNO has no comments on the legal text or Data Specification provided for impact assessment. • The DNO confirmed they would require between one and two months to implement the proposed solution, and that they foresaw their costs as being minimal (less than £10,000).

12 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

12.1 RISKS AND ISSUES

NO.	RISK	NOTES	MITIGATION
R01.R0266	The BSC do not update Market Messages owned by them before Annex C stops being hosted on the REC Portal, leaving outdated references in place.		The BSC will host Annex C on the BSC website if required at the implementation of R0266. This has been discussed at CCSG.

No issues have been identified with this Change Proposal.

12.2 ASSUMPTIONS AND DEPENDENCIES

No assumptions or dependencies have been identified with this Change Proposal.

13 BUSINESS CASE ASSESSMENT

13.1 COSTS

There are no central systems costs associated with the implementation of this Change Proposal.

Costs to Parties are expected to be minimal, which has been validated by the one response to the Party impact assessment.

13.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
INCREASED CLARITY FOR PARTIES WHEN POPULATING MARKET MESSAGES	The implementation of this Change Proposal should see an increase in clarity for Parties when populating Market Messages. The Code Manager expects this should be particularly noticeable for newer entrants to the market, who may not have the experience or access to older copies of documents (like Annex B and Annex C) that may still be being referenced by legacy Parties.
INCREASED COHESION BETWEEN PARTIES	The implementation of this Change Proposal should see a reduction in ambiguity for Parties as the extra guidance available should mean all Parties are interpreting the fields of Market Messages and populating them in the same way. The Code Manager believes this will lead to an increase in cohesion, and the reduction of back-and-forth queries between Parties.

13.3 COST BENEFIT ANALYSIS

As there are no central system costs, minimal Party costs and two intangible benefits associated with this Change Proposal, the Code Manager believes there is a positive case for change.

14 CASE FOR CHANGE

The Code Manager considers there is a positive case for change for implementing this Change Proposal on the basis that the proposed solution:

- Is both viable and implementable, and effectively resolves the problem statement;
- Has no associated central systems costs and minimal associated Party costs;
- Has proportionate effort required for implementation;

- Should provide increased clarity for Parties when populating Market Messages; and
- Should provide increased cohesion between Parties.

15 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 23 January 2026 to obtain views on the Change Report (For Consultation). In total four responses were received from a two DNOs, a Metering Equipment Manager (MEM) and the Central Data Service Provider (CDSP). The key themes from these responses have been summarised and set out below. The non-confidential responses have been published here.

15.1 SUMMARY OF RESPONSES

The three respondents who submitted non-confidential responses were broadly supportive of this Change Proposal and believed it should be implemented, with one respondent identifying some amendments to the solution they wished to be made.

The fourth respondent submitted confidentially. Their response has been considered by the Code Manager but will not be referenced in this Change Report.

15.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

One respondent had multiple comments on the proposed solution. Many of these amendments have been taken forward and are documented within section 16 of this Change Report. Many of the other suggestions have been deemed as out of scope of this Change Proposal as they were against Data Item Rules already in place within the EMDS, or looked to further broaden the obligation past what was in Annex B.

While the Code Manager has deemed these are out of scope of R0266 because it is towards the end of the Change Process and these changes cannot be adequately impact assessed, we would welcome a new Change Proposal being raised for these suggestions to be reviewed.

15.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

The three non-confidential respondents all agreed with the Code Manager's assessment of the costs and benefits associated with this Change Proposal, and with the Code Manager's recommendation that this Change Proposal be approved via the self-governance Change Path with the Technical Expert Panel as the Responsible Committee.

15.4 IMPLEMENTATION DATE AND APPROACH

The three non-confidential respondents all agreed with the suggested implementation approach of Big Bang, and proposed implementation date of 06 November 2026. One respondent did caveat their response that their agreement with the proposed implementation date was contingent on their proposed amendments to the solution being taken forward.

16 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

DOCUMENT	SECTION	AMENDMENT	REASON
Address Population Rules		Removed from scope of Change Proposal.	Feedback at consultation queried if this document was relevant to gas. Planned amendment now split between Sub Building Name Number, Building Name Number, Dependent Throughfare, Thoroughfare and Post Code Data Item Rules.
Solution document – gas	ONJOB Market Message	Corrected spelling of convertor to converter in Date of Notice Data Item	
Solution document – gas	ONJOB Market Message	Update Market Sector Code Data Item Rule to "Use CDSP T73 'Request for amending the Market Sector Code' for non-CSS sites, otherwise this should be updated via CSS."	Feedback received from the CDSP in when this T73 process should be used.
Solution document – gas	ONJOB Market Message	Update Register Type Code Data Item Rule with text "for a single asset".	Additional request for clarity that this Data Item might be duplicated where this is more than one asset (e.g. installed and removed).
Solution document – gas	ONJOB Market Message	Update to Group Condition 027 Name to remove comma and add period between sentences.	Additional request for clarity that the two sentences were separate and not linked.
Solution document – electricity	D0268 Market Message	Addition of " Where an AMVLP (Asset Metering Virtual Lead Party) is involved, the MPAN Core must contain an AMSID (Asset Metering System Identifier) and not an MPAN." to flow notes	This has been removed by the MHHS release, and needs to be added back into the flow notes.
Solution document – electricity	D0268 Market Message	Removal of "Measurement Quantity Id value must be UN if the active channel is not used. (enumerations AI / AE etc are not currently in the DTC)." from Measurement Quantity Id Data Item Rule.	Enumeration values have been added to the Measurement Quantity Id Data Item since this Change Proposal was raised and this text is no longer required. The Code Manager is removing it under this Change Proposal rather than raising a separate Housekeeping Change Proposal.

DOCUMENT	SECTION	AMENDMENT	REASON
Schedule 14 Metering Operations		Update “Temporary check meters are not allocated an MPAN and are NOT to be included in any flows unless otherwise specified.” to “Temporary check meters are not allocated to a Metering Point and are NOT to be included in any flows unless otherwise specified.”	Updated from MPAN to Metering Point to be more in line with current REC language.
Schedule 30 Consumer Facing Switching and Billing Issues		Removed from scope of Change Proposal.	To allow more time to investigate whether the rules that were to be included are still required. This will be investigated under REC Issue I0295. These were: Smart DCC-serviced CoS Disputed Reads (MPAN Core Process = D): Where a D0300 is sent between Suppliers all time of use settlement registers and the total cumulative register shall be populated as 60C (Meter Register Details) groups. For the relevant MPAN this will mean the following: • The import MPAN: 48 time of use registers plus total cumulative • The secondary MPAN of a twin element smart metering system: 4 time of use registers plus total cumulative • Export MPAN: active export register And: Smart DCC-serviced CoS Disputed Reads (MPAN Core Process = D): When populating the “Meter Register Id” (J0010) Suppliers shall assign the following values: • Import MPAN: ‘1’ through to ‘48’ for each time of use settlement register logically sequenced in

DOCUMENT	SECTION	AMENDMENT	REASON
			accordance with the 1 x 48 tariff time of use register matrix. • Secondary MPAN: '1' through to '4' for each time of use settlement register logically sequenced in accordance with the 1x4 secondary tariff time of use register matrix.

17 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Electricity Gas
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
CONSOLIDATED CONSULTATION RESPONSES	Link

18 GLOSSARY

TERM	DEFINITION
Balancing and Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
Data Specification	means the document of that name forming part of the Technical Specification.
Review of Gas Metering Arrangements (RGMA)	means the Authority-led project which facilitated competition in metering by unbundling it from monopoly transportation businesses and producing, amongst other things, a baseline of standard processes and data flows.
Uniform Network Code (UNC)	means the Uniform Network Code established under the Gas Transporter Licences.