RETAIL ENERGY CODE

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

CHANGE REPORT

R0300 AMENDMENTS TO D0312 TO ALIGN WITH BSC CP1622

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	26 June 2026
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Technical Expert Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	High	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Electricity Supplies, ERDAs, MOAs		

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

Elexon have raised CP1622 to amend the Validation rules within the Supplier Meter Registration Service (SMRS) for the Number of Register Digits Data Item within the IF-005 Market Message, to allow digit values from 1–9, ensuring accurate data and reducing exceptions.

There are no Validation rules related to the D0312 Market Message which need to be amended under the Balancing and Settlement Code (BSC), but the D0312 itself contains a Data Item Rule regarding the Number of Displayed Register Digits which needs to be amended in line with CP1622.

RESPONSIBLE COMMITTEE DECISION

On **25 March 2026,** the REC Technical Expert Panel, in line with the Code Manager recommendation, voted to:

- **APPROVE** that this Change Report contains sufficient information to proceed to Consultation, noting the Code Manager Minded-to Position below.

The Code Manager Minded-to Position is to recommend that the REC Technical Expert Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 26 June 2026.

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BACKGROUND

1 SUMMARY

The Market-wide Half Hourly Settlements (MHHS) Programme Data Cleanse Closure Report identified an issue, understood to affect around 250,000 SMETS2 Electricity Smart Meters with Displayed Register Digit configurations incompatible with MHHS design specifications. This prevents the Supplier Meter Registration Service (SMRS) from being accurately updated or recording Displayed Register Digits, risking data discrepancies, billing errors, and Settlement issues.

CP1622 Amendment of validation within SMRS for number of Meter Digits has been raised under the BSC to amend the Validation rules within SMRS for the Number of Displayed Register Digits Data Item within the IF-005 'MTD Updates to SMRS' (MM20035) Market Message. This amendment is proposed to ensure accurate data and reducing exceptions. This REC Change Proposal has been raised to amend the D0312 'Notification of Meter Information to MPAS' (MM00256) Market Message to allow the Data Item Rule regarding the Number of Displayed Register Digits in line with CP1622.

This Change Proposal was raised as a fully formed solution, however during initial assessment, it has become apparent that the BSC and REC changes, as proposed, have wider industry impacts that have not so far been fully considered.

In addition, it was also identified that the Energy Market Data Specification (EMDS) currently links the DI-091, the DIP Data Item, to the incorrect legacy Data Item (J0478/DI50228 - Number of Register Digits) and not the Number of Displayed Register Digits (J2313/ DI51600). Although, the Data Item is correctly captured in the MHHS design, and therefore what participants should have implemented, the incorrect linkage is leading to confusion, particularly when working through the required solution for these changes.

These were linked to an MHHS Programme risk impacting MHHS Migration and therefore were thought to require urgent industry engagement and resolution to confirm the solution to be progressed. This has since been removed from the migration exclusion list by the MHHS Programme.

2 PROBLEM STATEMENT

BSC CP1622 is looking to address that SMRS cannot accurately update the Number of Displayed Register Digits for a SMETS2 Smart Electricity Meter due to Validation rules currently in place.

The Validation rules proposed to be amended are those on the IF-005, which has direct impacts to the D0312.

3 IMPACTS

CONSUMERS
Electricity Consumers with SMETS2 Meters

REC SERVICE PROVIDERS
ERDS Providers

REC PARTIES AND SERVICE USERS
Electricity Suppliers
Meter Operator Agents (MOAs)
Electricity Retail Data Agents (ERDAs)

REC DOCUMENTS / PRODUCTS
Data Specification

This change directly impacts Electricity Consumers as the purpose of the Number of Displayed Digits is to support Consumer billing in line with what a Consumer can see on the meter display.

Although under MHHS the Validation rules are governed under the SMRS obligations in the BSC, in the non-MHHS arrangements the governance for the D0312 sits with the ERDAs. The IF-005 and D0312 are closely linked in the Meter Point Registration System (MPRS) that supports both SMRS and Electricity Retail Data Service (ERDS) and therefore impacts on both the REC and BSC providers need to be considered.

MOAs are impacted by this change, as the REC Parties exchanging the J2313 Data Item. Electricity Suppliers are also impacted due to their use of the data for billing processes.

MHHS
This Change Proposal and BSC CP1622, were directly linked to a MHHS Programme risk that identifies approximately 250,000 Smart Electricity Meters which were thought to be excluded from being migrated into the MHHS arrangements. This has since been reconsidered and this issue removed from the MHHS migration exclusion list.

4 CROSS-CODE IMPACTS

This is a cross-code change with BSC CP1622 Amendment of validation within SMRS for number of Meter Digits, with the BSC as the lead code.

During the Code Manager initial assessment of R0300 following submission, it was identified that the Code Manager could not support the solution as proposed under CP1622 due to the wider impacts to industry. A REC consultation response was submitted on CP1622, and a number of meetings have been held with cross-code and MHHS Programme stakeholders throughout January 2026 where it has been agreed that further industry engagement was required.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Change Proposal		**12 Dec 25**	**28 April 26**
	Code Manager Initial Assessment	December	December
	Cross-code Industry Engagement	December	February
	Solution Development	February	March
	Impact Assessment	February	March
	Solution Refinement	March	March
	Consultation	March	April
	Solution Refinement	April	April
	Final Determination	April	April
Voting		**29 April 26**	**29 April 26**
	Appeal Window	30 April 26	15 May 26

The previous version of this Change Report finished with solution development concluding by 24 March 2026. The Code Manager has since run a Party impact assessment, with more information in section 10 of this Change Proposal.

This extension to plan proposes a consultation running from 27 March to 21 April 2026, and voting occurring by no later than the April Technical Expert Panel meeting. This is the last meeting the vote could occur, and this Change Proposal still be able to be implemented as part of the June release.

This is aligned with the BSC as far as is possible, with them expecting to run the CP1622 consultation from 16 March to 17 April 2026 with final vote to occur at the Supplier Volume Allocation Group (SVG) meeting on 05 May 2026.

6 STAKEHOLDER ENGAGEMENT

A joint REC BSC industry engagement workshop was held on 05 February 2026, with the minutes available here.

The workshop covered the REC and BSC positions that this problem was not stopping Metering Points from Migrating to the MHHS arrangements and some clarifications on the difference between Register Digits and Displayed Register Digits which seemed to have been causing some confusion. Guidance was provided by the BSC on meter read truncation, with BSCP504 and BSCP701 specifying that where the number of Register Digits was longer than Displayed Register Digits the front digits should be truncated from the reading.

A discussion was held over the solution and what technical validation was required to be in place, with consensus reached that the solution should allow for what is reflected on Consumers meter displays. Evidence was provided of SMETS2 Electricity Meters with 7 Displayed Register Digits, and it was agreed the solution should allow for 7 digits to be populated for Meters installed before the implementation of SECMP0006 (which mandated 5 or 6 Displayed Register Digits).

The group discussed whether 1-4 or 8-9 Displayed Register Digits were required, with a conclusion reached these were erroneous data and not real meter characters. 26 of 31 votes were in support of limiting the technical validation of Displayed Register Digits to 5-7. The group agreed that the introduction of 8 or 9 was not necessary and may create new risks.

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	1	27	27
	Retail Markets Impact	Innovation and Market Arrangements	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	7	7
		Legal and Regulatory Compliance	3	14	43
Resource	Complexity / Effort / Duration		3	9	28
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)	157

Priority Status	HIGH
Change Proposal Type	STANDARD

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SOLUTION

8 PROPOSED SOLUTION

The REC solution proposes the below amendment of the Data Item Rule for the Number of Displayed Register Digits within the D0312 Market Message:

Where the Meter Type is S1, the value should be populated as per the manufacturer specification. For meters installed under SMETS2 V3.12 onwards w~~W~~here the Meter Type is S2A, S2AD, S2ADE, 2ADF, 2ADEF, 2AEF, 2AF, S2B, S2BD, S2BDE, 2BF, 2BDF, 2BDEF or 2BEF the value must be 5 ~~,~~ w~~W~~here the Meter Type is prefixed with S2C the value must be 6 or~~,~~ w~~W~~here the Meter Type is 2CDEF, 2CF, 2CDF or 2CEF the value must be 6 .

For meters installed under SMETS V3.11 and previous, this should be populated with 5, 6 or 7 as per the rules of the applicable SMETS version.

The solution under CP1622 would amend the technical validation of the Number of Displayed Register Digits Data Item by MPRS and SMRS to be 5-7 only. The specifics of the rule as above in the D0312 will not be subject to technical validation, but may be subject to Performance Assurance checks if it is later determined this is required.

8.1 DESCOPED SOLUTIONS

The original solution for CP1622 proposed widening the technical validation of the Number of Displayed Register Digits to 1-9.

The equivalent REC solution proposed the removal of the below Data Item Rule present for the Number of Register Digits (J2313 / DI51600) within the D0312 'Notification of Meter Information to MPAS' (/ MM00256) Market Message for all Scenario Variants:

"Where the Meter Type is S1, the value should be populated as per the manufacturer specification. Where the Meter Type is S2A, S2AD, S2ADE, 2ADF, 2ADEF, 2AEF, 2AF, S2B, S2BD, S2BDE, 2BF, 2BDF, 2BDEF or 2BEF the value must be 5. Where the Meter Type is prefixed with S2C the value must be 6. Where the Meter Type is 2CDEF, 2CF, 2CDF or 2CEF the value must be 6."

This solution has now been descoped following the discussions detailed in section 6 of this Change Report.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0300 can be found here.

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PRELIMINARY ASSESSMENT

10 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

10.1 SERVICE PROVIDER IMPACT ASSESSMENTS

No Service Provider impact assessment was conducted as part of this Change Proposal. Although central systems will have technical updates, the providers are not direct Service Providers of the REC.

10.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was conducted from 20 February to 13 March 2026. In total seven responses were received from four Distribution Network Operators (DNOs), two Energy Suppliers and St Clements Services as the MPRS Provider. The non-confidential responses have been published here.

ENERGY SUPPLIERS	• Both respondents were supportive of the proposed solution, with one stating they were happy with the proposed range of Displayed Register Digits being 5-7. The other respondent believed the validation should be widened out further to 1-9 digits (e.g. the descoped BSC solution). The Code Manager and BSC have discussed this proposal and elected to keep the solution restricted to 5-7 Displayed Register Digits for now. This is from feedback from the workshop held on 05 February 2026 (see section 6 of this Change Report for further details), lack of clarity on if 8-9 digits is being seen on Register Digits or Displayed Register Digits and the lack of risk to Settlement due to the truncation rules already in place in BSCP504 and BSCP701. The Code Manager has gone back to this respondent to gain further clarity, and there is scope for this and the BSC solution to be adjusted post consultation if further evidence can be provided on these 8-9 digits. • Both respondents confirmed minimal time was required between approval and implementation, with one specifying the June 2026 release proposed by CP1622 was possible. • No constraints for implementation were identified, other than the need to align the implementations of R0300 and CP1622. • One respondent flagged a risk to their MHHS Migration plans as this issue was on the Programmes Migration exclusion list. The Code Manager has confirmed this has now been removed. The Code Manager and BSC are still however aiming for a June 2026 release, in order to correct this issue as soon as possible. • One Energy Supplier confirmed they saw a one off minor cost from the implementation of this Change Proposal but did not quantify this cost. The other respondent expected they saw

	large costs to the industry (£62.5 million) from the impact of not expanding the solution to allow 9 digits if they have to replace these meters via exchanges. The Code Manager has gone back to this respondent to get further clarity on if these are Register Digits or Displayed Register Digits. If they are Displayed Register Digits, the Code Manager is under the assumption these can be re-configured rather than requiring an exchange. • Both Energy Suppliers saw benefits to their business from the implementation of this Change Proposal. However, one went on to clarify the benefits would be much greater if the validation were extended to allow 9 digits, and in fact the benefits of implementation would be offset by the detriment of incorrect Consumer billing they believed this Change Proposal would still see. They also specified they believed this Change Proposal was not future proofed allowing a full 1-9 digit range would do this. The Code Manager and BSC disagree with this assessment, as any amendment to the number of allowed Displayed Register Digits would require a change under the SEC. Part of that Change Proposal would need to include updates to the validation that would be progressed in a cross-code change.
DISTRIBUTION NETWORK OPERATORS	• All respondents were supportive of the proposed solution and highlighted the need for R0300 and CP1622 implementation alignment. • Three respondents agreed the proposed solution resolved the problem statement, with one caveating this question was more for Energy Suppliers to confirm than DNOs. The fourth did not provide a response to this question. • No concerns were raised that there were impacted scenarios or processes that had not been identified. • All respondents agreed the solution, combined with CP1622, appropriately accounted for MHHS and non-MHHS Metering Points. • No respondent confirmed a lead time between approval and implementation but did confirm they were working towards a June 2026 implementation as proposed by CP1622. The only concern flagged for implementation was CP1622 and R0300 must be implemented in the same release. • A risk was flagged by two respondents that technical releases during MHHS Migration could introduce a defect to MPRS, which could have consequences for MHHS Migration. The Code Manager and BSC have elected to continue to propose a release in June 2026 to resolve this issue as soon as possible. • Three confidential responses have been provided to the Code Manager regarding costs to implement, which will be considered.

	• Two respondents identified benefits to their business in an increase in accurate data, smoother MHHS Migration, consistency across codes and a reduction in Energy Supplier queries. • All respondents confirmed they agreed this Change Proposal should be implemented.
MPRS PROVIDER	• The MPRS Provider was supportive of the proposed solution and highlighted the need for R0300 and CP1622 implementation alignment. • The MPRS Provider provided no view on if the proposed solution resolved the problem statement and raised no concerns there were impacted scenarios or processes that had not been identified. • The MPRS Provider confirmed they agreed the solution, combined with CP1622, appropriately accounted for MHHS and non-MHHS Metering Points. • No lead time between approval and implementation was provided, but the respondent did confirm they were working towards a June 2026 implementation as proposed by CP1622. The only concern flagged for implementation was CP1622 and R0300 must be implemented in the same release. • A risk was flagged that technical releases during MHHS Migration could introduce a defect to MPRS, which could have consequences for MHHS Migration. The Code Manager and BSC have elected to continue to propose a release in June 2026 to resolve this issue as soon as possible. • A confidential response has been provided to the Code Manager regarding costs to implement, which will be considered. • The respondent agreed they believed the Change Proposal should be made, but that there was a need to prioritise changes across BSC and REC to ensure there is capacity to delivery all required Changes. This has been fed back to the REC Technical Services team to further investigate.

10.3 SUMMARY OF AMENDMENTS MADE FOLLOWING IMPACT ASSESSMENT

Following discussions with the BSC, no amendments have been made to the solution following impact assessment. However, the Code Manager has reached out to one of the Energy Supplier respondents to get further clarity and evidence on potential SMETS2 Meters with 8 or 9 Displayed Register Digits.

11 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

NO.	DEPENDENCY	NOTES	STATUS
D01.R0300	R0300 must be implemented at the same time as CP1622.	This is being discussed by the REC and BSC Lead Analysts, and monitored via the Cross Code Steering Group (CCSG).	On-going.

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A01.R0300	SMETS2 Meters that do not confirm to the 5 or 6 Displayed Register Digits mandated by SECMP0006 can be re-configured via firmware update.	If this assumption is not correct, there could be a large cost to industry to exchange these meters if/when the SMETS version they were installed under is end dated.	Validated – conversations with SEC.
A02.R0300	There are no risks to Settlement if the Number of Displayed Registers is not accurately displayed within SMRS/MPRS.	Conversations between REC and BSC have led to this conclusion, due to BSCP504 and BSCP701 already mandating there the Number of Register Digits is longer than the Number of Displayed Register Digits, the reading should be truncated to match the Number of Displayed Register Digits.	Validated.
A03. R0300	There are no meters that truly have 8 or 9 Displayed Register Digits.	No evidence has yet been provided that there are any meters on walls that have a Number of Displayed Register Digits that are not 5, 6 or 7. n.b. this has potentially been raised at Party impact assessment, but there is a lack of clarity as to whether Register Digits or Displayed Register Digits is being referred to. The Code	On-going - at the joint REC/BSC workshop, at Party impact assessment and at consultation.

		Manager has contacted the respondent for further clarity.	

No risks or issues have been identified as part of this Change Proposal.

12 BUSINESS CASE ASSESSMENT

12.1 COSTS

There are no central systems costs that will be paid from the REC Change budget associated with this Change Proposal.

Costs have been provided by St Clements as the MPRS Provider, and by DNOs as ERDAs, as they will have system updates to make. The MPRS Provider, while a central system, is not a direct REC Service Provider and its costs will be borne by DNOs rather than being paid from the REC Change budget.

All responses regarding costs have been provided confidentially so they cannot be referenced within this Change Proposal, but the Code Manager considers them proportional to fix the issue as raised.

12.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
INCREASE IN ACCURATE DATA	The widening of the Validation rules to allow 7 Displayed Register Digits will allow many meters to accurately reflect what is on Site and visible to Consumers. These should be limited to meters that were installed prior to the implementation of SECMP0006.
SMOOTHER MHHS MIGRATION	While it is possible for Metering Points to Migrate to the MHHS arrangements with the Number of Displayed Register Digits incorrect, it is not ideal and would require a data cleanse post Migration. The implementation of this Change Proposal should allow for these impacted meters to Migrate with the correct number of Number of Displayed Register Digits, allowing for a smoother Migration to the MHHS arrangements.
REDUCTION IN ENERGY SUPPLIER QUERIES	A benefit for DNOs (identified by a DNO at Party impact assessment) from the implementation of this Change Proposal is a reduction in queries from Energy Suppliers querying why their

	update has been rejected when it is related to the Number of Displayed Register Digits.
CONSISTENCY ACROSS ENERGY CODES	These updates keep the BSC and REC in line with each other and allow both of these codes to remain in line with obligations under the SEC while removing unnecessary and arduous restrictions that do not reflect the reality of the metering landscape.

12.3 COST BENEFIT ANALYSIS

As there are no central system costs, costs to Parties are seen as proportionate by the Code Manager and four intangible benefits associated with this Change Proposal, the Code Manager believes there is a positive case for change.

13 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 costs to Parties are seen as proportionate;
- Has proportionate effort required for implementation;
- Increases data accuracy for the Number of Displayed Register Digits Data Item;
- Allows for a smoother Migration to the MHHS arrangements for impacted Metering Points;
- Should lead to a reduction in queries for DNOs from Energy Suppliers regarding Number of Displayed Register Digits system rejections; and
- Keeps the REC, BSC and SEC consistent in their obligations regarding the Number of Displayed Register Digits for SMETS2 Electricity Meters.

14 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
RELATED CHANGE(S)	CP1622 Amendment of validation within SMRS for number of Meter Digits CP1622 - Consultation Responses

15 GLOSSARY

TERM	DEFINITION
Balancing and Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
Data Item	means the most granular level of data defining a specific attribute in respect of a data type, the permissible values for which are defined and controlled in the Data Item Catalogue.
Electricity Retail Data Agent (ERDA)	means a provider of a DNO's Electricity Retail Data Service.
Electricity Retail Data Service (ERDS)	means the electricity registration services provided under this Code to support the provision of electricity retail data to the CSS and other services.
Market Message	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
Market-wide Half Hourly Settlement (MHHS)	means market-wide half hourly settlement, which is being introduced pursuant to the BSC (see MHHS Implementation).
Metering Point	has the meaning given to it in the Electricity Distribution Licence, which for the time being means: "the point, determined according to the principles and guidance given in the MRA Transition Schedule to the Retail Energy Code, at which a supply of electricity taken into or conveyed from the licensee's Distribution System: (a) is or is intended to be measured; or

	(b) where Metering Equipment has been removed, was or was intended to be measured; or (c) in the case of an Unmetered Supply, is treated as measured."
Metering Point Administration Service (MPAS)	means the service of that name which each DNO is required to provide under its Electricity Distribution Licence.
Metering Point Registration System (MPRS)	means the System used or procured by each DNO in order to provide the Electricity Retail Data Service in accordance with the REC and / or the Supplier Meter Registration Service in accordance with the BSC.
Supplier Meter Registration Service (SMRS)	As defined within the BSC: means the service provided or to be provided by a Licensed Distribution System Operator for the registration of Metering Systems at Boundary Points on its Distribution System(s) and its Associated Distribution System(s) (if any).