RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0300 AMENDMENTS TO D0312 TO ALIGN WITH BSC CP1622

On 27 March 2026 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0300 Amendments to D0312 to align with BSC CP1622.

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	V1.0
RESPONSE TYPE	Non-confidential
DATE ISSUED	22 April 2026
RESPONSIBLE COMMITTEE	REC Technical Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE CONSULTATION ISSUED	27 March 2026
RESPONSE DEADLINE	21 April 2026

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	Yes, SPEN agree with the proposed solution.	Thank you for your comments.
Bryt Energy (Energy Supplier)	n/a	n/a
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	Yes.	Thank you for your comments.
Utilita Energy (Metering Equipment Manager)	Yes.	Thank you for your comments.

Question 2:	For Energy Suppliers and MOAs: do you have any technical validation in place for the Number of Displayed Register Digits when receiving the D0312 from ERDAs which will require updating as part of this Change Proposal? If yes, are you comfortable this can be done for June release?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	N/A	n/a
Bryt Energy (Energy Supplier)	Yes we have current technical validations in place. We are comfortable that we can update as part of our June releases	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	N/A	n/a
National Grid Energy Distribution (Distribution Network Operator)	NA.	n/a
Utilita Energy (Metering Equipment Manager)	No, validation is covered by internal data cleansing activity and process controls rather than systemic controls. We are comfortable with updates prior to the June release.	Thank you for your comments.

Question 3:	Do you agree with the proposed implementation approach (Big Bang)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we are supportive of a big bang approach, Validation cannot be applied into the MPRS system piecemeal and as such big bang approach is the only viable option.	Thank you for your comments.
Bryt Energy (Energy Supplier)	n/a	n/a
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	CP1622 and REC R0300 need to be applied in alignment on the same implementation date. This is to ensure MPANs are subject to the same validation rule in both Legacy and MHHS arrangements, and therefore there are no issues where an MPAN migrates or reverse migrates.	Thank you for your comments.
Utilita Energy (Metering Equipment Manager)	Yes.	Thank you for your comments.

Question 4:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	Yes.	Thank you for your comments.
Bryt Energy (Energy Supplier)	n/a	n/a
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	We would seek guidance from SCS in relation to the costs involved, from our perspective they would be low.	Thank you for your comments.
Utilita Energy (Metering Equipment Manager)	Yes.	Thank you for your comments.

Question 5:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the Technical Expert Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	Yes.	Thank you for your comments.
Bryt Energy (Energy Supplier)	n/a	n/a
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	Yes.	Thank you for your comments.
Utilita Energy (Metering Equipment Manager)	Yes.	Thank you for your comments.

Question 6:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 26 June 2026? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we are supportive of this implementation date (in alignment with BSC CP 1622).	Thank you for your comments.
Bryt Energy (Energy Supplier)	n/a	n/a
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	CP1622 and REC R0300 need to be applied in alignment on the same implementation date. This is to ensure MPANs are subject to the same validation rule in both Legacy and MHHS arrangements, and therefore there are no issues where an MPAN migrates or reverse migrates.	Thank you for your comments.
Utilita Energy (Metering Equipment Manager)	Yes, appreciating this must be implemented prior to MHHS milestones.	Thank you for your comments.

Question 7:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	No further comments.	n/a
Bryt Energy (Energy Supplier)	n/a	n/a
Northern Powergrid (Distribution Network Operator)	This change implementation would need to be in line with associated industry change BSC CP1622, to ensure MPRS validation rules are in alignment with the Legacy and MHHS arrangements needed to prevent issues with forward and reverse migrations.	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	No.	n/a
Utilita Energy (Metering Equipment Manager)	No.	n/a