RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0300 AMENDMENTS TO D0312 TO ALIGN WITH BSC CP1622

On 20 February 2026 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution 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.

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RESPONSIBLE COMMITTEE	Technical Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	20 February 2026
RESPONSE DEADLINE	13 March 2026

Question 1:	Did you attend the joint REC/BSC workshop on 05 February 2026?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	No.	Thank you for your confirmation.
St Clements Services (MPRS Provider)	Yes	Thank you for your confirmation.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your confirmation.
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Thank you for your confirmation.
E.ON Next (Energy Supplier)	No.	Thank you for your confirmation.
Centrica (Energy Supplier)	No, we were unable to attend the workshop due to the short notice provided. (3 WDs)	Thank you for your confirmation.
UK Power Networks (Distribution Network Operator)	A representative of UKPN attended.	Thank you for your confirmation.

Question 2:	Do you have any comments on the proposed solution, including comments on the proposed changes to the Data Item Rule?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	We are supportive of the inclusion of validation on this data item.	Thank you for your comments.
St Clements Services (MPRS Provider)	The D0312 validation proposed in R0300 would need to align with the IF-005 Validation in BSC CP1622 to avoid conflicts when an MPAN is Forward or Reversed Migrated to/from MHHS. The Go live Date for R0300 would also need to be aligned to BSC CP1622 (currently June)	Thank you for your comments. The REC and BSC will align implementation of CP1622 and R0300.
Northern Powergrid (Distribution Network Operator)	To ensure that the D0312 validation is in line with MHHS IF-005 validation, both R0300 and CP1622 must be in alignment to avoid data conflicts during migration. The implementation date for both must also be in parallel.	Thank you for your comments. The REC and BSC will align implementation of CP1622 and R0300.
National Grid Electricity Distribution (Distribution Network Operator)	We believe that D0312 validation that is proposed in R0300 would need to align with the IF-005 Validation in BSC CP1622. This would be to avoid conflicts when an MPAN is Forward or Reversed Migrated to or from MHHS. We are also of the thinking that the go live date would need to be aligned to BSC CP1622.	Thank you for your comments. The REC and BSC will align implementation of CP1622 and R0300.

E.ON Next (Energy Supplier)	Partially agree We believe that the solution only partially addresses the issue. While technical validation in SMRS allows for 5-7 digits, it does not validate to the specific SMETS2 version level. Crucially, early SMETS2 meters are configured on site with meter registers of 5, 6, 7, 8 & 9 digits. The current rigid rule means that when these meters are migrated into MHHS, the Meter Service will be unable to update the digit count to match the physical meter setting. Failure to correct this limitation and allow for the accurate number of digits will lead to significant billing and settlement issues for Suppliers once an MPAN migrates and the meter rolls past 99,999.	Thank you for your comments. It is not possible for SMRS to validate against the specific SMETS2 version level as this is not information they will hold. It will be looked at if the future if this is something that requires Performance Assurance activity to check it is being correctly populated by Parties. The Code Manager and BSC have decided not to widen the range at this time, following the feedback from work group held on 05 February 2026 (minutes here) as the majority of attendants felt there were no SMETS2 meters with 8 or 9 Displayed Register Digits on the wall. This can be reviewed if evidence can be provided of significant numbers. However, this will not lead to settlement issues as BSCP504 and BSCP701 specifies that where the Number of Register Digits is longer than the Number of Displayed Register Digits, the Number of Register Digits should be truncated.
Centrica (Energy Supplier)	We agree with the proposed changes to the Data Item Rule.	Thank you for your comments.

UK Power Networks (Distribution Network Operator)	We are aligned with the response provided by our Service Provider, SCS. The solution needs to align with BSC CP1622 to which we have responded separately.	Thank you for your comments. The REC and BSC will align implementation of CP1622 and R0300.

Question 3:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	We believe that the proposed solution addresses the problem as per discussions at various industry groups, however believe that this is a call to be made by suppliers and their agents rather than DNO's.	Thank you for your comments.
St Clements Services (MPRS Provider)	n/a	n/a
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We are inclined to agree that the proposed solution addresses the problem statement. Something to note however, that successful implementation is dependent on CP1622 being delivered simultaneously.	Thank you for your comments.
E.ON Next (Energy Supplier)	Partially agree The core problem identified in the problem statement centers on the inflexible nature of the Supplier Meter Registration Service (SMRS) system, specifically its inability to accurately process and update register digits due to overly rigid validation rules. A critical failure of the proposed solution is its insufficient scope for future proofing, stemming from a decision to cap the D0312 data item at 7 digits, rather than adopting the full 1-9 digit range as was originally recommended under the scope of BSC CP1622.	Thank you for your comments. The Code Manager and BSC have decided not to widen the range at this time (please see further information in response to Q2). However, it should be noted that this Change Proposal is not looking at the Number of Register Digits, only the Number of Displayed Register Digits. SMETS2 meters are often configured to have 8 or 9 Register Digits, but

	This restricted approach creates a significant risk and immediate operational limitation for the industry, as it fails to adequately accommodate the register digit requirements for an estimated 250,000 meters that were identified as needing data cleansing as part of the overarching Market-wide Half-Hourly Settlement (MHHS) Programme. By limiting the digit count, the solution ensures that a substantial cohort of meters will remain incorrectly represented within SMRS, creating data inaccuracies. This lack of foresight directly undermines the objective of a clean, accurate register and will necessitate a future change to address the shortfall unless it is fully resolved within this change proposal, imposing unnecessary cost and complexity on industry participants shortly after the MHHS implementation. A truly robust and sustainable solution must incorporate the full 1-9 digit range to ensure all meters can be accurately recorded now and into the future.	still only 5 or 6 Displayed Register Digits as mandated by SEC Change SECMP0006. SEC have confirmed they expect that any SMETS2 meters which do not conform to SECMP0006 could be re-configured to show the correct Number of Displayed Register Digits via firmware update. The Code Manager has reached out to this respondent for clarity of whether the 8 and 9 digits they refer to are Register Digits or Displayed Register Digits.
Centrica (Energy Supplier)	Yes, we agree that the proposed solution addresses the problem statement.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	N/A	n/a

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**
Scottish Power Energy Networks (Distribution Network Operator)	As above, we believe that this is a point more pertinent to Suppliers and their agents, however we believe that the scenarios discussed at working groups have been covered.	Thank you for your comments.
St Clements Services (MPRS Provider)	n/a	n/a
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Thank you for your comments.
E.ON Next (Energy Supplier)	No. This has not fully addressed the scenario where a meter configured with 8 or 9 digits clocks over. Once these meters migrate to MHHS, the lack of accurate digit registration will cause significant settlement and billing discrepancies. The current industry systems and processes have not yet fully resolved the complex and concerning scenario surrounding electricity meters configured to register consumption with eight or nine digits when they experience a 'clock-over' event. This failure to adequately address a potentially widespread technical issue poses a significant risk. Without a proactive and comprehensive resolution	Thank you for your comments. The Code Manager and BSC have decided not to widen the range at this time (please see further information in response to Q2). However while the Code Manager acknowledges this could lead to incorrect billing situations if an Energy Supplier is unable to manually override this in their billing systems, this will not impact settlements. BSCP504 and BSCP701 specifies that where the Number of Register Digits is longer

	before the MHHS migration, the integrity of the settlement and billing will be impacted and consumers will receive incorrect bills.	than the Number of Displayed Register Digits, the Number of Register Digits should be truncated.
Centrica (Energy Supplier)	We raised a concern within our response to the CP1622 consultation. With the validation now permitting additional values, there is a risk that sites outside of the ~250k identified SMETS2 meters could inadvertently be validated with incorrect digit counts. To mitigate this, we recommend that industry parties collaborate to develop clear guidance and automated controls within their systems to flag any instances where meter digit values fall outside the expected parameters for these specific sites.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	N/A	n/a

Question 5:	Do you believe 5-7 is an appropriate range for the Number of Displayed Register Digits?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	Yes.	Thank you for your comments.
St Clements Services (MPRS Provider)	n/a	n/a
Northern Powergrid (Distribution Network Operator)	We believe this question is best targeted to Suppliers to confirm.	n/a
National Grid Electricity Distribution (Distribution Network Operator)	Yes — 5–7 digits is an appropriate and justified range for SMETS2 meters, based on the information outlined in the R0300 documentation, and discussions at the workgroup.	Thank you for your comments.
E.ON Next (Energy Supplier)	No. E.ON Next strongly recommends that the range for the meter's digit count be established as 1 to 9. The current proposal, which restricts this range exclusively to 5-7 digits, presents a significant operational risk and will inevitably lead to data integrity issues within the Supplier Meter Registration Service (SMRS). Specifically, restricting the acceptable range to only 5, 6, or 7 digits will necessitate that meters possessing a physical digit count outside this constrained window particularly those with higher counts, such as 8 or 9	Thank you for your comments. The Code Manager and BSC have decided not to widen the range at this time (please see further information in response to Q2). This Change Proposal is only looking at Displayed Register Digits, not Register Digits. SMETS2 meters are often configured to have 8-9 Register Digits, but still only 5 or 6 Displayed Register Digits as mandated by SEC Change SECMP0006.

	digits are incorrectly assigned an invalid, lower specification (e.g., defaulting to 5 digits) during the registration process. This mandatory misrepresentation creates a critical data mismatch. The fundamental discrepancy will exist between the meter's true physical characteristic (the actual number of register digits) and the corresponding data recorded in SMRS. Such an error in foundational meter data can have cascading negative effects on subsequent processes, including accurate settlement, change of supply reads, and reconciliation, ultimately undermining the reliability of the national metering database. Therefore, to ensure accurate data capture, prevent systemic errors, and maintain the integrity of the SMRS, the accepted range for meter digit count must be expanded to fully accommodate all existing meter specifications, specifically 1-9.	Evidence was provided at the work group on 05 February 2026 of a significant number of meters with 7 Displayed Register Digitals, but none for 8 or 9. SEC have confirmed they expect that any SMETS2 meters which do not conform to SECMP0006 could be re-configured to show the correct Number of Displayed Register Digits via firmware update.
Centrica (Energy Supplier)	Yes, we believe this is an appropriate range.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	N/A	n/a

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**
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we believe that this will allow the progression of outstanding data cleanse activity therefor aligning meter details ahead of migration.	Thank you for your comments.
St Clements Services (MPRS Provider)	Yes, providing that the validation is aligned for the D0312 and IF-005 to avoid conflicts.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes- providing that the validation is aligned between D0312 and IF-005, to avoid the conflicts mentioned in Q2 response.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, on the condition that the validation is aligned for the D0312 and IF-005 to avoid conflicts.	Thank you for your comments.
E.ON Next (Energy Supplier)	No. While it unblocks some meters for migration, it creates a "ticking time bomb" for post-migration billing. If a meter is registered with fewer digits than it physically possesses, it will cause a significant, erroneous increase in consumer bills once the meter clocks past 99,999 The proposed approach, while offering a short-term solution by unblocking certain meters and allowing them to proceed with the migration process, introduces a major, systemic vulnerability into the post migration landscape. The core problem arises when a meter is incorrectly registered in the new system with fewer active digits than the	Thank you for your comments. The Code Manager and BSC have decided not to widen the range at this time (please see further information in response to Q2). The Code Manager does not believe this should lead to any clock over issues as BSCP504 and BSCP701 specifies that where the Number of Register Digits is longer than the Number of Displayed Register Digits, the

	physical meter device actually possesses. For instance, a 6 digit meter might be registered as a 5 digit meter. This discrepancy remains dormant until the meter's consumption crosses the maximum value allowed by the shortened registration (e.g., passing 99,999 in the 5 digit example). At this critical juncture, the system will incorrectly interpret the meter's rollover. Instead of registering the correct reading (e.g., 100,000) and calculating consumption based on a true full cycle rollover, this will lead to a significant miscalculation. This error will inevitably cause a significant and erroneous increase in the calculated consumption and, consequently, a massive, inaccurate spike in the consumer's bill. Such an event will not only lead to consumer complaints and a loss of trust but will also necessitate significant, costly remediation efforts to correct billing records across a wide portfolio of affected accounts.	Number of Register Digits should be truncated.
Centrica (Energy Supplier)	Yes, we agree.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	As long as validation is aligned across legacy and non-legacy flows.	Thank you for your comments.

Question 7:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	Our service providers are currently working to a June delivery date for this change.	Thank you for your comments.
St Clements Services (MPRS Provider)	We require R0300 to be aligned to BSC CP1622 which is currently targeting June 2026.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes- providing that the validation is aligned between D0312 and IF-005, to avoid the conflicts mentioned in Q2 response.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We would take guidance from SCS in this instance and from what we can see R0300 needs to be aligned to BSC CP1622 which is currently targeting June 2026.	Thank you for your comments.
E.ON Next (Energy Supplier)	We can meet the June 2026 "Big Bang" implementation. However, we emphasise that the resource required to fix the resulting billing errors and data mismatches post-migration will be significant if the solution is not expanded to 9 digits	Thank you for your comments.
Centrica (Energy Supplier)	We expect a minor change to our Metering Services build to enable the new rules for the D0312.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	This must be aligned to BSC CP1622	Thank you for your comments.

Question 8:	Are you aware of any constraints on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	There is a requirement for CP1622 and the associated REC change R0300 to 'Go-live' on the same date to ensure that the validation works across legacy and migrated MPANs. Although in isolation this is a medium effort change for June 2026 go-live, this CP and other proposed industry changes need to be prioritised across both BSC and REC to ensure there is capacity to deliver change in SMRS that is fundamental to achieving M15.	Thank you for your comments. REC and BSC will be aligning implementation dates across CP1622 and R0300. However after discussions with the MHHS program, this issue is no longer seen as a blocker to migration.
St Clements Services (MPRS Provider)	Must be delivered in line with BSC CP1622	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	For SCS, the MPRS provider, to ensure delivery of the solution R0300 this change must be in alignment with BSC CP1622.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Needs to be delivered in line with BSC CP1622.	Thank you for your comments.
E.ON Next (Energy Supplier)	The solution must align with the BSC CP1622 release. Clarity is needed on why the digit capacity cannot be expanded to match the meter's physical configuration on-site up to 9 digits. Specifically, is this limitation imposed by SMRS system constraints? This must be clearly explained so that all parties can fully comprehend any physical or system constraints preventing the required update.	Thank you for your comments. This Change Proposal is only looking at Displayed Register Digits, not Register Digits. SMETS2 meters are often configured to have 8-9 Register Digits, but still only 5 or 6 Displayed Register Digits as mandated by

		SEC Change SECMP0006. Any changes to the Number of Displayed Register Digits allowed would need to be reviewed via a SEC Change.
Centrica (Energy Supplier)	We have not identified any constraints.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	This must be aligned to BSC CP1622	Thank you for your comments.

Question 9:	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**
Scottish Power Energy Networks (Distribution Network Operator)	N/A. As a DNO, we are already qualified.	Thank you for your comments.
St Clements Services (MPRS Provider)	MPRS is critical in delivering the MHHS Migration Plan. Any changes to the MPRS code during MHHS Migration increase the risk of introducing defects which could impact MHHS Migration.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Although there is no immediate risk, any change to MPRS code may increase the risk of introducing defects which could impact MHHS Migration.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Again, this would be dependant on SCS being able to implement the changes required. MPRS is critical in delivering the MHHS Migration Plan. MPRS is critical in delivering the MHHS Migration Plan. Changes to MPRS code during MHHS Migration increase the risk which could impact MHHS Migration.	Thank you for your comments.
E.ON Next (Energy Supplier)	Yes Due to a significant risk that the appropriate solution will not be ready in time for us to meet our obligations within the migration plan, we are not currently including these specific meter types in the ongoing migration.	Thank you for your comments. The MHHS program has now removed this from their migration exclusion list. Please refer to other Code Manager comments within this document.

	The primary and most significant risk stemming from this issue is widespread consumer detriment. Should meters migrate to MHHS with the incorrect digit configurations, we anticipate a cascade of negative consequences that will directly impact our customers and strain our operational capacity. The most immediate and foreseeable effect is a substantial increase in customer complaints, driven by inaccurate billing resulting from the fundamental data error. Billing failures will occur because the incorrect meter configurations will prevent accurate consumption data processing and correct settlement. Furthermore, this situation will impose a heavy and unsustainable drain on supplier resources. Resolving these issues will require extensive manual intervention to: • Manually correct accounts: Operations teams will have to individually trace, verify, and correct the digit configurations for every affected meter, a time-consuming and error-prone process. • Settle disputes: Once billing failures trigger complaints, customer service and disputes teams will be heavily occupied in investigating, resolving, and recalculating bills, leading to prolonged resolution times and potential regulatory issues. • Manage backlogs: The sheer volume of manual corrections and complaint resolution will inevitably lead to service backlogs, further exacerbating customer frustration and operational inefficiency. Ultimately, the failure to ensure correct digit configurations during migration directly threatens customer trust, increases operational costs, and exposes the company to reputational and potentially regulatory risk	

	due to widespread service failure and consumer dissatisfaction. The long clock round time for meters reaching 99,999 poses a significant risk to settlement performance. Although the transition to a four-month settlement period will allow Suppliers to bill customers accurately, they will struggle to recover the correct settlement costs due to this issue.	
Centrica (Energy Supplier)	We have not identified any risks to our qualification or migration plans.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	We are aware of the response from our Service Provider, SCS, and are supportive of their comments.	Thank you for your comments.

Question 10:	1Would 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**
Scottish Power Energy Networks (Distribution Network Operator)	n/a	n/a
St Clements Services (MPRS Provider)	n/a	n/a
Northern Powergrid (Distribution Network Operator)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	Costs to implement the proposed solution would be dependant on the costs incurred by SCS.	Thank you for your comments. The Code Manager has received a confidential response from St Clements regarding their costs.
E.ON Next (Energy Supplier)	The only viable solution for the non-compliant 7, 8, and 9-digit meters is a physical exchange for a new, compliant 5 or 6-digit meter. While this involves an upfront cost—approximately £100 for the meter exchange visit and an additional early exchange penalty of around £150 per meter from the Meter Asset Provider (MAP) (as the existing meters are technically functional) failing to act will lead to substantial, continuous	Thank you for your comments. This Change Proposal is only looking at Displayed Register Digits, not Register Digits. SMETS2 meters are often configured to have 8-9 Register Digits, but still only 5 or 6

	costs. These ongoing costs stem from managing the consequences of billing errors, repeated manual data corrections, and the necessity for increased customer service resources. Our analysis of the current meter landscape has identified a significant operational challenge regarding the configuration of existing metering assets. Specifically, we have a substantial number of meters, currently totaling 14,000 meters where the meter register digits are above the 1-7 digits that are proposed within this change solution. These meters were correct at the point of early SMETS installs, the 2nd generation of SMETS then stipulated that the meters must be 5 and 6. By applying later versions of the SMETS specification to these early installs which were compliant at the time of install or delivery from the factory, is not the right action to take. It's applying a blanket "one rule for all" approach when not all meters fit the rule. It will have implications for accurate billing, data quality, and compliance with industry standards if the correct meter set up does not match the meter set up on site. Rectifying this issue requires a dedicated remediation program involving both physical site visits to change the meter. The estimated cost for addressing this cohort of meters is considerable. Based on current operational expenses, including labor costs for technical staff undertaking site visits and the administrative and technical fees associated with MAP services, the total projected expenditure is £350,000. This figure represents the direct cost incurred solely to visit and update these 14,000 meters to ensure they are accurately reflecting the correct meter digits. Failure to undertake this corrective action will perpetuate data integrity issues and potential regulatory non-compliance risks.	Displayed Register Digits as mandated by SEC Change SECMP0006. Following conversations with the SEC, the Code Manager is under the assumption that the Number of Displayed Registers can be configured via firmware update as required for any that show as outside of the 5 or 6 as mandated by SECMP0006, so there would not be a need for these meters to be exchanged. The Code manager has also reached out to this respondent to gain clarity on if these 14,000 meters with 8 and 9 digits are Register Digits or Displayed Register Digits.

	The cost estimate provided solely focuses on the direct expenses associated with the physical replacement of the meters themselves. It is crucial to understand that this calculation does not incorporate the significant, downstream costs linked to managing customer complaints that will inevitably arise from mandated meter exchanges, nor does it account for the internal operational expenditures our teams will incur to complete the necessary corrective actions and logistical processes. If we extrapolate this direct replacement cost across the entire industry, assuming a conservative estimate of 250,000 meters of this specific type are in circulation, the total financial burden placed on Suppliers for the simple act of changing what is, by all technical measures, a perfectly good and functioning meter, is a staggering **£62,500,000.00**. This figure represents only the tip of the iceberg, failing to account for the true total cost to the supply base and, ultimately, to the consumer. REC must consider the broader economic impact and the unwarranted expenditure on replacing reliable infrastructure.	
Centrica (Energy Supplier)	We anticipate a one-off minor cost for our Metering Services to update the system in order to implement the proposed solution.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	n/a	n/a

Question 11:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	We would see an increase in accurate data in this area (this does not have a huge impact on us) which would be useful in dealing with customer/supplier enquiries. It would also reduce the number of supplier queries on why updates have been rejected on the system.	Thank you for your comments.
St Clements Services (MPRS Provider)	n/a	n/a
Northern Powergrid (Distribution Network Operator)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	A couple of benefits that would come from this change are: - Supports smoother MHHS migration as it reduces the volume of problematic MPANs entering MHHS. - Creates consistency across codes.	Thank you for your comments.
E.ON Next (Energy Supplier)	Only a marginal reduction in the current 80 exceptions per week. These benefits are largely offset by the long term risks of incorrect billing Crucially, the limited operational benefits derived from this minor decrease are significantly and largely offset by the serious long term risks associated with potential incorrect customer billing. This trade off presents a significant challenge, as prioritising a minor efficiency gain	Thank you for your comments.

	could introduce major downstream consequences, including increased customer dissatisfaction, regulatory non compliance issues, and the substantial operational cost of retrospective billing corrections and rectifying potentially erroneous financial records over time. Therefore, the long term integrity of the billing system and the accurate financial representation for our customers outweigh the negligible immediate benefit of a small reduction in exception handling.	
Centrica (Energy Supplier)	Yes, the proposed solution reduces the likelihood of exceptions during MHHS migration by enabling the validation of the ~250k SMETS2 meters identified within the Data Cleanse working group. These improvements benefit both our day-to-day processes and the wider market through more reliable and accurate data exchange.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	No	Thank you for your comments.

Question 12:	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**
Scottish Power Energy Networks (Distribution Network Operator)	SPEN are supportive of this change.	Thank you for your comments.
St Clements Services (MPRS Provider)	I understand this change is required for Supplier MPANs with non-compliant SMETS2 meters to be able to migrate to MHHS. Given that all MPANs must be migrated to meet M15 and the high volumes of impacted MPANs it seems sensible to make the change. Although, in isolation this is a medium effort change for June 2026 go-live, this CP and other proposed industry changes need to be prioritised across both BSC and REC to ensure there is capacity to deliver change in MPRS that is fundamental to achieving M15.	Thank you for your comments. After discussions with the MHHS program, this issue is no longer seen as a blocker to migration.
Northern Powergrid (Distribution Network Operator)	We agree that the change should be made, to ensure supplier migration issues with SMETS meters are resolved and that all MPANs are able to migrate, to meet M15. However, though in isolation this is a medium effort change for June 2026 implementation, this CP and other proposed industry changes need to be prioritised across both BSC and REC to ensure there is capacity to deliver changes in MPRS that are fundamental to achieving M15.	Thank you for your comments. After discussions with the MHHS program, this issue is no longer seen as a blocker to migration.
National Grid Electricity Distribution (Distribution Network Operator)	We believe that this change is required for Supplier MPANs with non-compliant SMETS2 meters to be able to migrate to MHHS. Due to the	Thank you for your comments.

	fact that all MPANs must be migrated to meet M15 and the high volumes of impacted MPANs it seems that it would make sense to make this change.	After discussions with the MHHS program, this issue is no longer seen as a blocker to migration.
E.ON Next (Energy Supplier)	The change is necessary to allow migration, but it is insufficient in its current form. We champion a move to a 1-9 digit range to fully protect consumers and market integrity However, in its current limited scope, the change is fundamentally insufficient to deliver the robust protection and future proofing required for a stable and fair energy market. To fully protect both individual consumers from potential errors and market abuse, and to safeguard the integrity of the market's foundational data structures, we strongly recommend a comprehensive move to a wider 1-9 digit range for the relevant identifier. This expanded range is essential not only to ensure smooth and error free operation during the immediate migration but, more crucially, to provide long term resilience and scalability in the face of future growth and evolving regulatory requirements.	Thank you for your comments. The Code Manager disagrees with the assessment that this Change Proposal is not future proof, as any change to the Number of Displayed Register Digits would require a SEC Change. Part of that Change Proposal would need to include updates to the validation that would be progressed in a cross-code change.
Centrica (Energy Supplier)	Yes, we are supportive of this change.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	Yes, but are supportive of the comments from our service provider SCS highlighting the need to prioritise changes across REC and BSC to ensure capacity to deliver change fundamental to achieving M15.	Thank you for your comments.

Question 13:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	There is a requirement for CP1622 and the associated REC change R0300 to 'Go-live' on the same date to ensure that the validation works across legacy and migrated MPANs.	Thank you for your comments.
St Clements Services (MPRS Provider)	n/a	n/a
Northern Powergrid (Distribution Network Operator)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	NA.	n/a
E.ON Next (Energy Supplier)	We recommend that REC give serious reconsideration to the proposed 7-digit cap on meter register digits. The fundamental principle of accurate customer billing and accurate settlement dictates that the charges levied must precisely reflect the consumption data that the consumer can physically observe on their meter display. The current limitation, which would incorrectly register a meter with 7 or more digits as having only 5 digits, introduces a severe and wholly foreseeable risk of customer detriment. The critical issue arises when a high digit meter inevitably "clocks over," meaning the reading exceeds the 5 digit capacity recorded in the system. When this occurs, the Suppliers billing system, relying on the erroneous 5 digit registration,	Thank you for your comments. Please refer to all previous Code Manager comments.

	will calculate an unrealistically massive and fundamentally incorrect consumption figure. This will result in the customer receiving a huge bill that bears no relation to their actual energy usage. This situation is not a hypothetical, low probability risk; there will be customer detriment. This issue should be addressed now rather than attempting to resolve thousands of billing errors post migration. Correcting the system now to accommodate the full range of meter reading digits, including 7 digit and higher meters, is a preventative measure ensuring billing accuracy, and avoiding a massive, resource intensive administrative burden of managing and rectifying billing complaints and disputes across the industry. We must ensure that the foundational data used for billing is accurate to prevent this avoidable negative impact on consumers.	
Centrica (Energy Supplier)	We have no additional comments.	n/a
UK Power Networks (Distribution Network Operator)	No	n/a