RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0190 RELATED METER POINT RMP STATUS RULES

On 19 September 2025 Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0190 Related Meter Point RMP status rules.

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	1.0
RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	27 October 2025
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	19 September 2025
RESPONSE DEADLINE	10 October 2025

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE supports the proposed solution and has no further comments to add.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	As a DNO this is not an area which we are able to provide detailed input, as responsibility primarily sits with the suppliers. From our perspective, we do not foresee a material impact in relation to DUoS billing. The following statement in the Impact Assessment confirms the guidance we would have sought from St Clements. “Both the Data Communications Company (DCC) in their role as the Central Switching Service (CSS) Provider, and St Clements in their role as the MPRS Provider have confirmed they see no impacts to their systems or processes from the implementation of this Change Proposal.”	Thank you for your comments.

Question 2:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE agrees that the proposed solution address the problem statement.	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. Whilst the DCC & St Clements are happy that there see no impacts to their system or processes, this alleviates any concerns that we might have had.	Thank you for your comments.

Question 3:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	We are not aware of any alternative solutions.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	NA.	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**
SSE Energy Supply (Energy Supplier)	We believe all processes and scenarios have been identified as part of this change.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	While the proposed change appears well-considered and both MPRS and CSS providers have confirmed no system impacts, we believe there might be some thought worth giving to the following: - It is unclear how exceptions will be managed if a Secondary Metering Point fails to transition from 'Created' to 'Operational' due to agent appointment issues.	Thank you for your comments. These exceptions would be managed in the same manner as if the transition from Created to Operational failed upon agent appointment for any Metering Point.

Question 5:	Do you foresee any impact to the way you're required to manage Related Metering Points from the implementation of this Change Proposal that has not been identified by the Code Manager?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE does not foresee any impacts to the way you are required to managed Related Metering Points from the implementation of this change	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	As a DNO this is not an area which we are able to provide detailed input, as responsibility primarily sits with the suppliers.	Thank you for your comments.

Question 6:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE does not have any comments regarding the legal text.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	NA.	n/a

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**
SSE Energy Supply (Energy Supplier)	SSE would support a February Implementation??	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	As a DNO this is not an area which we are able to provide detailed input, as responsibility primarily sits with the suppliers. From our perspective, we do not foresee a material impact in relation to DUoS billing. The following statement in the Impact Assessment confirms the guidance we would have sought from St Clements. "Both the Data Communications Company (DCC) in their role as the Central Switching Service (CSS) Provider, and St Clements in their role as the MPRS Provider have confirmed they see no impacts to their systems or processes from the implementation of this Change Proposal."	Thank you for your comments.

Question 8:	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**
SSE Energy Supply (Energy Supplier)	SSE does not foresee any risks to their MHHS qualification migration plans.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	NA.	n/a

Question 9:	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**
SSE Energy Supply (Energy Supplier)	B) Up to £9,999	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	A.	Thank you for your comments.

Question 10:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	We cannot quantify how often the scenario requiring this change will be needed in the future to establish the benefits, but we welcome any change that can assist the MHHS migration.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Not huge benefits however we might see the following as a result of this change: Better Visibility and Traceability • Clearer relationships between Primary and Secondary Metering Points may improve visibility when investigating network issues or managing connections. Operational Efficiency • Fewer registration anomalies and improved linkage logic could lead to fewer queries or exceptions raised with DNOs, saving time and resources.	Thank you for your comments.

Question 11:	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**
SSE Energy Supply (Energy Supplier)	SSE is happy for this change to be implemented.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	As a DNO this is not an area which we are able to provide detailed input, as responsibility primarily sits with the suppliers. From our perspective, we do not foresee a material impact in relation to DUoS billing. The following statement in the Impact Assessment confirms the guidance we would have sought from St Clements. "Both the Data Communications Company (DCC) in their role as the Central Switching Service (CSS) Provider, and St Clements in their role as the MPRS Provider have confirmed they see no impacts to their systems or processes from the implementation of this Change Proposal."	Thank you for your comments.

Question 12:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE does not have any other comments to add.	n/a
National Grid Electricity Distribution (Distribution Network Operator)	NA.	n/a