RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED INFORMATION REQUEST RESPONSES

I0190 RELATED METER POINT RMP STATUS RULES

On 31 July 2025 the Code Manager issued an information request 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.

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RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	31 July 2025
RESPONSE DEADLINE	22 August 2025

Question 1:	How many new Secondary Metering Points do you expect to link to existing Primary Metering Points over the next two years?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	N/A – DNO are not able to link Primary/Secondary MPANs and create secondary MPANs at the request of the Customer/Supplier depending on the metering/supply configuration.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We cannot accurately forecast this at the moment. However, we do not expect to see significantly large volumes.	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. However, it is likely that this change would necessitate changes to MPRS, and we would therefore look to St Clements for guidance on the appropriate approach.	Thank you for your comments.

Question 2:	Do you feel it would be useful to be able to create relationships between Metering Points where the Primary Metering Point is Operational and the Secondary Metering Point is Created?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	We see the merit in being able to create a relationship at the point of the secondary creation to ensure that the MPANs are aligned, however as this is within the remit of the Supplier to attribute this flag it is not clear how this can be utilised. • It there is no Supplier registered to the secondary MPAN, how is the flag to be assigned? • How will the application of the relationship be validated? • What happens if the Supplier does not register the MPAN? We believe that there would be further investigation required in terms of the CSS process for validation of this change, as we are unsure of how this would be managed in terms of assigning agents etc before registration had completed.	Thank you for your comments. This would only apply for MPANs where the Supplier has already registered for the secondary MPAN (e.g. has a status of Registered in SMRS), it would not apply for MPANs with a status of New in SMRS. This is as per the current validation rules of creating Related Metering Point Relationships, which requires the same Electricity Supplier hold an Active Registration for each Metering Point.
Scottish Power Energy Retail (Energy Supplier)	We agree the process can be useful. However, it is important to note that there could potentially be MHHS impacts where there is no live contract for the secondary mpan that has a status of “created”	Thank you for your comments. This would only apply for MPANs where the Supplier has already registered for the secondary MPAN (e.g. has a status of Registered in SMRS), it would not apply for MPANs with a status of New in SMRS.

		This is as per the current validation rules of creating Related Metering Point Relationships, which requires the same Electricity Supplier hold an Active Registration for each Metering Point.
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. However, it is likely that this change would necessitate changes to MPRS, and we would therefore look to St Clements for guidance on the appropriate approach.	Thank you for your comments.

Question 3:	In what scenarios do you expect to set up a new Secondary Metering Point against an existing Primary Metering Point (rather than linking two new Metering Points)?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	As a DNO we are not party to the Supplier processes, however in our experience the following scenarios are the most common, • Second MPAN for off peak tariff. • Second MPAN for the purposes of DUoS billing.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We expect to have this scenario when a MAP04 process is done to create a new secondary mpan, after a previous one was disconnected.	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. However, it is likely that this change would necessitate changes to MPRS, and we would therefore look to St Clements for guidance on the appropriate approach.	Thank you for your comments.