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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0205 PROVISION OF HALF-HOURLY CONSUMPTION DATA FOR ADVANCED METER ERRONEOUS SWITCHES

On 20 June 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0205 Provision of Half-Hourly Consumption Data for Advanced Meter Erroneous Switches.

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	30 July 2025
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	James Hardy

DATE IMPACT ASSESSMENT ISSUED	20/06/2025
RESPONSE DEADLINE	11/07/2025

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	We have no additional comments on the proposed solution. We agree that the proposal to add an obligation in the REC for the Gaining Supplier to provide HH consumption data to the Losing Supplier for the period during which they were the Registered Supplier is an appropriate way to address the problem statement. We have shared our views on the two proposed templates later in the document.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	There will be situations where HH data is not available. Therefore, we believe a more flexible solution is required, where suppliers can agree between themselves to use total consumption from the register readings to enable them to bill for the period of the ET. This solution only addresses provision of data for customer billing. SSE believes a cross-code solution with the BSC to cover provision of data for settlements is necessary. We understand that a BSC solution using data held in Kinect is being worked on. This means that the proposed I0205 solution may only be temporary. Half Hourly ET customers will need to be manually billed, and so offering the flexibility to agree a consumption value without providing the HH data will simplify the process for both customers and suppliers.	Thank you for your comments. The Code Manager does not believe for Advanced Meters there will be any situations where no HH data (Actual or Estimated) is available. We are adding to the legal text that where the Gaining Supplier has put the MPAN through reverse migration, they can provide register reading data instead of HH data. However Advanced Meters should be HH prior to MHHS and so have a D0268 and D0036s after being reverse migrated, so even in this

		scenario the Code Manager believes it is very unlikely there will be no HH data to provide. At M8, the ET process becomes voluntary for HH Non-MHHS Metering Points so this process will also be required for those MPANs.
Scottish Power Energy Retail (Energy Supplier)	We agree in principle with the proposed solution as it suggests an opportunity to improve billing processes which in our opinion works fine at the moment. Therefore, we do not agree that the change should be progressed in its current form. First, the proposed solution suggests that the gaining supplier will be required to share half hourly consumption data with the losing supplier once the erroneous switch has been agreed within a 5WD period. We do not agree that this obligation should be placed on suppliers. This is because the data collector might remain the same during the erroneous switch period and would have in any case gotten the notification for the change of supply and so will have the half hourly data during the ES which they are obligated to hold for a 40-month period. If on the other hand, the DC gets changed during the ES period, the DC appointed by the gaining supplier can send a market message (D0036/IF-34) to the losing DC to obtain the half hourly data for the period of supply. Also, the proposed solution suggests that the losing supplier should share the data with the gaining supplier within 5 WDs after the ES is agreed. This is not feasible as two parties can agree that an ES has occurred with the Change of Supply occurring at a future date outside of the 5 WD SLA period which would make supplying the Half Hourly data at that point meaningless. Therefore, should this change progress, this	Thank you for your response. This Change Proposal has been raised due to difficulties with the current process. The Code Manager will further discuss the obligations at the August Change Issues Group. However, our position is that this should be the responsibility of the Energy Supplier, not the Data Collector. The Code Manager will further discuss this at the August Change Issues Group to gain further input from Market Participants ahead of the solution refinement for the consultation.

	should be changed to reflect that the Half Hourly consumption data should be provided within 5WDs of the Supply Switch date and not the ES agreed date. Finally, the proposed solution suggests a manual workaround of uploading data through SDEP on an excel sheet. The effect of this would require parties to make system changes to systems to account for the manual upload of this data when received which cannot be achieved between now and the proposed November implementation date. Therefore, we believe this change should be rejected and the Code Manager should continue to work with Elexon to understand if the data can be provided through their Kinnect Insight Platform	The Code Manager is happy to discuss further the impacts of any potential system changes. The Code Manager will continue to engage with Elexon, however, their Kinnect Insight Platform may not be available for 18-24 months. As such, an interim approach, that is proposed under I0205, is required.

Question 2:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	Yes, the proposed solution addresses the problem statement.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE agrees the solution does address the problem statement, but please refer to our answer in Q1.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We do not agree that the proposed solution addresses the problem statement for reasons outlined in our response to Q1	Thank you for your comments.

Question 3:	Do you think we have identified and considered all processes and scenarios that may be impacted through the implementation of this proposed change? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	The proposed solution seems like a lot of manual work for suppliers who are not equipped with the right systems. For instance, some suppliers might have to add data manually to comply with the CSV format. The responses to this impact assessment will highlight if suppliers are equipped enough to implement this change and if they will need any further support.	Thank you for your comments. The Code Manager will take into consideration any potential system changes required by Energy Suppliers when proposing an implementation date.
SSE Energy Supply (Energy Supplier)	As per question one we feel SSE believe this solution is for billing only. A cross-code solution with the BSC for it to cover provision of data for settlements is required.	Thank you for your comments. The scope of this solution is for billing only, as this needs to be in place as soon as possible after MHHS go-live. The Code Manager encourages any Party to submit a new change to either REC or the BSC to look at a solution for settlement arrangements post an ET.
Scottish Power Energy Retail (Energy Supplier)	No comments at this time	Thank you for your comments.

Question 4:	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**
Brook Green Supply (Energy Supplier)	While we support the current solution outlined in the impact assessment, we believe a more effective and enduring solution would be to provide HH consumption data via Elexon's Kinnect Insight Platform API. However, as this will not be available at the time of MHHS go-live, we agree that the current proposal is a suitable interim solution.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	From MHHS go live to milestone M14 there will be suppliers reverse migrating their gained sites, which would mean that there is no data available to pass to the losing supplier. If this change is going to be implemented, it should not be before milestone M14.	Thank you for your comments. This change is required as soon as possible after MHHS M8, as at M8 the ET process becomes voluntary for HH Non-MHHS Metering Points. This process will also be required for those MPANs.
Scottish Power Energy Retail (Energy Supplier)	As stated in our response to Q1 we agree with the principle of the change. However, we do not support its progression in its current form.	Thank you for your comments.

Question 5:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	We have no additional comments. We agree with the legal text change.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	As per the above, some suppliers will be reverse migrating their gained sites, which would mean that there is no data available to pass to the losing supplier. Some suppliers may be billing to registered reads rather than HH data, which could mean they do not have the data required for this change. We think the legal text should read where available: For Advanced Electricity Meters, once the Losing Supplier has re-registered the RMP, the Gaining Supplier must provide the Losing Supplier with either the Half-Hourly consumption data or the total consumption held (actual or estimated) for the period they were the Registered Supplier. This must be provided using Market Messages PT0047 Erroneous Transfers General Query (Elec) within SDEP using the template provided by the Code Manager in Appendix XX	Thank you for your comments. Please see the Code Manager's comment to Q1.
Scottish Power Energy Retail (Energy Supplier)	The legal text is the operative instrument that defines the proposed SLAs which suppliers are to follow and it does not include the SLAs in its current version.	Thank you for your comments. The Code Manager will amend the legal text to clearly state the proposed 5 Working Day SLA.

	REC text "*For Advanced Electricity Meters, once the Losing Supplier has re-registered the RMP, the Gaining Supplier must provide the Losing Supplier with the Half-Hourly consumption data held (actual or estimated) for the period they were the Registered Supplier. This must be provided using Market Messages PT0047 Erroneous Transfers General Query (Elec) within SDEP using the template provided by the Code Manager in Appendix XX*". SP proposed text "*For Advanced Electricity Meters, once the Losing Supplier has re-registered the RMP, the Gaining Supplier must provide the Losing Supplier with the Half-Hourly consumption data held (actual or estimated) for the period they were the Registered Supplier within 5 working days. This must be provided using Market Messages PT0047 Erroneous Transfers General Query (Elec) within SDEP using the template provided by the Code Manager in Appendix XX*".	

Question 6:	Do you have any comments on the proposed reporting templates to be shared between Energy Suppliers via SDEP, including a preference between the two draft template designs? Respondents are also invited to share their own template designs to be considered by the Code Manager as part of this impact assessment?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	We would appreciate clarification on whether we are required to provide the 'Read Type' values: AI, RE and RI. Additionally, we note some inconsistencies between the templates – For example, Template 1 does not include a field for 'Read Type', whereas Template 2 does. Hence, there is inconsistent data/information required by the two templates. However, given the current format of the templates, we would prefer template 1 over template 2 because it is a simpler format to comply with.	Thank you for your comments. The difference in templates was to allow Market Participants to express their opinions on different possible options. The Code Manager will discuss the templates further at the August Change Issues Group to finalise a single template ahead of consultation.
SSE Energy Supply (Energy Supplier)	SSE preferred template 2, but believe additional columns should be included, to indicate whether data is estimated or actual. This template should only be required where agreed between suppliers. The facility to provide total consumption data, where agreed as an alternative solution, should be available.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	It will be beneficial if we can have a single template that incorporates all required information. While we do not support this change because of reasons stated above. However, if this should progress, we would prefer the reporting to be done on template 2.	Thank you for your comments.

Question 7:	Do you agree with the 5 Working Day SLA for the Half-Hourly Consumption Data (as included in the interface table in the draft legal text) to be shared between the Gaining and Losing Supplier? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	Yes, 5 Working Day SLA is enough for the HH Consumption Data to be shared between the Gaining and Losing Supplier.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	As the ET period could be for an extended period and billing is manual using HH data, SSE feels this should increase to a 10 working day SLA.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We agree with the five working day SLA period. However, as we have highlighted in our response to Q1, this should be amended to reflect after the change of supply date and not the Erroneous transfer agreed date.	Thank you for your suggestion. The Code Manager will discuss this at the August Change Issues Group to gain further input from Market Participants.

Question 8:	Please provide any preference(s) on how the Code Manager should appropriately assure that the Half-Hourly consumption data is appropriately shared between Energy Suppliers, including within the proposed SLA.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	To ensure the Half-Hourly consumption data is appropriately shared between Energy Suppliers, the Code Manager should implement clear, transparent, and enforceable protocols such as Data Accuracy, Secure Data Sharing, Defined Timelines, Dispute Resolution Mechanism, Roles and Responsibilities.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	If the supplier fails to provide the HH data within the SLA, an escalation route should be available within the SDEP. There should be no additional burden placed on suppliers for reporting.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	It would be beneficial if the Code Manager can create a separate working solution to appropriately monitor the process for which this activity is carried out. If this change progresses, Suppliers would be obligated to share information via SDEP using the PT0047 Process Type which is currently used to monitor the Erroneous Transfer processes. It would be beneficial if the Code Manager can demonstrate how it is going to appropriately monitor compliance out with what the PT is currently used for. We believe this can create complications that might affect the current assurance reporting for the ET general query process on SDEP.	To enable the timely implementation of this Change Proposal, the Code Manager has proposed using the existing Process Type PT0047. Introducing a new Process Type would significantly delay implementation due to the time required for its creation, which could result in increased consumer detriment. PT0047 has been selected as it is the most appropriate existing Process Type, and the volume of queries related to I0205 is expected to be low.

Question 9:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	The lead time required to implement the proposed solution will depend on the time needed to develop an internal reporting framework. We would like to emphasise the importance of providing all suppliers with sufficient notice ahead of the go-live date to allow for adequate preparation.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE would need 6 months lead time. However, due to issues with reverse migrations, we do not feel this should not be implemented until M14 (currently 28/10/26).	Thank you for your comments. Please note, this change is required as soon as possible after MHHS M8, as at M8 the ET process becomes voluntary for HH Non-MHHS Metering Points. This process will also be required for those MPANs.
Scottish Power Energy Retail (Energy Supplier)	We do not support the proposed November implementation date. If this change is progressed, we would be required to make some IT changes to our systems to account for the manual upload of the data that would be received from the losing supplier. This would require some time before this can be fully operational. We suggest a June 2026 implementation date so we can adequately make the required system changes	Thank you for your comments.

Question 10:	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**
Brook Green Supply (Energy Supplier)	No, we do not foresee any risks to our qualification or migration plans to be delivered as part of MHHS implementation caused by the delivery of this change.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No, SSE does not foresee any risks to our qualification or migration plans as a result of this change.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	The change is proposed for go-live in the middle of the qualification/migration process when we would have a significant part of our resource working on the MHHS project. The system changes required may impact these processes.	Thank you for your comments.

Question 11:	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 £49,000; D) Between £50,000 and £99,999; or E) More than £100,000	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	A) Nil	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We cannot accurately forecast the cost implications to our business for now. However, we believe this would be anywhere between B and C.	Thank you for your comments.

Question 12:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	We, currently or in the past, have not received many Erroneous Switches. Hence, this change will not yield material benefits to our organisation. However, we still believe that this change needs to be made to prevent incorrect billing and a poor consumer experience.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	This will enable us to accurately invoice our Advanced meter customers.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	We have not identified any benefits to our business through this proposed change. We already have processes to ensure that we do not bill for any erroneous switches once identified and this obligation should rather be placed on the data collector not suppliers.	Thank you for your comments.

Question 13:	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**
Brook Green Supply (Energy Supplier)	Yes, this change should be made.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	This change may be only short term as it could be superseded by a BSC solution using Kinnect data. Therefore, we feel this change should only be implemented with our suggested amendments.	Thank you for your comments.
Scottish Power Energy Retail (Energy Supplier)	For reasons outlined in Q1, Q9 we do not agree that this change should be made.	Thank you for your responses.

Question 14:	Do you have any other comments relating to this Issue?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Brook Green Supply (Energy Supplier)	NA	n/a
SSE Energy Supply (Energy Supplier)	No	n/a
Scottish Power Energy Retail (Energy Supplier)	We have no further comments to make at this stage.	n/a