RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

NON-CONFIDENTIAL CONSOLIDATED INFORMATION REQUEST RESPONSES

I0230 D0303 FLOW FOLLOWING MHHS DESIGN CHANGES

I0261 ADDITION OF EXPORT FLAG IN D0303 FLOWS

On 07 November 2025 the Code Manager issued an information request to industry to seek feedback on the proposed solution for I0230 D0303 flow following MHHS design changes and I0261 Addition of Export flag in D0303 flows.

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	11 December 2025
RESPONSIBLE COMMITTEE	Technical Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE INFORMATION REQUEST ISSUED	07 November 2025
RESPONSE DEADLINE	05 December 2025

Question 1:	Please rank solution options 1 through 4, providing reasoning for which is your preferred solution to be implemented.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica Smart Meter Assets (Meter Asset Provider)	Centrica Smart Meter Assts (CSMA) believe that the best solution would be solution 4, with 2, 1 and 3 following in order of preference. The main reason for raising this change request was to allow MAPs a way to identify and exclude installation flows on export meter points. Solution 4 is the only solution proposed that will facilitate this. Solutions 1 through to 3 only provide data after the flow has been received. This would mean holding flows that require intervention and then at the agreed upon interval resolving these issues. This has the potential to create other impacts with churn evens and regular installations and removals as there is no way to segregate these export MPAN issues with other issues until MAPs know which ones are export MPAN issues. The collateral of opting for any solution other than solution 4 has the potential to also lead to increasing volumes of billing inaccuracy.	Thank you for your comments. The Code Manager believes solution option one means a D0303 could be checked within minutes of receipt if desired or could be checked as and when required without a D030 being received. We will however keep this in mind more for solution options two and three.
IMSERV (Metering Equipment Manager)	As a MEM our Solution preferences in order are: **Solution Option No 1.**	Thank you for your comments. If solution option four is progressed, the Code Manager will keep in mind throughout solution development how this Data Item would be populated by MOAs.

	This solution means MAPs can control the data they need and no expensive and impractical changes to the D0303 are required – (1 & 2 have the same outcome). **Solution Option No 2.** As above, this solution means MAPs can control the data they need and no expensive and impractical changes to the D0303 are required – (1 & 2 have the same outcome). **Solution Option No 3.** This solution doesn't solve all the issues described, as a result expensive and impractical changes to the D0303 would still be required. **Solution Option No 4.** This option isn't an appropriate solution for the issues described, it doesn't resolve I0230 so additional reporting is still required, and that same additional reporting can solve both issues. If I0261 (export flag) was added to the D0303 this means MEMs would need to make costly and time-consuming changes to both NHH/HH as well as ADS/MSS databases. Consider that due to MHHS legacy markets (HH/NHH) software development has been frozen for some time (i.e. Wheatley MOP), so making structural flow changes at this late stage would be very difficult if not imposable. Also consider that this solution is asking the MEMs to populate an 'export flag', this isn't an existing data item in the HH/NHH market, MEMs are not told if the DNO has registered an MPAN as Import or Export.	

	When the MPAN is traded as HH/NHH the solution is asking the MEM to make an educated guess to say if the MPAN is Import or Export, this seems inappropriate and potentially problematic i.e. if/when the MEM export flag conflicts with ESS data.	
Anonymous (Meter Asset Provider)	Our preferred solutions would be 3, 2,1,4 The reason we prefer 3 is we believe that this is an issue for MAP to resolve with the EES	Thank you for your comments.
Anonymous (Meter Asset Provider)	1. Option 4 (Update D0303): Fixes I0261 in a lasting way, helping keep our portfolio accurate. This option also avoids uncertainty of multiple MPANs on one serial number. 2. Option 2 (Whole portfolio extracts): Useful as we will obtain all data on all assets in one report. 3. Option 3 (MHHS extracts only): Seems similar to option 2 but wouldn't be a full report so not as preferable as option 2. 4. Option 1 (Use EES API): Works but could slow things down for all MAPs and other API users.	Thank you for your comments.
Anonymous (Metering Equipment Manager)	1. MAPs use the Electricity Enquiry Service (EES) API to get the Supplier Effective From Date and Direction of Energy Flow. a. This approach enables MAPs to access both pieces of information simultaneously, providing the most efficient interim solution until the Supplier Effective From Date is reinstated in the D0303 data flow. Furthermore, API access gives MAPs complete visibility of their portfolio without relying on Market Messages	Thank you for your comments.

	2. Update the D0303 to add export flag, combined with one of the above options for Supplier Effective From Date. a. As a long-term solution, this approach makes sense; however, the preference would be to implement changes to the D0303 in a single update rather than in two separate phases. Additionally, it would be more logical to allow MOPs to pass through the Energy Direction Data Item for all MPANs, not just those that are export. 3. Provide MAPs with regular whole portfolio extracts from EES. a. Change of Supplier can happen at pace, any EES extract will quickly become historic information. 4. Provide MAPs with regular portfolio extracts from EES for MHHS Metering Points only. a. Change of Supplier can happen at pace, any EES extract will quickly become historic information.	

Question 2:	If you chose solution option 4 as your preferred solution option, which of options 1 through 3 is your preference for receiving Supplier Effective From Date?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous (Meter Asset Provider)	Solutions 1 through 3 are undesirable as means of receiving effective from dates. They are either labour intensive, expensive to implement or are not fit for purpose, delivering information only after the fact. All these impacts will be felt by energy suppliers, and the potential increased cost to serve will eventually filter down to the end consumer. Solution 1 requires substantial investment in technology to access the API at the scale required. The API requests are on a per meter basis. Requiring MAPs to parse the API for every churn event would require a fundamental redesign of MAP systems. Solution 2 is something that we currently pay for, as do other MAPs, and holds a major flaw, which is that no effective from date can collected until the data is collated and ready to be shared with the MAP, with no means of advanced notification. This will create essentially a cycle where data needs to be processed all in one go, as opposed to distributed evenly throughout the month and depending on frequency and time in the month the data is received may create impacts on MAP's ability to validate churn events prior to billing. Thus, leading to increased billing inaccuracy. Solution 3 carries the same issues as solution 2 but leads to the added complexity that there are two processes that need to be followed for	Thank you for your comments. The Code Manager will make sure it is clear these are expected to be a temporary solution for I0230, but that is dependent on a BSC solution to add Effective From Date to the IF-036 Market Message. As this is outside of the REC Code Manager's control and not a 100% certainly to happen/be approved, we cannot state 100% for sure any solution under I0230 will be temporary, only that it is likely to be.

	ESME flows, and no way to identify which process to follow until receipt of the monthly reporting. Of the three solutions suggested to provide a MAP with a way to collect effective from dates, solution two is the most preferable, however there are significant issues with this solution, to the point that it could be argued that it does not resolve the issue highlighted in I0230. Lastly, in the background of I0230, it is said that a temporary solution is needed, and this is not made clear in either the solution approach or consultation questions. Without clear indication that this is a temporary solution whilst a change is raised with BSC, this ambiguity potentially harms the success of that change.	
IMSERV (Metering Equipment Manager)	n/a	n/a
Anonymous (Meter Asset Provider)	N/A	n/a
Anonymous (Meter Asset Provider)	Option 2 would be the preference as we will have the required data in one report.	Thank you for your comments.
Anonymous (Metering Equipment Manager)	We do not believe the D0303 Data Flow is the most appropriate method for receiving an Export Flag, as this information is already available in EES and can be sourced directly from there. If the D0303 were to be used, rather than introducing an Export Flag, it would be more practical for MOPs to pass through the Energy Direction Data Item for all MPANs, rather than limiting it to export MPANs only	Thank you for your comments.

Question 3:	Are there any alternate solutions that have not been proposed by the Code Manager you wish to be considered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous (Meter Asset Provider)	No.	Thank you for your confirmation.
IMSERV (Metering Equipment Manager)	No, reporting/API from EES is an appropriate solution	Thank you for your confirmation.
Anonymous (Meter Asset Provider)	If solution 4 is taken then the issue between IF-036 and the D0303 should be resolved so only 1 change is needed for the flow, especially as the information can continue to be sourced from the EES	Thank you for your comments.
Anonymous (Meter Asset Provider)	We have no further comment	Thank you for your confirmation.
Anonymous (Metering Equipment Manager)	If the D0303 were to be used, rather than introducing an Export Flag, it would be more practical for MOPs to pass through the Energy Direction Data Item for all MPANs, rather than limiting it to export MPANs only. This would be a straight passthrough of information received via the IF-033. This solution does not fully consider the one-time energy direction change that the MHHS Design caters for.	Thank you for your comments.

Question 4:	Do you have any comments on the descoped solution options laid out by the Code Manager you wish to submit?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous (Meter Asset Provider)	Descoping returning the effective from date to mandatory data as it requires a change to be raised with BSC as well, and it is taking over a year for this to be passed onto MAPs since the change was raised, is incredibly bad communication. It also creates an unnecessary delay in agreeing a solution.	Thank you for your comments. The Code Manager cannot look at making the Effective From Date mandatory when there is no way for MOAs to provide it. We are aware there are discussions happening under the BSC to add this Data Item to the IF-036 Market Message, and we will continue to monitor its progress via the Cross Code Steering Group (CCSG). Adding it to the IF-036 for M8/M10 did not meet the threshold required for changing the design at the time this was flagged.
IMSERV (Metering Equipment Manager)	None	n/a
Anonymous (Meter Asset Provider)	No we do not	n/a
Anonymous (Meter Asset Provider)	We have no further comment	n/a

Anonymous (Metering Equipment Manager)	Descoped Solution Option 7 has been raised with Elexon and will be progressed in 2026.	Thank you for your comments. The Code Manager is aware there are discussions happening under the BSC to add this Data Item to the IF-036 Market Message, and we will continue to monitor its progress via the Cross Code Steering Group (CCSG).

Question 5:	Do you have any other comments on either of these Change Proposals?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous (Meter Asset Provider)	It is worth adding additional clarification the background of I0261. It states that MAPs would manually need to check the D0303 flow to see if any action is required. This is an oversimplification. Multiple import meter points can be held at the same address. This would not be apparent in a D0303 flow, and if the address matched the initial flow's address, the action would be to contact the energy supplier to identify whether this is a crossed installation or an export MPAN creation, and until that response is received, that issue cannot be rectified.	Thank you for your comments.
IMSERV (Metering Equipment Manager)	None	n/a
Anonymous (Meter Asset Provider)	No we do not	n/a
Anonymous (Meter Asset Provider)	We have no further comment	n/a
Anonymous (Metering Equipment Manager)	No.	n/a