RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0235 MISSING SCENARIO VARIANTS IN D0179

On 06 March 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0235 Missing Scenario Variants in D0179.

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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RESPONSE TYPE	NON-CONFIDENTIAL
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RESPONSIBLE COMMITTEE	Technical Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	06 March 2025
RESPONSE DEADLINE	28 March 2025

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We have queried the requirement to add the scenario variant of DNO to MOA and MOA to DNO as this scenario was removed from the D0179 under MRA CP 2891. The response received was that “DNO to MOA Scenario Variant is needed for MHHS. The MHHS design shows the DNO sending the D0139 and D0179 to the MOA who passes data to the Supplier via the DIP and DTN. This aligns to the wider principle level change that makes the MOA responsible for sharing metering related data rather than DNOs doing it directly “. However, our understanding is that a DNO could send a D0179 in response to a D0180 received but there is no DNO variant on the D0180. We would therefore query if the additional scenarios are required on the D0179 there should also be an associated change to the D0180 or alternatively, that the Schedule 14 is amended to remove the requirement for a DNO to issue a D0179 in line with MRA CP 2891. There is also no Data Item on the D0179 to state why a request to energise a Prepayment Meter has been rejected. Should this Change Proposal progress, we would suggest that data item DI50623 J1253 Failure to Energise or De-Energise Reason Code be added to the D0179.	Thank you for your comments. The Code Manager will be bringing this to the May Change Issues Group to discuss potentially removing the D0179, as it does not appear to be in current use.

Northern Powergrid (Distribution Network Operator)	We do not agree with the solution to add the D0179 scenario variants of DNO – MEM and MEM to DNO, as this is not a current industry process. As a DNO we do not receive requests to amend energisation via D0134 on Domestic Prepayment sites and therefore do not currently utilise the D0179 data flow to advise on a de-energise or energise. We also do not require D0179 updates from the MEM to advise PP meter changes. A majority of site energisation changes requests we receive / complete are non-domestic sites with current transformer metering in situ, where there is a new connection or alteration to the energisation set up required and only DNO operatives can perform the change needed.	Thank you for your comments. The Code Manager will be bringing this to the May Change Issues Group to discuss potentially removing the D0179, as it does not appear to be in current use.
Scottish Power (Energy Supplier)	We agree with the code managers proposal to include two missing Scenario Variants in the Data Specification for sending/receiving the Confirmation of Energisation/De'-'Energisation of Prepayment Meter (D0179/ MM00093). It is important for the DNOs and MEMs to communicate this information to avoid any misalignment of the energisation status. We disagree with the proposal to make the three mandatory Data Items to optional. As a supplier, we need this information to manage our operational processes. We recommend that the three data items should be changed from mandatory to conditional, so when DNOs and MEMs are sharing this information with each other, its okay for these three data items to be optional but when sending this data flow to the supplier, we would like the three data items to be mandatory please.	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**
National Grid Electricity Distribution (Distribution Network Operator)	No we do not agree that the proposed solution addresses the problem statement for the reasons outline in Q1	Thank you for your comments. The Code Manager will be bringing this to the May Change Issues Group to discuss potentially removing the D0179, as it does not appear to be in current use.
Northern Powergrid (Distribution Network Operator)	No, the D0179 process was removed during a historic MRA change and was not expected to be reintroduced to code.	Thank you for your comments. The D0179 process is already in the Code, just not the Data Specification. The Code Manager will be bringing this to the May Change Issues Group to discuss potentially removing the D0179, as it does not appear to be in current use.
Scottish Power (Energy Supplier)	Yes, we agree that due to the missing Scenario Variants in the D0179 data flow/ MM00093 market message, DNOs and MOAs cannot fulfil their obligations listed in Schedule 14 Metering Operations preventing them to send this data flow/market message to all required Parties. We do not support the proposal to change the following three data items	Thank you for your comments.

	within the D0179 data flow/ MM00093 market message from mandatory to optional. • Credit Balance (DI50260/J0537); • Standing Charge (DI50264/J0543); and • Prepayment Unit Rate (DI50263/J0542). We would like for these data items to be changed from mandatory to conditional. When DNOs or MEMs are sending D0179 data flow/ MM00093 market message to each other, these data items would be optional whereas when suppliers are receiving this information, then these data items must remain mandatory. Suppliers are currently using the information received on these data items for their operational business processes and this change proposal should have any impact on the existing supplier processes. The purpose of this change is just to address the problem of DNOs and MEMs not able to fulfil their obligation to send this data flow due to the missing Scenario Variants, so adding the missing scenario variants and making the three data items from mandatory to conditional should address the problem statement.	

Question 3:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We believe that the current proposed solution is not fully formed. An alternative solution would be that Schedule 14 is amended to remove the requirement for a DNO to issue a D0179 in line with MRA CP 2891	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	As the scenario does not exist in the industry, we do not believe the solution is required.	Thank you for your comments.
Scottish Power (Energy Supplier)	The alternate solution would be for DNOs and MEMs to share this information via a spreadsheet but then the process would be manual and would be open for gaps and continued misalignments of the energisation status. We support adding the missing scenario variants to the D0179 data flow/ MM00093 market message, we believe that it is very important for the DNOs and MEMs to communicate changes to the energisation status of the meter to ensure that all parties systems are aligned.	Thank you for your comments.

Question 4:	Do you agree with the updated market message/flows set out in this solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No we do not agree as per our reasons outlined in Q1	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	We do not agree with the changes.	Thank you for your comments.
Scottish Power (Energy Supplier)	We agree with the addition to the missing scenario variants to the D0179 data flow/ MM00093 market message. We do not agree with the proposal to make Credit Balance, Standing Charge and Prepayment unit rate data items from mandatory to optional. We would like the three data items to be conditional, while sending the D0179 data flow/ MM00093 market message to the Supplier, the three data items should remain mandatory. Please see our proposed redline changes on the D0179 data flow/ MM00093 market message. **The Code Manager is unable to copy over the tables provided by Scottish Power without corrupting this document, but they have been received and reviewed.**	Thank you for your comments.

Question 5:	Are you supportive of making Credit Balance (DI50260/J0537), Standing Charge (DI50264/J0543) and Prepayment Unit Rate (DI50263/J0542) Data Items optional within the D0179? Please confirm why or why not.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We would agree that the Data Items should be made optional as not all parties have access to this information to be able to populate them.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	n/a	n/a
Scottish Power (Energy Supplier)	No, we do not support making Credit Balance (DI50260/J0537), Standing Charge (DI50264/J0543) and Prepayment Unit Rate (DI50263/J0542) Data Items optional within the D0179 data flow. Please see our response to the question no 4. As a supplier, we need this information to manage our operational business processes.	Thank you for your comments.

Question 6:	How many D0179s have you sent or received in the past year?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Zero. We have no records of ever having sent or received a D0179	Thank you for confirming.
Northern Powergrid (Distribution Network Operator)	We do not send or receive D0179s (0 in the past year).	Thank you for confirming.
Scottish Power (Energy Supplier)	As a Supplier, we have only sent/received one D0179 over the past year.	Thank you for confirming.

Question 7:	Do you believe the solution appropriately accounts for the industry's move to the new MHHS arrangements?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Our understanding is that Prepayment Key Meters will be phased out as they are replaced with Smart meters under the MHHS arrangements. We do not therefore see that this is an enduring requirement under MHHS arrangements.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	The MHHS arrangements incorrectly include the additional scenario variant. This solution should not be progressed and the MHHS arrangements should be updated.	Thank you for your comments. The Code Manager is investigating the removal of the D0179, however this would be processed as a BAU Change after MHHS go-live. This change does not reach the threshold to change the MHHS design at this late stage.
Scottish Power (Energy Supplier)	Yes.	Thank you for your comments.

Question 8:	Do you have any comments on the DNO to MOA Scenario Variant, noting it was previously removed under MRA change CR2891 but still present in Schedule 14 Metering Operations and in the MHHS design?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Please see our comments in Q1	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Schedule 14 Metering Operations and MHHS should be updated to remove the variant.	Thank you for your comments.
Scottish Power (Energy Supplier)	No, please see our comments/response to the above questions.	Thank you for your comments.

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**
National Grid Electricity Distribution (Distribution Network Operator)	This would require a system and process change therefore we would require a minimum of 6 months to implement this change.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	We are unable to provide detailed timescales for the change but any mandating of the message would require significant industry and internal process change and system development - to cater for a scenario that does not occur.	Thank you for your comments.
Scottish Power (Energy Supplier)	We would like this change to go live in Feb 2026 post MHHS go-live.	Thank you for your comments.

Question 10:	Are you aware of any constraints on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We are aware that this issue has been raised due to an “defect” raised in MHHS SIT, however, as we have highlighted, we have never had to send/receive this flow. We do not believe that SIT/QT should be stalled because of this as it is clearly an inconsequential part of the design. Perhaps the question is whether this should be removed from the design and not retroactively built into the DTN.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	MHHS delivery and ELS would need to be considered for any timescales to implement a change.	Thank you for your comments.
Scottish Power (Energy Supplier)	No but we would like this change to go live in Feb 2026 post MHHS go-live.	Thank you for your comments.

Question 11:	Do you foresee any risks to your MHHS implementation, qualification or migration plans caused by the delivery of this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes. Dependent upon Code Body opinion, this defect may result in work off plans which cannot be completed prior to Go Live	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	We are focusing on MHHS delivery and any other changes in the near term could pose risk to delivery of MHHS changes.	Thank you for your comments.
Scottish Power (Energy Supplier)	To avoid any potential risks to MHHS implementation, qualification or migration plans, we would like this change to go live in Feb 2026 post MHHS go-live.	Thank you for your comments.

Question 12:	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
National Grid Electricity Distribution (Distribution Network Operator)	Yes (C)	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	We are unable to provide detailed costing for the change but any mandating of the message would require internal development, timescales and associated costs.	Thank you for your comments.
Scottish Power (Energy Supplier)	B – for just adding the missing scenario variants to the D0179 data flow/ MM00093 market message and making the three data items conditional rather than optional.	Thank you for your comments.

Question 13:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	None, we do not use the D0179 nor do we see a benefit in creating a process for a meter that is being replaced.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No benefits would be seen in introducing the scenario variants.	Thank you for your comments.
Scottish Power (Energy Supplier)	As a supplier we do not see any benefits, but it is very important for all the parties involved in the process to have the correct energisation status of the meter. By adding the missing scenario variants hopefully, we can achieve this benefit.	Thank you for your comments.

Question 14:	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**
National Grid Electricity Distribution (Distribution Network Operator)	No however, we have to consider the MHHS design should optionality be given to this flow.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No, we are not in agreement with the change.	Thank you for your comments.
Scottish Power (Energy Supplier)	Please see out response to question no 13.	Thank you for your comments.

Question 15:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No further comments.	n/a
Northern Powergrid (Distribution Network Operator)	No comments.	n/a
Scottish Power (Energy Supplier)	We support this change to add the missing scenario variants to the D0179 data flow/ MM00093 market message. We do not agree with the proposal to make Credit Balance, Standing Charge and Prepayment unit rate data items from mandatory to optional. We would like the three data items to be conditional. While sending the D0179 data flow/ MM00093 market message to the Supplier, the three data items should remain mandatory.	Thank you for your comments.