This document is classified as **UNCLASSIFIED**
Information is not restricted

SOLUTION APPENDIX

I0241 - MHHS INCREMENTAL CHANGES FOR GO LIVE – CREATING RELATED METERING POINTS DURING TRANSITION

DATE ISSUED	12/03/2025

SOLUTION LEAD	HARRIET TRUSS
REPORT REVIEWED BY	GLENN SHEERN, SARAH JONES

1 SOLUTION DEVELOPMENT APPROACH

Initially raised under the industry Consultation for R0209 - Implementation of MHHS Arrangements, this potential scope item looks at providing clarity in the MHHS Code Drafting to confirm the assumption that during the MHHS Transition Period a relationship cannot be created between an MHHS Metering Point and a non-MHHS Metering Point.

A review of the MHHS Design and REC MHHS Code Drafting is set out below.

1.1 SOLUTION BACKGROUND – MHHS DESIGN

The Migration Design Document (DEL961), the latest version of which can be found on the Baselined Design Artefacts - MHHS Programme page, states the following with regards to Related MPANs in relation to Migration:

"**9. Related MPANs**

1. Related MPANs will be treated in line with the business rules set out as part of the MHHS BAU Design throughout the Migration period.
2. An IF-031 can only ever be submitted to migrate a Primary MPAN. Any IF-031 that is submitted for a Secondary MPAN will be rejected.
3. Secondary MPANs will automatically be migrated alongside Primary MPANs. Following the appointment of the Service Provider, the Registration Service will send an IF-036 for both Primary and Secondary MPANs.
4. Separate D0170's will be issued for all Primary and Secondary MPANs.
5. The same MS and DS must be appointed to Primary and Secondary MPANs.
6. For Reverse Migration, Primary and Secondary MPANs will undergo a Switch and Migration at the same point in time. A Pending Registration must be received for each

MPAN separately and the Registration Service will not perform any auto-Reverse Migration."

This section does not consider creating new relationships.

Under the MHHS arrangements Related Metering Points will no longer be managed via the DTN Market Message, D0386 Manage Metering Point Relationship (MM00378). New Data Integration Platform (DIP) Market Messages will replace the D0386 to establish and amend Related Metering Point relationships:

- IF-019 (Manage Meterpoint Relationships)
- IF-020 (Manage Meterpoint Relationships Response)

The Migration Design Document considers how relationship creation should be treated during migration and transition under Section 13 'Required Interface Changes to Support Migration Design':

"13.2.7 IF-019

1. The structure of the IF-019 (Manage Meterpoint Relationships) will not change.
2. New validation rule will be applied to the IF-019:
    a. REG9010 – Cannot Manage MPAN Relationships for an Unmigrated MPAN
3. Business Rules:
    a. If a Reverse Migration is underway or MPAN is Legacy and an IF-019 is sent, this will be rejected using REG9010 validation rule. An IF-020 will then be sent back with Response Code (DI-979): R; and Response Message (DI-980): REG9010 - Cannot Manage MPAN Relationships for an Unmigrated MPAN.
    b. If a Forward Migration is underway and an IF-019 is sent, this will be rejected using REG9010 validation rule. An IF-020 will then be sent back with Response Code (DI-979): R; and Response Message (DI-980): REG9010 - Cannot Manage MPAN Relationships for an Unmigrated MPAN."

"13.2.8 IF-020

1. The structure of the IF-020 (Manage Meterpoint Relationships Response) will not change.
2. Data Item 'Response Message' (DI-980) related enumeration will include 1 additional value:

Enumeration Value: 'REG9010 - Cannot Manage MPAN Relationships for an Unmigrated MPAN'

Business Rules:

a. If a Reverse Migration is underway or MPAN is Legacy and an IF-019 is sent, this will be rejected using REG9010 validation rule. An IF-020 will be sent back with Response Code (DI979): R; and Response Message (DI-980): REG9010 - Cannot Manage MPAN Relationships for an Unmigrated MPAN.

b. If a Forward Migration is underway and an IF-019 is sent, this will be rejected using REG9010 validation rule. An IF-020 will then be sent back with Response Code (DI-979): R; and Response Message (DI-980): REG9010 - Cannot Manage MPAN Relationships for an Unmigrated MPAN."

"13.1.9 D0386

1. The structure of the D0386 will not change.
2. New validation rule will be applied to the D0386:
    a. "Reject if Forward Migration underway or MPAN is MHHS"
3. Data Item 'Related MPAN Response Code' (J2240) related enumeration will include 1 additional value:
    a. Enumeration Value: Y; Enumeration Description: Forward Migration Underway or MPAN is MHHS
4. Business Rules:
    a. If a Forward Migration is underway or MPAN is already MHHS and a D0386 is sent, this will be rejected. A D0386 will be sent back with enumeration value Y in the 'Related MPAN Response Code' data item to specify the rejection reason."

The design artefact DES138 - Interface Catalogue details all the new DIP Interfaces, data items, including validation rules. DES138 v5.8.7 includes the following on the IF019:

Receiving Party Business Validation Rules for Migration:

If either MPAN [DI-073] or any [DI-074] is subject to an active MCA Service Provider Appointment		REG9010 - Cannot Manage MPAN Relationships for an Unmigrated MPAN

DI-073	Principal MPAN	The Principal MPAN in a Related/Linked MPAN Relationship

DI-074	Subsidiary MPAN	The subsidiary MPAN in a Related/Linked MPAN Relationship

1.2 SOLUTION BACKGROUND – CODE DRAFTING

The MHHS code drafting in the new **Schedule XX - MHHS Migration**:

- Only addresses how Related Metering Points should be treated during a Migration (via a Switch or Change of Agent), or Reverse Migration, where a relationship is already established
- It does not address Related Metering Point relationship creation during the Transition Period overall

This approach is consistent with the rest of the Schedule, and section 9 of the Migration Design Document

The MHHS code drafting in **Schedule 28 – Related Metering Points**:

- Provides that SMRA should be notified for creating MHHS Metering Points and ERDA for non-MHHS Metering Points
- Provides the processes for creating relationships for **all** MHHS Metering Points or **all** non-MHHS Metering Points
- Is silent on whether a relationship can or cannot be created across MPANs that are and are not MHHS Metering Points

The MHHS data specification code drafting approved via R0209, does not include the additional enumeration for the data item **J2240 'Related MPAN Response Code' (DI51529)**. It was proposed at Change Issues Group that a scope item would be progressed alongside other Programme design changes under I0241. Those changes had not been considered as requiring an impact assessment.

All the documents referenced in subsections 1.1 and 1.2 are available in I0241 - Related Metering Points reference documents.zip.

1.3 INDUSTRY ENGAGEMENT

This potential scope item was introduced at the REC Change Issues Group on 06 February 2025 and discussed in detail at the same group on 06 March 2025. On 6 March, attendees:

- Validated the assumption that an MHHS Metering Point and a non-MHHS Metering Point cannot have a relationship created
- Confirmed support for progressing a clarification in Schedule 28 – Related Metering Points.

Prior to the meeting the MPRS service provider confirmed that the central system build, that ERDA and the SMRA will rely on, has been built to the requirements in the MHHS Design artefacts and that both the D0386 and DIP IF-019 would be rejected if the Primary and

Secondary Metering Points were not in the same migration state, whether they are subject to an active migration or not.

2 PROPOSED SOLUTION OVERVIEW

The proposed solution presented in this document is a code drafting only solution to add a clarification to Schedule 28 – Related Metering Points, by adding a new prerequisite for creation of a 'new Related Metering Point relationship' to paragraph 2.3, as follows:

2 Creation of a Related Metering Point Relationship

2.2 Where a Registered Supplier wants to create a new Related Metering Point relationship, it shall notify the Supplier Meter Registration Agent for MHHS Metering Points and Electricity Retail Data Agent for Non-MHHS Metering Points, identifying which Metering Point is to be the Primary Related Metering Point and which the Secondary Related Metering Point(s).

2.3 The prerequisites for this procedure are that:

(a) the Metering Points which are to become Related Metering Points each have the same RMP Status of Operational or Created;

(b) there is no Pending Registration for the Metering Points;

(c) the same Electricity Supplier (using the same Market Participant Role) holds an Active Registration for each Metering Point;

(d) each Metering Point has the same classification as either a Domestic Premises or a Non-Domestic Premises;

(e) the Registered Supplier has appointed the same Meter Operator Agent (MOA) for each Metering Point; ~~and~~

(f) the Metering Points are not members of a different existing Related Metering Point relationship; and~~.~~

(g) the Metering Points to be added to a relationship are either all MHHS Metering Points or all non-MHHS Metering Points.

The draft legal text provided above has been drafted against Schedule 28 - Related Metering Points MHHSv1.1, approved via R0209.

3 IMPACT ASSESSMENT

An impact assessment is being progressed for this I0241 scope item to provide industry with appropriate opportunity to consider the impact of, as well as the approach, to this code drafting. The impact assessment, primarily targeting Suppliers and Distribution Network operators (DNOs) acting in their role as ERDAs, will be issued for 10 Working Days in support of the criticality of confirming the drafting to be progressed through I0241.

Although Programme design updates should not require impact assessment, industry are encouraged to raise any concerns or comments on the additional enumeration in the J2240 via this Related Metering Points impact assessment.

4 TESTING REQUIREMENTS

The Code Manager does not expect there to be additional testing, over and above those already required for implementation of the MHHS design.

5 IMPLEMENTATION

If the impact assessment of this scope item validates the assumption that there are no additional impacts from this change, the approach will be to include this scope item in the Change Proposal to be taken forward with a target implementation date of MHHS Milestone 8, alongside other MHHS Code Drafting.

6 GLOSSARY

TERM	DEFINITION
Data Integration Platform (DIP)	means the data integration platform made available pursuant to the BSC.
DIP Manager	means BSCCo or such other entity as is responsible under the BSC for managing the Data Integration Platform.
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Electricity Retail Data Agent (ERDA)	means a provider of a DNO's Electricity Retail Data Service.
Market Message	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
Metering Point Registration System (MPRS)	means the System used or procured by each DNO in order to provide the Electricity Retail Data Service in accordance with the REC and / or the Supplier Meter Registration Service in accordance with the BSC.
MHHS Milestone M8 'Code changes delivered'	This is the milestone at which the consequential changes, required to the industry codes to enact the MHHS Design, will be implemented. The date will be determined and governed by the MHHS Programme.

Related Metering Points	means two or more related Metering Points as further described in the Related Metering Points Schedule.
Supplier Meter Registration Agent (SMRA)	means the provider of the Supplier Meter Registration Service (SMRS) provided pursuant to the BSC.