RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0241 - MHHS INCREMENTAL CHANGES FOR GO LIVE

On 13 March 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for the following elements of the I0241 - MHHS Incremental Changes for go live scope:

- **Related Metering Points during Migration**, which seeks to add a clarification to Schedule 28 – Related Metering Points that an MHHS Metering Point and a non-MHHS Metering cannot be related
- **EES API Consequential Change,** which seeks to make amendments to the EES API Technical Specification to align the document to the EES API which has been built to support the MHHS design

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	05/06/2025
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Harriet Truss

DATE IMPACT ASSESSMENT ISSUED	13/03/2025
RESPONSE DEADLINE	28/03/2025

Question 1:	Did a representative of your organisation attend the Change Issues Group on 06/03/2025?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator (DNO))	We normally have NGED attendees at the REC Change Issue Group, however unfortunately, due to annual leave, NGED were not in attendance on 06/03/2025.	Thank you for the response.

RELATED METERING POINTS DURING MIGRATION

Question 2:	Do you have any comments on the proposed solution and legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	No comments. We believe that the legal text aligns with the proposed solution.	Thank you for the response.

Question 3:	Are you aware of any constraints on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	Based on the fact that the updates to the REC MHHS Code Drafting are required for MHHS Go-Live at Milestone 8, this change must be delivered to coincide with the CR-055 date of 24/09/25 for M8.	Thank you for the response. The Code Manager would like to highlight that the MHHS M8 release is targeting 22/09/2024, as per the current MHHS Implementation Plan.

Question 4:	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 (DNO)	We don't believe that there will be any risks to our MHHS implementation, qualification or migration plans, providing the change is delivered on time.	Thank you for the response.

Question 5:	**COSTS: Would implementing the proposed solution incur any costs to your business, over and above those already anticipated for MHHS implementation? If so, please provide details breaking down design/build/test costs and ongoing costs.**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	We don't believe that there will be any additional costs over and above those already anticipated, however we are assessing these currently.	Thank you for the response.

Question 6:	**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 (DNO)	Yes, as clarifying that during the MHHS Transition Period, a relationship cannot be created between an MHHS Metering Point and a non-MHHS Metering Point therefore providing clearer documentation to enable better understanding of processes for all parties.	Thank you for the response.

Question 7:	**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 (DNO)	Yes. We believe that, as the proposed solution seeks to clarify that the Metering Points which are to be added to a relationship are either all MHHS Metering Points or all non-MHHS Metering Points, it is important to ensure that the clearest possible definition of the rules are provided within Schedule 28. Therefore as the code drafting change will incur minimal costs but provide better understanding of processes, this change should be made.	Thank you for the response.

Question 8:	**Do you have any other comments?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	No further comments	N/a

Question 9:	Do you have any comments on the proposed solution and legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	No comments. We believe that the legal text aligns with the proposed solution.	Thank you for the response.

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 (DNO)	None	Thank you for the response.

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 (DNO)	No, as these amendments reflect the EES system as it has been built for MHHS. As long as the EES API Technical Specification is updated with these amendments in line with MHHS Go-Live at Milestone 8, we would not expect there to be any risks associated with our MHHS implementation, qualification or migration plans.	Thank you for the response.

Question 12:	COSTS: Would implementing the proposed solution incur any costs to your business, over and above those already anticipated for MHHS implementation? If so, please provide details breaking down design/build/test costs and ongoing costs.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	Nil	Thank you for the response.

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 (DNO)	As a DNO, we do not utilise the EES.	Thank you for the response.

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 (DNO)	As a DNO, we do not utilise the EES, however we are supportive of this change.	Thank you for the response.

Question 15:	Do you have any other comments?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	No further comments	N/a