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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0244 C21 TO BE INTRODUCED INTO STIRG DOCUMENT

On 03 April 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0244 C21 to be introduced into STIRG Document.

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 April 2025
RESPONSIBLE COMMITTEE	Metering Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	03 April 2025
RESPONSE DEADLINE	29 April 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)	Please could you advise on the proposed implementation date of this change? It is important that we are as prepared as we can be.	Thank you for your comments. The Code Manager will review the responses to this impact assessment regarding lead times for implementation, and use that to inform their proposed implementation date. This will be confirmed in the next stage of the Change Report.
Northern Powergrid (Distribution Network Operator)	No.	Thank you for your confirmation.
SSE Energy Supply (Energy Supplier)	SSE agree, with the proposed solution	Thank you for your comments.
OVO (Energy Supplier)	This can only be a benefit and should result in less aborted visits, less DNO intervention and a much better customer journey.	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)	Yes we agree that the proposed solution fully addresses the problem statement.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE agree, the proposed solution addresses the problem statement	Thank you for your comments.
OVO (Energy Supplier)	Yes	Thank you for your comments.

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)	Not at this stage.	Thank you for your confirmation.
Northern Powergrid (Distribution Network Operator)	No.	Thank you for your confirmation.
SSE Energy Supply (Energy Supplier)	SSE do not believe that there are any alternative solutions	Thank you for your confirmation.
OVO (Energy Supplier)	n/a	n/a

Question 4:	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)	We don't believe this solution will affect, or have an impact on, the industry's move to the new MHHS arrangements. As confirmed by the Change Proposal, there will be no impact on the MHHS design and the MHHS Code Drafting.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	We do not believe this will impact MHHS arrangements.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE view this change as having no impact on the move to MHHS.	Thank you for your comments.
OVO (Energy Supplier)	n/a	n/a

Question 5:	Do you agree with the proposed updates to the Data Item?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree with the proposed updates to the Data Item.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes. But note comment in Q6	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE agree, with the proposed updates	Thank you for your comments.
OVO (Energy Supplier)	Yes	Thank you for your comments.

Question 6:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No comments.	Thank you for your confirmation.
Northern Powergrid (Distribution Network Operator)	Yes. For consistency with existing enumeration descriptions, the words “Connection” and “Arrangement” should not be capitalised. Probably an oversight when drafting the C21 guidance for the STIRG as that title is also incorrectly capitalised.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Not at this time	Thank you for your confirmation.
OVO (Energy Supplier)	No, have already reviewed with DCUSA parties	Thank you for your confirmation.

Question 7:	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)	Taking into consideration the system changes, subsequent testing and policy updates required by this change, we would require a minimum of 6 months to implement the proposed solution.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	2 days.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	As with any change to our system, adding a new Asset Condition Code Data Item will require 6 months lead time from change approval	Thank you for your comments.
OVO (Energy Supplier)	n/a	n/a

Question 8:	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)	As per our answer to question 4, we don't believe this solution will affect, or have an impact on, our transition to the new MHHS arrangements.	Thank you for your comments
Northern Powergrid (Distribution Network Operator)	No.	Thank you for your confirmation.
SSE Energy Supply (Energy Supplier)	This change will not provide a risk to our MHHS implementation provided the lead time is sufficient for planning system work.	Thank you for your comments
OVO (Energy Supplier)	n/a	n/a

Question 9:	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)	n/a	n/a
Northern Powergrid (Distribution Network Operator)	A	Thank you for your confirmation.
SSE Energy Supply (Energy Supplier)	B up to £9,999	Thank you for your confirmation.
OVO (Energy Supplier)	n/a	n/a

Question 10:	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)	As a DNO we should see less B07 reports and more meters installed across our network, which will be a benefit. Each visit to rectify makes no electrical changes to the customers property but causes inconvenience and multiple visits being needed to get the metering solution sorted.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes. It will allow the scenarios described to be more appropriately reported to DNO.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Although we do not have a large number of aborted installs where there is a non-standard PME connection arrangement, anything that maximises the safe installation of Smart/AMR meters is a benefit to SSE.	Thank you for your comments.
OVO (Energy Supplier)	Yes, it will result in less aborted visits, less DNO intervention and a much better customer journey. This will also greatly improve efficiency in the RTS removal programme.	Thank you for your comments.

Question 11:	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)	Yes. We would be very keen to see this change progressed, approved, and implemented as soon as possible for the reasons mentioned in our answer to question 10.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE agree, the change should be made	Thank you for your comments.
OVO (Energy Supplier)	Yes	Thank you for your comments.

Question 12:	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.	n/a
SSE Energy Supply (Energy Supplier)	No	n/a
OVO (Energy Supplier)	n/a	n/a