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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0284 UPDATES TO SCHEDULE 14 MEASUREMENT TRANSFORMERS COMMISSIONING TIMESCALES

On 06 February 2026 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0284 Updates to Schedule 14 Measurement Transformers Commissioning Timescales.

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
DATE ISSUED	09 March 2026
RESPONSIBLE COMMITTEE	Metering Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	06 February 2026
RESPONSE DEADLINE	06 March 2026

Question 1:	Did you attend Change Issues Group on 05 February 2026?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	Yes, SSE was represented at the February Change Issues Group.	Thank you for your confirmation.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your confirmation.
IMSERV (Metering Equipment Manager)	Yes.	Thank you for your confirmation.
Scottish Power Energy Networks (Distribution Network Operator)	No	Thank you for your confirmation.
National Grid Energy Distribution (Distribution Network Operator)	No.	Thank you for your confirmation.
British Gas (Energy Supplier)	Yes	Thank you for your confirmation.
ScottishPower Energy Retail (Energy Supplier)	Yes, representatives from our organisation attended the CHIG.	Thank you for your confirmation.

Question 2:	Do you have any comments on the proposed solutions? Do you have a preference between solution option 1 or 2, or a third solution you'd like to propose?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE feels option 2, of 65 WDs, is the preferred option, as this provides a bigger window to deal with any issues before the settlement cut off.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Preference would be option 1 as the proposed changes are minimal so has the least impact on the existing timescales. The proposed changes in option 2 are significant.	Thank you for your comments.
IMSERV (Metering Equipment Manager)	Option 1 is our preference.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	We are supportive of the proposed solution. Our preference would be for Option 2 – We believe that this allows a speedy timescale for Commissioning to be completed and for any remedial issues not identified at the time of Commissioning to be resolved prior to the Settlement RF cut off.	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	We would be reluctant to agree to a change in the current timescales, therefore at this stage our preference of the two proposed solutions would be option 1 as this presents minimal amendment. That said, we are still assessing whether the timescale amendments outlined in option 1 are viable. We would vote against option 2.	Thank you for your comments.

British Gas (Energy Supplier)	We consider Option 2 to be our preferred choice.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	We have reviewed both options and agree with their overall intent, particularly the need to shorten the commissioning period due to the proposed changes in the RF period. However, in practice, the commissioning process is affected by a wide range of factors that delay completion of the full end to end process. Many of these factors can be beyond the control of the MOAs including load availability, energisation status and site access.	Thank you for your comments. The Code Manager does not disagree with this assessment but believes that the associated SLAs should be reflective of best practice – in this case, being before the RF run.

Question 3:	Are there any figures you would like to provide to support your position on this Issue? For example, the % of commissions currently completed in less than 80WDs, or the % of commissions that exceed the 80WDs.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	We do not have the data to back up our preference, but we feel 13 weeks to be a reasonable time period to commission measurement transformers, whilst allowing data collectors and suppliers sufficient time to correct any data.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	N/A. This is for suppliers to comment on.	n/a
IMSERV (Metering Equipment Manager)	As MEM, most of our CT meters are commissioned successfully at the point of install, this will always remain our objective.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	We do not have tracking on processes outside of our remit; however, we note that there can be a significant number of sites where the DNO commissioning has taken place, however there are delays in the MOA being appointed to enable the D0383 flow to be sent.	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	Not at this stage, although we are looking to obtain some internal reporting to assist with our assessment of whether solution option 1 would be viable. We would welcome any statistics that shows the percentage of commissions that exceed 80-85 WDs to help us to understand the extent of the problem.	Thank you for your comments.

British Gas (Energy Supplier)	n/a	n/a
ScottishPower Energy Retail (Energy Supplier)	n/a	n/a

Question 4:	Do you agree the proposed solutions addresses the problem statement, confirming if you believe either addresses the problem statement better than the other? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	Both of the proposed solutions address the problem statement, but option 2 provides a more solid answer, and less risk to settlements.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes. I seem to recall the original timescales in schedule 14 were selected to align with the Settlement Run in the BSC. If this is still relevant then the option chosen should be as close to the original timescales as possible, therefore, solution 1.	Thank you for your comments.
IMSERV (Metering Equipment Manager)	Commissioning 100% of meters within timescales will always be very challenging, but we do agree that timescales are required and those timescales should be set within RF.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we believe that the solution addresses the problem.	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	In order to determine whether reducing the current timescales to fit in with the post-M16 settlement timetable is a required change, we would welcome any statistics that shows the percentage of commissions that exceed the current 80-85 WD timescale, along with any other related data/figures to support this.	Thank you for your comments. The Code Manager has asked for this from industry but has not received any data it is able to share (e.g. non-confidential data).

British Gas (Energy Supplier)	n/a	n/a
ScottishPower Energy Retail (Energy Supplier)	No, we do not believe the proposed solutions address the problem statement. Our recommendation would therefore be to retain the current process. However, if this change is progressed, our preference would be Option 1, solely because it provides a longer timeframe in which to complete the process.	Thank you for your comments.

Question 5:	Do you think we have identified and considered all processes and scenarios that may be impacted through the implementation of the proposed change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	We are not aware of any other scenarios at this stage.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	I refer to Q4. Has the Settlement Run been considered and is it still in existence and relevant?	Thank you for your comments. 85 Working Days is roughly aligned with the current R2 Settlement Run. From M16, this 85 Working Days will be roughly aligned to the RF Settlement Run. This is why it has been raised as an Issue to shorten the timescales – any delay could lead to incorrect Settlement data being crystallised at the new, shorter RF run. Post M16 there will only be II, SF, R1 and RF runs. The Code Manager does not think it appropriate to align to the new R1 run, as this is roughly 30 Working Days and does not provide enough time for this process to take place.
IMSERV (Metering Equipment Manager)	N/A	n/a

Scottish Power Energy Networks (Distribution Network Operator)	We have not identified any additional areas for consideration.	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	We believe so but we are investigating any potential implications at our end further, just to be certain.	Thank you for your comments. Please let the Code Manager know as soon as you are able if you identify anything.
British Gas (Energy Supplier)	n/a	n/a
ScottishPower Energy Retail (Energy Supplier)	n/a	n/a

Question 6:	Do you believe the solution appropriately accounts for the industry's move to the new MHHS arrangements whilst the industry manages both MHHS and non-MHHS Metering Points?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	By definition, the solutions proposed are taking into account MHHS.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.
IMSERV (Metering Equipment Manager)	Yes, it's a logical change	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we believe that this solution allows for the investigation and resolution of any queries/issues prior to the RF Run.	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	Yes.	Thank you for your comments.
British Gas (Energy Supplier)	n/a	n/a
ScottishPower Energy Retail (Energy Supplier)	n/a	n/a

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**
SSE Energy Supply (Energy Supplier)	This change will require only a month to update the necessary processes.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	3-months	Thank you for your comments.
IMSERV (Metering Equipment Manager)	Six months would be preferable as changes to internal reporting and procedures will be required.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	We would require a 6-month lead time for the implementation of this, to allow for system changes and staff training.	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	There would be quite a few changes needed to our internal software/on-site apps, along with updates to policies, LWIs and field operative training. Based on current workloads, we estimate that this could take a minimum of 6-9 months.	Thank you for your comments.
British Gas (Energy Supplier)	n/a	n/a
ScottishPower Energy Retail (Energy Supplier)	We cannot adequately comment on this at this time.	Thank you for your comments.

Question 8:	Are you aware of any constraints on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	As this change impacts MHHS settlements, it should be in place by M16, which is currently 2nd July 2027.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No.	Thank you for your comments.
IMSERV (Metering Equipment Manager)	N/A	n/a
Scottish Power Energy Networks (Distribution Network Operator)	No.	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	No, other than what we have mentioned above in terms of our own constraints.	Thank you for your comments.
British Gas (Energy Supplier)	n/a	n/a
ScottishPower Energy Retail (Energy Supplier)	n/a	n/a

Question 9:	Do you foresee any risks to your qualification or migration plans to be delivered as part of MHHS implementation caused by the delivery of this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No.	Thank you for your comments.
IMSERV (Metering Equipment Manager)	None	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	N/A. As a DNO we have already qualified.	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	No.	Thank you for your comments.
British Gas (Energy Supplier)	n/a	n/a
ScottishPower Energy Retail (Energy Supplier)	n/a	n/a

Question 10:	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**
SSE Energy Supply (Energy Supplier)	B) Up to £9,999	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	A) Nil	Thank you for your comments.
IMSERV (Metering Equipment Manager)	n/a	n/a
Scottish Power Energy Networks (Distribution Network Operator)	n/a	n/a
National Grid Energy Distribution (Distribution Network Operator)	We are unable to provide a figure at this stage as we would need to discuss further with our IT&D Team to establish the extent of the software updates needed. We would estimate either B) or C) depending on the outcome of these discussions.	Thank you for your comments.
British Gas (Energy Supplier)	n/a	n/a

ScottishPower Energy Retail (Energy Supplier)	We cannot provide a detailed breakdown at this point.	Thank you for your comments.

Question 11:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	It will improve the chances of more accurate settlement data post MHHS.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	N/A	n/a
IMSERV (Metering Equipment Manager)	No benefits specific to MEM, but still generally beneficial to the Settlement process	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	We have been unable to identify any tangible benefit in terms of our processes.	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	No.	Thank you for your comments.
British Gas (Energy Supplier)	n/a	n/a
ScottishPower Energy Retail (Energy Supplier)	n/a	n/a

Question 12:	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**
SSE Energy Supply (Energy Supplier)	Yes.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.
IMSERV (Metering Equipment Manager)	Yes, this on the basis that its logical for CT/VT commissioning to be completed before RF	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we are supportive of this change, as it would ensure better alignment with the MHHS change to the RF run, resulting in a greater degree of Settlement Accuracy.	Thank you for your comments.
National Grid Energy Distribution (Distribution Network Operator)	At this stage, no. There would potentially be considerable cost to us and no benefit. We would need further evidence on the extent of this problem as stated above.	Thank you for your comments.
British Gas (Energy Supplier)	n/a	n/a
ScottishPower Energy Retail (Energy Supplier)	n/a	n/a

Question 13:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	If option 2 is not feasible, we strongly support the implementation of option 1 as the alternative.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No.	n/a
IMSERV (Metering Equipment Manager)	None	n/a
Scottish Power Energy Networks (Distribution Network Operator)	No Further Comments.	n/a
National Grid Energy Distribution (Distribution Network Operator)	No further comments.	n/a
British Gas (Energy Supplier)	n/a	n/a
ScottishPower Energy Retail (Energy Supplier)	n/a	n/a