RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0306 REC CHANGE TO ALIGN WITH DCP467 ASSET CONDITION REPORTING

On 06 February 2026 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0306 REC Change to Align with DCP467 Asset Condition Reporting.

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	Metering Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	06 February 2026
RESPONSE DEADLINE	27 February 2026

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	NPg does not currently provide a portal for meter operators to report A and B code service termination issues. However, we support this proposal in principle and may reconsider if the change is implemented and it meets the objectives it aims to achieve.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Whilst we agree that the STIRG and market message should be updated to reflect DCP467, we have considerable concerns around the priority use of an online portal rather than a telephone to report what can be emergency faults. We are not against the option to use a DNO portal, but we feel this should not be mandated over the use of a phone.	Thank you for your comments. The Code Manager will ensure this is fed back to DCUSA as the lead code.
National Grid Electricity Distribution (Distribution Network Operator)	In regards to the REC solution which looks to make changes to the STIR document and D0135/D0126 flow notes, we have no comments at this stage. In regards to the DCUSA solution, please see our answer to Q2 below.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	We welcome the proposed solution. However, our understanding is that this remains at the Working Group stage under the DCUSA and has not yet been subject to a formal information request to clarify the modalities for how the online reporting tool, where provided by the DNO would operate. We also note that there was some pushback during the DCUSA Working Group meeting where this proposal was discussed.	Thank you for your comments. The Code Manager will ensure this is fed back to DCUSA as the lead code.

	While we recognise the potential benefits the solution could deliver, it is important that the practical and operational implications are fully assessed by industry before any consequential updates are made to industry guidance. Having two separate industry processes for the DNOs using the online tool and for the ones who are not and the fact that this online tool is not mandated for all the DNOs could create significant confusion for industry.	The REC impact assessment was meant to run alongside the DCUSA RFI. Unfortunately, the DCUSA RFI has been delayed.

Question 2:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We agree that updating the wording in the STIRG and market message addresses the problem statement.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	In theory yes, the proposed solution appears to address the problem statement. However, I understand that following the first DCUSA DCP467 Working Group meeting, it was agreed that a RFI would be published to gather further information from DNOs, MOPs and Suppliers with a view to providing additional clarity on the proposal ahead of the consultation stage. Therefore, at this early stage of the DCP467 change process, we would reserve judgement on whether the problem statement is appropriately met by the proposed solution until we learn whether the outcome of the initial DCUSA RFI adds any further clarity to the original proposal.	Thank you for your comments. This was agreed and the REC impact assessment was meant to run alongside the DCUSA RFI. Unfortunately, the DCUSA RFI has been delayed. REC and DCUSA will continue to work closely together, and once DCUSA have published their legal text for consultation this will be reviewed to see if any tweaks are required to the REC legal text.
ScottishPower Energy Retail (Energy Supplier)	Please see our response to Q1.	n/a

Question 3:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	No	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	If a portal is to be used to submit category A reports, we would prefer there to be an industry standard portal to remove the need for operatives to choose the correct portal on site. This would ensure that operatives use the correct portal each time.	Thank you for your comments. The Code Manager will ensure this is fed back to DCUSA as the lead code.
National Grid Electricity Distribution (Distribution Network Operator)	At this stage we are not aware of any alternative solutions that would better meet the needs of the problem statement, as the information that DNOs can obtain via the online reporting tool may be more extensive than that which can be provided over the phone or via data flow (photographs being the main example). That said, in a Category A situation, DNOs may also benefit from a phone call as a direct conversation with the MOP when on site may allow them to ask specific questions relating to that particular situation if needed, which wouldn't necessarily be possible if the report came in via the online reporting tool. Therefore, again referring to our answer to Q2 above, we would welcome any industry feedback that comes from the RFI which may enable a more substantiated response.	Thank you for your comments. The REC has fed back to DCUSA they believe the DCUSA solution should specify that any online portal cannot mandate information that is not already mandatory under the D0135 Market Message, so things such as photographs should be optional to provide. If this is otherwise the case, the REC believes a larger impact assessment/consultation is required.

ScottishPower Energy Retail (Energy Supplier)	**Option 1: Use of two separate industry processes to report CAT A and B issues** Mandate use of the online tool for all DCUSA parties except DNOs - have two separate industry processes, one for the DNOs using the online tool and one for those who are not using the online tool. **Option 2 – Mandate use of the online tool for everyone for CAT A and B issues and define new industry process.** Mandate the use of online tool for all DNOs, iDNOs, BNOs, MEMs, SIPs and all DCUSA parties - new industry process to be defined and agreed. Use of online tool as a primary method, use of telephone and data flow in case of issues reporting through the online portal. **Option 3 – Mandate the use of online tool for everyone for CAT A only, CAT B to be reported via data flow** Mandate the use of the online tool for all DNOs, iDNOs and BNOs - Use of the online tool mandatory for all DCUSA parties for CAT A issues only. CAT B issues to be reported via data flows.	Thank you for your comments. The Code Manager will ensure this is fed back to DCUSA as the lead code.

Question 4:	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**
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We have no other scenarios where an update would be required.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes. Based on the current change proposal, we agree that the STIR document and D0135/D0126 flows would be all that is impacted from a REC point of view.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	No comment.	n/a

Question 5:	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**
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	The solution in this change proposal is not impacted by MHHS.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	N/A	n/a
ScottishPower Energy Retail (Energy Supplier)	No comment.	n/a

Question 6:	Do you have any comments on the proposed legal text, including the proposed changes to the Market Messages?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	No	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Whilst we agree the text in both the STIRG and the Market Message reflect the Change Proposal, as mentioned above, we would like the change to reflect agents having a choice of communication method for category A faults.	Thank you for your comments. The Code Manager will ensure this is fed back to DCUSA as the lead code.
National Grid Electricity Distribution (Distribution Network Operator)	If a DNO has an online reporting tool but the MOP is unable to use it due to a technical issue or lack of signal, would the MOP then be able to revert to using the original methods of contact (telephone for CAT A/data flow for CAT B)? As there will be a mandatory obligation on the MOP to use the online tool (if available), would the circumstances in which they can deviate from this need to be explicitly defined?	Thank you for your comments. The REC will pass these questions onto DCUSA to consider as part of their solution, and make any adjustments required to the REC solution to ensure it sits with the DCUSA solution.
ScottishPower Energy Retail (Energy Supplier)	Please see our concerns in Question 1 and 3.	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**
Northern Powergrid (Distribution Network Operator)	N/A – no changes required	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	The change time would be dependent on our agents having access to all the available portals and training time on their usage.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	From a REC perspective, updating the STIR guidance document and D0135/D0126 flow notes, and relaying the information to appropriate business areas would be a straightforward process so approximately 2-3 weeks' notice should be sufficient.	Thank you for your comments. The REC and DCUSA solutions will need to be implemented as part of the same release, so the solution should be considered a whole across both codes for implementation timeline purposes.
ScottishPower Energy Retail (Energy Supplier)	We would require at least six months to implement this change within our organisation.	Thank you for your comments.

Question 8:	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**
Northern Powergrid (Distribution Network Operator)	No	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	No.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	We do not at this stage, identify any risks to our qualification or migrations plans.	Thank you for your comments.

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**
Northern Powergrid (Distribution Network Operator)	Nil	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	This would be a commercial arrangement with our agents which we are unable to determine at this stage.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	From a REC perspective, updating the STIR guidance document and D0135/D0126 flow notes, and relaying the information to appropriate business areas would be a straightforward process therefore costs would be minimal. The process of doing this would mean small labour costs would be involved so our answer would have to be B), however these costs would definitely be on the much lower end of the bracket.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	We cannot appropriately determine costs at this stage.	Thank you for your comments.

Question 10:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	Not in the short term but if this change proves successful NPg may consider providing a portal in the future.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	We view the changing of current fault reporting (which works) as a potential Health and Safety risk.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We don't currently offer an online reporting tool so the proposed solution would not change any of our current processes at this stage. However, it is something that we are hoping to implement in the future so the obligated usage of this tool would be beneficial in ensuring that as a DNO, we receive the information we need in Category A & B situations, including photographs.	Thank you for your comments. Please see the Code Manager response to Q3, that we have fed back to DCUSA that we do not believe photographs should be able to be mandatory as part of any portal solution.
ScottishPower Energy Retail (Energy Supplier)	No, we do not identify any benefits to us.	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**
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No, not in its present form.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	At this stage we would be inclined to agree, however referring back to our answer to Q2, we would be interested in how DCUSA DCP467 progresses before committing entirely.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	No, we do not agree that this change should progress.	Thank you for your comments.

Question 12:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	No	n/a
SSE Energy Supply (Energy Supplier)	No.	n/a
National Grid Electricity Distribution (Distribution Network Operator)	No.	n/a
ScottishPower Energy Retail (Energy Supplier)	n/a	n/a