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CONSOLIDATED CONSULTATION RESPONSES

R0083 – CHANGES TO SUPPLY NUMBER FORMAT FOR MHHS

R0083A – CHANGES TO SUPPLY NUMBER FORMAT FOR MHHS (ALTERNATIVE)

On 06 April 2023 the Code Manager issued a Party impact assessment to industry to seek feedback on the Solution Options Paper for R0083 and R0083A.

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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RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Harriet Truss

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Question 1:	Which R0083 solution presented in the Solutions Options Paper, option 1 or 2, is your preferred solution? Please provide your rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	option 3 (R0083A) we feel that statement etc could be out of date before it is used.	-
BUUK (Independent Distribution Network Operator (DNO))	Option 2 of 3 is our preferred solution for the reasons outlined in the impact assessment.	-
EDF Energy (Energy Supplier)	EDF's preferred solution is Option 1; we would like to see the top line retained. Option 1 requires minimal changes to our system as it would retain the existing format for the top line. This option retains key data we use when quoting and discussing contracts, specifically with our business customers. We are not in favour of option 2. We do not need the DPI when quoting sites; while there could be some value in having the segment, this use would be outweighed by the costs of amending our systems to display extra fields across the top line	The detail provided in the response is useful and the points have been noted.
National Grid Electricity Distribution (DNO)	As a DNO we only use the Supply Number when providing shut down information to a customer. Therefore as long as all required data items	Neither R0083 nor R0083A look to change the availability of data items within central systems, for example MPRS or EES. The Change Proposals only look to amend which

	contained within the Supply number were held in MPRS we would be supportive of Option 1 as this is the least change. We are not supportive of Option 2 as this appears overly complex for a customer. We would suggest that if this level of detail is required then the Suppliers provide the information in a separate table on a customer bill.	data items are displayed within the Supply Number. Any change to data item availability is driven by the MHHS programme.
Scottish Power (Energy Supplier)	Out of the 3 options, number 3 is our preferred option however we don't believe it is the best option for customers.	-
Scottish Power Energy Networks (DNO)	Our preference is for option 2, we believe that is provided the maximum information available and allows the Customer to be provided with all relevant information, we believe that this will provide them with the details to query any incorrect information easily with any relevant party where appropriate.	-
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Our preferred solution is Option 1. Our customer base utilises the DUoS tariff ID therefore this needs to be retained, we do not believe there is any benefit in retaining the Profile Class ID however, we appreciate the rationale for this to remain. The Standard Settlement Configuration (SSC) would also be beneficial to add to the top line.	-

Question 2:	Do you believe there is a solution not listed within this document that the Code Manager should consider? Please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	No	-
BUUK (Independent DNO)	No.	-
EDF Energy (Energy Supplier)	No	-
National Grid Electricity Distribution (DNO)	No response provided	-
Scottish Power (Energy Supplier)	Obligate suppliers to provide the MPAN but don't obligate how it is presented i.e., boxes	The supply licence obligations set out that the Supply Number format is prescribed in the REC. However, the objective of R0083 and R0083A is to address the impacts of the MHHS design to the top line of the Supply Number. The presentation of the MPAN in the bottom line of the Supply Number, currently split into three sections, has not been within the scope of the solution development. The Code Manager notes the suggestion that the MPAN may no longer need to be split into

		three parts, but considers this to be outside the scope and intent of R0083 and R0083A.
Scottish Power Energy Networks (DNO)	We have not identified any other solutions.	-
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No, in our first response we proposed the use of the Market Segment Code within the top line but based on the options listed, we prefer Option 1 which does not include this.	The Market Segment Indicator was considered by the Code Manager during solution development for Option 1. The SSC was determined to be more closely aligned to the existing Supply Number Format and therefore met the Option 1 requirement to minimise the degree of change whilst retaining the top line.

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SOLUTION OPTION 1 (R0083) – MAINTAIN STRUCTURE, RETAIN PC, REPLACE REDUNDANT DATA ITEMS

Question 3:	Do you agree this solution resolves the problem statement? Please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	No response given	-
BUUK (Independent DNO)	No response given	-
EDF Energy (Energy Supplier)	Yes. This option will retain the top line and display useful information for use by Suppliers, Third Party Brokers and Customers	-
National Grid Electricity Distribution (DNO)	Yes we believe that Option 1 resolves the problem statement and provides a good solution for all parties and the consumer.	-
Scottish Power (Energy Supplier)	We do not agree with the problem statement because it is mandating that the supply number remains. We believe a better option is to mandate the publication of the MPAN only similar to that of gas.	The provision of the Supply Number is determined by a licence obligation. It is not within the scope of R0083 or R0083A to amend the Supply Licence obligation.
Scottish Power Energy Networks (DNO)	We do believe that this resolves the problem statement, however this does not give the same level of information as option 2.	-

SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Yes, as this will provide suppliers with a clear understanding of the approach to population of the supply metering points for transition to the MHHS Programme	-

Question 4:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	No response given	-
BUUK (Independent DNO)	No response given	-
EDF Energy (Energy Supplier)	No	-
National Grid Electricity Distribution (DNO)	No response provided	-
Scottish Power (Energy Supplier)	No as we do not agree with the change.	-
Scottish Power Energy Networks	No comments	-

(DNO)		
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	We do not have any significant concerns with regards to the legal text however, we believe Clause 1.f. should specify the number of zero's to be displayed.	The Code Manager notes this response and will consider further clarification in the legal text for the proposed solution.

Question 5:	Will your organisation incur any costs to implement the proposed solution? If yes, please provide an explanation of these as well as the rough order of magnitude.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	No response given	-
BUUK (Independent DNO)	No	The Code Manager thanks the responder for the information on cost impact.
Scottish Power (Energy Supplier)	Yes, but we have not had access to resources to confirm expected cost and cannot make an assumption as this has not been amended in over 20 years. We do not expect on-going operational costs.	The Code Manager notes the confirmation that there will be a cost impact for delivering changes.

Scottish Power Energy Networks (DNO)	As a DNO we do not expect a high level of cost for this change	The Code Manager thanks the responder for the information on cost impact.

Question 6:	How long will it take your organisation to implement the proposed solution? (What lead time will be required?)	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	No response given	-
BUUK (Independent DNO)	No response given	-
EDF Energy (Energy Supplier)	We would usually require a minimum of 3 months' notice for any system impacting change. The exact lead time depends on when R0083 is approved and where it falls in the month, whether we have any other changes which need deploying ahead of this change and whether we are in any code freeze periods.	The detail provided is useful and the Code Manager notes this response. The expected date of the REC Change Panel's recommendation can be found in the Change Proposal Plan on the R0083 Change Proposal page on the REC Portal. An exact date for the Authority decision cannot be provided however.

National Grid Electricity Distribution (DNO)	A lead time of 6 months would be required to implement any system changes.	-
Scottish Power (Energy Supplier)	We do not agree with the change, but if we had to implement, changes to bills are always complicated and we would expect a 9 month build and test period.	-
Scottish Power Energy Networks (DNO)	N/A	-
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	We would require at least 12 months lead time from agreement to required implementation.	-

Question 7:	Do you agree that this solution should be implemented alongside MHHS Code Changes at MHHS Milestone 8 and be effective from the implementation date? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	No response given	-
BUUK (Independent DNO)	No response given	-
EDF Energy (Energy Supplier)	We would be happy with these changes being made at M8.	-

National Grid Electricity Distribution (DNO)	We are supportive of this Option 1 compared to Option 2. We believe that this will incur least change compared to Option 2 and therefore least risk to the implementation of the change in line with the MHHS Programme milestones.	-
Scottish Power (Energy Supplier)	We have no preference.	-
Scottish Power Energy Networks (DNO)	We believe that this could be implemented alongside code changes, as the information is already available	-
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	It is not clear from the proposal what the implementation date will be and therefore we are unable to provide a rationale for this. We agree that implementation should be completed alongside the M8 Milestone however it is not clear whether this would also mean that should the MHHS programme be rebaselined, and the milestones amended, would this change also require amendment.	Specific dates were not included in the impact assessment materials as the MHHS Programme were imminently going out to consultation with a final set of dates for the programme replan. These dates are now approved by the Programme Steering Group and are awaiting Ofgem approval. Milestone M8 'Code changes delivered' is planned for 7 March 2025. By tying implementation of this Change Proposal to M8, this Change Proposal will not need to be amended if the M8 date is re-baselined, however the actual date of this Change Proposal will be changed to be the same as the new baseline. The proposed solution and change report will include this information for consultation.

Question 8:	Do you have any other comments on this proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	No response given	-
BUUK (Independent DNO)	No response given	-
EDF Energy (Energy Supplier)	No	-
National Grid Electricity Distribution (DNO)	No response provided	-
Scottish Power (Energy Supplier)	We believe there is no real customer benefit having a supply number anymore as the information is readily available on the API within EES. If a customer needed to provide their MPAN, none of the options allow them to copy and paste easily as they currently can for gas.	The detail provided is useful and the Code Manager notes this response.
Scottish Power Energy Networks (DNO)	No other comments	-
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No.	-

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SOLUTION OPTION 2 (R0083) – AMEND STRUCTURE, REPLACE REDUNDANT DATA ITEMS, ADD NEW DATA ITEMS

Question 9:	Do you agree this solution resolves the problem statement? Please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	No response given	-
BUUK (Independent DNO)	Yes	-
EDF Energy (Energy Supplier)	Option 2 does resolve the problem statement; however it is an option which is not needed in our opinion. Adding extra fields to the top line could cause customer and 3rd party broker confusion. This option carries a higher cost than option 1 and would take longer to implement.	The detail provided is useful and the Code Manager notes this response.
National Grid Electricity Distribution (DNO)	Although Option 2 also resolves the problem statement, we are not supportive of this option as we believe that it is overly complex for the consumer and there will be added complexity during transition and potentially reverse migration. We believe that those additional data items can be identified through other sources. Should the Supplier wish to provide this level of detail for a consumer these could be provided in a separate table on the consumer bill.	Code Manager comments provided in Question 1 above

Scottish Power (Energy Supplier)	Please see comments above.	Code Manager comments provided above in Question 1 and Option 1, Questions 3-8.
Scottish Power Energy Networks (DNO)	We believe that this gives the customer more information on their supply type. The new data fields are reflective of the new MHHS world.	-
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Yes however we do believe this option is more complex than Option 1.	-

Question 10:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	No response given	-
BUUK (Independent DNO)	No	-
EDF Energy (Energy Supplier)	No	-

National Grid Electricity Distribution (DNO)	No response provided	-
Scottish Power (Energy Supplier)	Please see comments above.	Code Manager comments provided above in Question 1 and Option 1, Questions 3-8.
Scottish Power Energy Networks (DNO)	Nothing identified	-
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	We do not have any significant concerns with regards to the legal text however, we believe Clause 1.f. should specify the number of zero's to be displayed.	Code Manager response provided in Question 4 above

Question 11:	Will your organisation incur any costs to implement the proposed solution? If yes, please provide an explanation of these as well as the rough order of magnitude.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	No response given	-
BUUK (Independent DNO)	No	-

Scottish Power (Energy Supplier)	Please see comments above.	Code Manager response provided in Question 5 above
Scottish Power Energy Networks (DNO)	As a DNO we do not expect a high level of cost for this change	The Code Manager thanks the responder for confirmation of the areas of cost impact

Question 12:	How long will it take your organisation to implement the proposed solution? (What lead time will be required?)	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	No response provided	-
BUUK (Independent DNO)	N/A	-
EDF Energy (Energy Supplier)	We would usually require a minimum of 3 months' notice for any system impacting change. The exact lead time depends on when R0083 is approved and where it falls in the month, whether we have any other changes which need deploying ahead of this change and whether we are in any code freeze periods. We also need to work with our 3rd party providers and agree a change deployment date we can both meet.	The detail provided is useful and the Code Manager notes this response. The expected date of the REC Change Panel's recommendation, 01 August 2023, can be found in the Change Proposal Plan on the R0083 Change Proposal page on the

		REC Portal. An exact date for the Authority decision cannot be provided however.
National Grid Electricity Distribution (DNO)	We will require a minimum of 6 months to implement	-
Scottish Power (Energy Supplier)	Please see comments above.	-
Scottish Power Energy Networks (DNO)	We have limited requirement for change in this area	-
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	We would require at least 12 months lead time from agreement to required implementation.	-

Question 13:	Do you agree that this solution should be implemented alongside MHHS Code Changes at MHHS Milestone 8 and be effective from the implementation date? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	No response given	-

BUUK (Independent DNO)	No response given	-
EDF Energy (Energy Supplier)	We would be happy with these changes being made at M8.	-
National Grid Electricity Distribution (DNO)	No response provided	-
Scottish Power (Energy Supplier)	Please see comments above.	-
Scottish Power Energy Networks (DNO)	We believe that this should be implemented during MHHS, however believe that this may be best at the end of transition when the new information is available	The Code Manager notes the response.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	It is not clear from the proposal what the implementation date will be and therefore we are unable to provide a rationale for this. We agree that implementation should be completed alongside the M8 Milestone however it is not clear whether this would also mean that should the MHHS programme be rebaselined, and the milestones amended, would this change also require amendment.	Code Manager comment provided in Question 7 above.

Question 14:	Do you have any other comments on this proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	No response given	-
BUUK (Independent DNO)	No	-
EDF Energy (Energy Supplier)	No	-
National Grid Electricity Distribution (DNO)	No response provided	-
Scottish Power (Energy Supplier)	Please see comments above.	The Code Manager has noted the response in Question 8 above.
Scottish Power Energy Networks (DNO)	None	-
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No.	-

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SOLUTION OPTION 3 (R0083A) – REMOVE TOP LINE

Question 15:	Do you agree this solution resolves the problem statement? Please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	We do, we believe as above that this implemented at any time once it has been approved in readiness for MHHS.	This is helpful and the Code Manager notes the response.
BUUK (Independent DNO)	No response given	-
EDF Energy (Energy Supplier)	No, removing the top line would potentially cause issues with switching.	The Code Manager notes the concern raised.
National Grid Electricity Distribution (DNO)	We are supportive of the solution to remove the top line entirely as this will be a far simpler change to achieve in line with MHHS programme milestones. This will also remove any complexity during transition and potential reverse migration. In addition, should the Supplier wish to provide a greater level of detail for a consumer these could be provided in a separate table on the consumer bill	The Code Manager notes the support for Option 3. Code Manager comment on provision of additional information on the customer bill is provided in Question 1 above
Scottish Power (Energy Supplier)	Please see comments above.	Code Manager comment provided in Question 3 above.
Scottish Power Energy Networks (DNO)	We do not see the rationale for the removal of the top line, although some parties have advised that they do not use it, we believe that it is valuable information that is provided to the Customer, we believe that	The Code Manager notes the concern raised.

	particularly business customers may use this to assess their billing costs.	
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No, the problem statement specifies that the energy supplier is obligated to provide the customer with the information contained within the top line, therefore removing the top line will require additional changes to the licence.	The licence obligation specifies that the Supply Number should be provided but that the content and format is defined within the REC.

Question 16:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	This is also in line with OFGEM view that are suppliers should use EES before initiating switch so they will see all meter details there and accurate information	The Code Manager acknowledges the response.
BUUK (Independent DNO)	No response given	-
EDF Energy (Energy Supplier)	No	-
National Grid Electricity Distribution (DNO)	No response provided	-
Scottish Power (Energy Supplier)	Please see comments above.	-

Scottish Power Energy Networks (DNO)	none	-
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No.	-

Question 17:	Will your organisation incur any costs to implement the proposed solution? If yes, please provide an explanation of these as well as the rough order of magnitude.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	No response given.	-
BUUK (Independent DNO)	No	-
Scottish Power (Energy Supplier)	Please see comments above.	Code Manager response provided in Question 5 above.
Scottish Power Energy Networks	As a DNO we do not expect a high level of cost for this change	The Code Manager thanks the responder

(DNO)		for the information on cost impact.

Question 18:	How long will it take your organisation to implement the proposed solution? (What lead time will be required?)	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	We would ask for the normal 6-month lead time or linked to one of the MHHS miles so that it forms part of a wider release	The Code Manager supports alignment with MHHS milestones.
BUUK (Independent DNO)	No response given	-
EDF Energy (Energy Supplier)	We would usually require a minimum of 3 months' notice for any system impacting change. The exact lead time depends on when R0083 is approved and where it falls in the month, whether we have any other changes which need deploying ahead of this change and whether we are in any code freeze periods. We also need to work with our 3rd party providers and agree a change deployment date we can both meet.	The detail provided is useful and the Code Manager notes this response. The expected date of the REC Change Panel's recommendation can be found in the Change Proposal Plan on the R0083 Change Proposal page on the REC Portal. An exact date for the Authority decision cannot be provided however.
National Grid Electricity Distribution (DNO)	As this option will require minimum change there will be minimal lead time required to implement this solution.	-

Scottish Power (Energy Supplier)	Please see comments above.	-
Scottish Power Energy Networks (DNO)	We have limited requirement for change in this area	-
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	We would require at least 12 months lead time from agreement to required implementation.	-

Question 19:	Do you agree that this solution should be implemented alongside MHHS Code Changes at MHHS Milestone 8 and be effective from the implementation date? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	Yes	-
BUUK (Independent DNO)	No response given	-
EDF Energy (Energy Supplier)	Yes	-
National Grid Electricity Distribution (DNO)	As this change will require minimal lead time we agree that this solution could be implemented alongside the MHHS code changes at MHHS milestone 8 and be effective from the implementation date.	-

Scottish Power (Energy Supplier)	Please see comments above.	-
Scottish Power Energy Networks (DNO)	Yes, there is no reliance on data changes for this solution.	-
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	It is not clear from the proposal what the implementation date will be and therefore we are unable to provide a rationale for this. We agree that implementation should be completed alongside the M8 Milestone however it is not clear whether this would also mean that should the MHHS programme be rebaselined, and the milestones amended, would this change also require amendment	Code Manager comment provided in Question 7 above.

Question 20:	Do you have any other comments on this proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	No response given	-
BUUK (Independent DNO)	No response given	-

EDF Energy (Energy Supplier)	We disagree with this option as the top line is used in a number of our processes.	The Code Manager notes the response.
National Grid Electricity Distribution (DNO)	No response provided	-
Scottish Power (Energy Supplier)	Please see comments above.	-
Scottish Power Energy Networks (DNO)	None.	-
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No.	-