RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0083 – CHANGES TO SUPPLY NUMBER FORMAT FOR MHHS

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

On 09 June 2023 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report 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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LEAD ANALYST	HARRIET TRUSS

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Question 1:	Do you ask Consumers to provide you with information from the top line of the Supply Number by referencing their bill or annual statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply Ltd (Energy Supplier)	No, however there are instances where the information provided by the TPI does not reflect what appears on the EES. In these instances, the information on the top line is used for verification purposes.	The response is useful and has been noted in relation to non-Domestic only.
ENGIE (Energy Supplier)	This information could be requested from customers in the course of resolving queries.	-
OVO Energy (Energy Supplier)	No.	-
National Grid Electricity Distribution (DNO)	No – as a DNO we already hold that information within our systems therefore we do not require clarification from the Consumer.	The response is useful and has been noted.
Brook Green Supply (Energy Supplier)	No	-
BUUK (Independent DNO)	No.	-
EDF Energy (Energy Supplier)	Yes, when quoting an I&C customer directly or via a 3rd party we will ask for their top line.	The response is useful and has been noted.
ScottishPower Energy Retail Ltd (Energy Supplier)	No as this information is readily available within the industry APIs.	The response is useful and has been noted.
Scottish Power Energy Networks (DNO)	No, as a DNO we would only ask the customer for the MPAN	The response is useful and has been noted.

Question 2:	If the top line was removed from the Supply Number, on Consumer bills/annual statements, would you be able to identify the information that supports the same business processes through alternative source/s using the MPAN (provided in the bottom line) only? Please provide details of those sources of information, including where this is different for Domestic or non-Domestic Consumers.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply Ltd (Energy Supplier)	Yes, however this information is widely used by TPI's and therefore it is beneficial for this to remain in place. As we are a non-domestic only supplier, we cannot comment on the potential differences between domestic and non-domestic.	The response is useful and has been noted in relation to non-Domestic only.
ENGIE (Energy Supplier)	Not easily. The retention/addition of the items detailed in R0083 will enable business processes to be supported more efficiently, particularly in the quotation and sales processes where parties (for example third party intermediaries) may find it difficult to obtain the information for other sources such as EES, and where the customer is a larger non-domestic customer with more complex configurations.	The detail provided in the response is useful and the points have been noted.
OVO Energy (Energy Supplier)	Yes, we do not believe that there is any value in maintaining any data items other than the MPAN within the S Number. We are therefore are supportive of R0083A. R0083A will be quicker, cheaper, and easier to implement.	The response is useful and has been noted.

National Grid Electricity Distribution (DNO)	As a DNO we hold the information in respect of the consumer's registration information – currently PC, SSC, MTC and LLF. This will continue to be the case for those items that are retained under MHHS and the new data items used in registration including Domestic and non-Domestic Consumers within our MPRS system.	The detail provided in the response is useful and the points have been noted.
Brook Green Supply (Energy Supplier)	Yes	-
BUUK (Independent DNO)	Yes.	-
EDF Energy (Energy Supplier)	Although we would be able to source this information for the sites, we are quoting via EES/ECOES API calls using the MPANs, the customer wouldn't have this information. If we then needed to discuss their quote with them, they wouldn't be able to confirm if the top line we quoted against was correct, or potentially understand why different quotes are different where the top lines were mismatched.	The detail provided in the response is useful and the points have been noted.
ScottishPower Energy Retail Ltd (Energy Supplier)	Yes, see above.	-
Scottish Power Energy Networks (DNO)	As a DNO we would hold additional information on our internal systems. This may be different for Suppliers	The response is useful and has been noted.

Question 3:	Do you agree the proposed solution resolves the problem statement? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
R0083		
SSE Energy Supply Ltd (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.	The response is useful and has been noted.
ENGIE (Energy Supplier)	Yes, we are supportive of R0083.	-
OVO Energy (Energy Supplier)	No, we do not agree that domestic customers need the information in the top line of the S Number. R0083 is above and beyond what is needed for the vast majority of customers. R0083A preserves the MPAN and should therefore be implemented. Rationale: Non-domestic customers may require this info. However, necessitating all bills contain an updated top line as per R0083 to enable a small cohort of non-domestic customers to see some info that they may or may not be used is vastly disproportionate to what is needed. If non-domestic suppliers need to provide info to their customers, a separate change that excludes impacts on the domestic market could be raised. Placing implementation and maintenance costs on domestic suppliers	Responses from other Suppliers confirms that some Domestic customer processes are reliant on the top line information via the bill or annual statement. The Code Manager does not believe that splitting the prescription of the Supply Number for Domestic and non-Domestic is appropriate. This would add complexity to the solution, and implementation, and would create confusion for those properties that are not clearly categorised in these terms. For example, Micro-business or large Domestic

	for the benefit of non-domestic market would not only be superfluous, but would remove resources that could otherwise be implementing MHHS solutions.	properties and small non-Domestic properties.
National Grid Electricity Distribution (DNO)	Yes, we believe that Option 1 to maintain the PC, SSC and DUoS Tariff Id, resolves the problem statement and provides a good solution for all parties and the consumer.	The response is useful and has been noted.
Brook Green Supply (Energy Supplier)	Yes	-
BUUK (Independent DNO)	Yes	-
EDF Energy (Energy Supplier)	Yes, 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.	The detail provided in the response is useful and the points have been noted.
ScottishPower Energy Retail Ltd (Energy Supplier)	No we believe there is no real customer benefit having a supply number anymore as the information is readily available within industry APIs. 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 in the response is useful and the points have been noted.
Scottish Power Energy Networks (DNO)	Yes	-
R0083A		
SSE Energy Supply Ltd (Energy Supplier)	Yes, however we do believe this option is more complex than R0083.	The response is useful and has been noted.

ENGIE (Energy Supplier)	No, we are not supportive of R0083A as the removal of top line information could adversely affect the efficiency of current business processes as noted above.	The response is useful and has been noted.
OVO Energy (Energy Supplier)	Yes.	-
National Grid Electricity Distribution (DNO)	Yes, we agree that to remove the top line of the Supply Number entirely resolves the problem statement however, we recognise that although this would be a simpler solution, it would not necessarily be in the best interest of the consumer.	The response is useful and has been noted.
Brook Green Supply (Energy Supplier)	Yes	-
BUUK (Independent DNO)	Yes – however we believe R0083 does so more effectively.	The response is useful and has been noted.
EDF Energy (Energy Supplier)	No, as noted we believe the top line needs to be retained.	-
ScottishPower Energy Retail Ltd (Energy Supplier)	This is our preferred solution although we do not believe it is the most efficient for industry or customers.	The response is useful and has been noted.
Scottish Power Energy Networks (DNO)	No, we do not believe that the provision of the MPAN is detrimental to the customer as they may no longer have all the information required such as tariff id	The response is useful and has been noted.

Question 4:	Do you agree with the proposed legal text? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
R0083		
SSE Energy Supply Ltd (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 has previously considered whether additional clarity is required in the legal text but concluded that this is not appropriate. However, an implementation guidance document has been created to be attached to the Final Change Report.
ENGIE (Energy Supplier)	No comment.	-
OVO Energy (Energy Supplier)	Yes.	-
National Grid Electricity Distribution (DNO)	Yes we agree with the proposed legal text.	-
Brook Green Supply (Energy Supplier)	Yes	-
BUUK (Independent DNO)	Yes	-

EDF Energy (Energy Supplier)	Yes - we haven't identified any issues with the proposed legal text.	-
ScottishPower Energy Retail Ltd (Energy Supplier)	Do not agree with the solution.	This response has been noted but not in relation to whether the legal text is appropriate for the R0083 solution.
Scottish Power Energy Networks (DNO)	Yes	-
R0083A		
SSE Energy Supply Ltd (Energy Supplier)	We do not have any significant concerns with regards to the legal text.	-
ENGIE (Energy Supplier)	No comment.	-
OVO Energy (Energy Supplier)	Yes.	-
National Grid Electricity Distribution (DNO)	Yes we agree with the proposed legal text.	-
Brook Green Supply (Energy Supplier)	Yes	-
BUUK (Independent DNO)	Yes	-
EDF Energy (Energy Supplier)	Yes - we haven't identified any issues with the proposed legal text.	-

ScottishPower Energy Retail Ltd (Energy Supplier)	As above, it is preferred above R083 but is not our preferred solution.	This response has been noted as agreement that the legal text is appropriate for the R0083A solution.
Scottish Power Energy Networks (DNO)	Yes	-

Question 5:	Do you agree with the proposed implementation date and implementation techniques? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
R0083		
SSE Energy Supply Ltd (Energy Supplier)	We believe that implementation should start at milestone M14 as this will be at the point the market needs to comply. There is a significant risk that should the earlier milestones be used, this will impede those who are not ready.	The proposed solution allows for population of the Supply Number for both migrated and non-migrated MPANs. It is only the DUoS Tariff Id data item that relies on a Supplier's MHHS readiness, and this should be populated with the existing Line Loss Factor Configuration (LLFC) Id for any non-migrated MPANs. Alignment of the change to M14 would mean that between M8/M10 and M14 those supplying MHHS migrated MPANs would be

		unable to provide the Supply Number as prescribed in the Data Specification.
ENGIE (Energy Supplier)	Yes.	-
OVO Energy (Energy Supplier)	No, this modification should not be implemented for aforementioned reasons.	This response has been noted but not in relation to whether the implementation date is appropriate for R0083.
National Grid Electricity Distribution (DNO)	Yes we agree with the proposed implementation date and implementation techniques.	-
Brook Green Supply (Energy Supplier)	Yes	-
BUUK (Independent DNO)	Yes	-
EDF Energy (Energy Supplier)	Yes, we agree that this change should be implemented at Milestone M8, which is currently planned for July 2025.	The current baseline of the MHHS programme plan sets M8 as 07 March 2025, which has an associated 3-month contingency. The Code Manager notes that there may be changes in the approved milestone dates in the future and recommends they should be determined from the MHHS Programme website planning pages here.
ScottishPower Energy Retail Ltd (Energy Supplier)	Yes	-

Scottish Power Energy Networks (DNO)	Yes	-
R0083A		
SSE Energy Supply Ltd (Energy Supplier)	We believe that implementation should start at milestone M14 as this will be at the point the market needs to comply. There is a significant risk that should the earlier milestones be used, this will impede those who are not ready.	See Question 5, R0083, Code Manager comment above.
ENGIE (Energy Supplier)	Yes.	-
OVO Energy (Energy Supplier)	Yes.	-
National Grid Electricity Distribution (DNO)	Yes we agree with the proposed implementation date and implementation techniques.	-
Brook Green Supply (Energy Supplier)	Yes	-
BUUK (Independent DNO)	Yes	-
EDF Energy (Energy Supplier)	If approved, it would be possible to implement this change at Milestone M8.	-
ScottishPower Energy Retail Ltd (Energy Supplier)	Yes	-
Scottish Power Energy Networks (DNO)	Yes	-

Question 6:	Do you agree with the Code Manager's assessment of the Change Path, that these Change Proposals should be subject to Authority Determination?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply Ltd (Energy Supplier)	Yes, we agree.	-
ENGIE (Energy Supplier)	Yes.	-
OVO Energy (Energy Supplier)	Yes.	-
National Grid Electricity Distribution (DNO)	Yes we agree.	-
Brook Green Supply (Energy Supplier)	Yes	-
BUUK (Independent DNO)	Yes	-
EDF Energy (Energy Supplier)	Yes – given the link to the licence obligations around Supply Number we agree that this requires Authority Determination.	-
ScottishPower Energy Retail Ltd (Energy Supplier)	Yes.	-
Scottish Power Energy Networks (DNO)	Yes	-

Question 7:	Based on the Business Case Assessment and Case for Change, do you agree with the Code Manager's recommendation that Change Proposal R0083 should be approved, and R0083A rejected, for implementation on the date that will be determined by the MHHS Programme for M8 – 'Code Changes delivered'? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply Ltd (Energy Supplier)	Yes, we believe R0083 should be accepted and R0083A should be rejected however as per our response to Q5, we believe this should be implemented at M14.	See Code Manager comments in Question 5 above.
ENGIE (Energy Supplier)	Yes, we support R0083 and are not supportive of R0083A.	-
OVO Energy (Energy Supplier)	No, we believe that, apart from the MPAN, the data within the S Number is used by a select few customers only and for non-critical purposes (I.e. pursuit of interest rather than locating tariffs – smart metered customers can obtain any tariff irrespective of the DUOS Tariff ID, for example), and therefore R0083A is preferred. Aligning to M8 is fine.	See Code Manager comments above.
National Grid Electricity Distribution (DNO)	We feel that there has been no clear industry support for any one of the two solutions proposed, therefore, in order to move forward and to reach a resolution we agree with the Code Manager's recommendation that R0083 should be approved and R0083A should be rejected. Whilst we feel that 83A is a simpler solution we recognise it would not necessarily be in the best interest of the consumer.	The Code Manager acknowledges about supports the pragmatic approach in the response.

Brook Green Supply (Energy Supplier)	Yes we accept and agree with the recommendation that R0083 is preferable to R0083A. This will keep it as consistent as possible with the current process, which should reduce confusion for suppliers and customers.	-
BUUK (Independent DNO)	We agree with the Code Manager's recommendation.	-
EDF Energy (Energy Supplier)	Yes, we agree that R0083 should be accepted and R0083A rejected.	-
ScottishPower Energy Retail Ltd (Energy Supplier)	No as noted above.	-
Scottish Power Energy Networks (DNO)	Yes	-

Question 8:	Do you have any other comments relating to these Change Proposals?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply Ltd (Energy Supplier)	Not at this time.	-
ENGIE (Energy Supplier)	No.	-
OVO Energy (Energy Supplier)	No.	-

National Grid Electricity Distribution (DNO)	None.	-
Brook Green Supply (Energy Supplier)	No	-
BUUK (Independent DNO)	N/A	-
EDF Energy (Energy Supplier)	We are in favour of R0083, retaining and updating the top line. Although as supplier we can gather the top line information via API calls to EES, customers won't have this ability, this could make discussing and understanding different quotes difficult for them.	-
ScottishPower Energy Retail Ltd (Energy Supplier)	We believe our proposed solution to provide a MPAN but not mandate how it should appear on the bill is a more efficient solution to the industry and customers.	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)	No additional comments	-