RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0191 INTRODUCTION OF SLA FOR SUPPLIER DE-REGISTRATION ON DISCONNECTED METERS

On 20 June 2025 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0191 Introduction of SLA for Supplier De-Registration on Disconnected Meters.

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	24 July 2025
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Caroline Freimuller

DATE CONSULTATION ISSUED	20 June 2025
RESPONSE DEADLINE	11 July 2025

Question 1:	Do you agree with the proposed solution? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE agrees with the proposed solution.	Thank you for your comments.
Npower Commercial Gas (Energy Supplier)	Yes – In principle we agree with the proposed solution. We would however like to add some additional steps to the process being considered. At present it is possible for a Supplier to receive and unexpected Disconnection flow from the DNO when the meter point is "Energised" and "still has a meter attached". We would like to see the inclusion of a step that means that DNO cannot issue a Disconnection flow whilst the Meter Point is in this state. Instead, we believe that DNO should be mandated to raise a query with the Supplier (potentially via SDEP). In adding the above step this will help manage the burden between Suppliers and DNO's in Disconnections being issued and then rejecting and potentially having to raise MAP04's to sort out. It would also reduce the risk of Suppliers not rejecting the Disconnection and processing the deactivation as required by this change proposal and a live meter being incorrectly Disconnected and Deactivated.	Thank you for your comments. The scope of this change is only to add in a timescale in which Suppliers are required to send the Registration De-activation Request to the CSS, or raise a query on the Secure Data Exchange Portal (SDEP) with the relevant DNO if they believe the Metering Point should not be Disconnected, within 20 Working Days of receiving the notification of Disconnection from the Electricity Retail Data Agent (ERDA). The Code Manager would welcome Npower or any other Party raising a Change Proposal if they feel other aspects of the Code are not working. However, emergency disconnections are required for a purpose, and there are many scenarios where it is valid for a DNO to disconnect a meter

		showing as energised and in place - e.g. fire. This would also likely need to be a cross-code change between REC, DCUSA and BSC. MAP04 transitioned to BSC as part of CSS go live and is now BSCP604, if there are concerns about this process this needs to be raised to the BSC. However, if you have examples of large numbers of MAP04s being rejected by DNOs, please submit this to the Code manager as evidence for the business case of REC Change R0095 (which is currently on hold).

Question 2:	Do you agree with the proposed implementation approach (Big Bang)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE supports the proposed implementation approach.	Thank you for your comments.
Npower Commercial Gas (Energy Supplier)	Yes we agree with the proposed implementation approach.	Thank you for your comments.

Question 3:	Do you agree with the Code Manager' s assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE agreed with the assessed costs and benefits of this change,	Thank you for your comments.
Npower Commercial Gas (Energy Supplier)	Yes	Thank you for your comments.

Question 4:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the REC Change Panel ?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	This change has no need for authority decision and so we agree that the change should be subject to self-governance approval.	Thank you for your comments.
Npower Commercial Gas (Energy Supplier)	Yes	Thank you for your comments.

Question 5:	Do you agree with the Code Manager' s recommendation that this Change Proposal should be approved for implementation on 07 November 2025? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	This change requires no system work for us and so we agree that this change should be implemented in November 2025.	Thank you for your comments.
Npower Commercial Gas (Energy Supplier)	We believe that this Change Proposal should be delayed until February 2026 as there are likely to be system changes for Suppliers to ensure that appropriate actions are taken within the timescales required. This cannot commence until the Change has been approved and as we are already in July 2025 this reduces the development time needed.	Thank you for your comments. We have taken this under consideration but do not see what system changes will be required as there is no change in the process, only the timescales in which the process needs to be done. Two Energy Suppliers responded at Party impact assessment and stated they needed no lead time for the implementation of this change. There is also an expectation a cleanse of this data may be required for MHHS migration. As such, the Code Manager will leaving the proposed implementation date as 07 November 2025.

Question 6:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	We would like more details on how suppliers that are non-compliant with the new SLA will be identified and notified.	Thank you for your comments. The Performance Assurance team have confirmed they currently do not see this as a major risk area which requires active monitoring and assurance. However, as they review Retail Risks periodically, if this position changes, the Code Manager will consult via the Risk Register and PARC review before introducing new measures. In the interim, Parties requiring support to resolve operational issues bilaterally can seek support from their REC OAMs. We will work with the OAMs to understand if this is becoming an area of growing concern and factor their feedback into our risk assessment.
Npower Commercial Gas (Energy Supplier)	See answer to Q1. We also have concerns that Suppliers consistently see Meter Points which have been demolished and where the DNO has not issued (within the required timeframes) the relevant Disconnection flows. This appears to be as a result of a disconnect between DNO back office	Thank you for your comments. If Npower have evidence where the D0171 is not being sent by the ERDA within 1 working day as required by REC Schedule 27, this can be escalated via your REC OAM. If there

	teams and project teams managing major disconnections. We would like to see DNO improvements in the timeliness of them informing of Disconnections.	are concerns DNOs are not compliant with timescales held under the BSC or DCUSA, these need to raised those codes respectively.