RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	**Consultation**
04	Final Recommendation

CHANGE REPORT

R0205 – PROVISION OF HALF-HOURLY CONSUMPTION DATA FOR ADVANCED METER ERRONEOUS SWITCHES

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	07/11/2025
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	CHANGE PANEL	**CHANGE PATH**	SELF-GOVERNANCE
PRIORITY STATUS	MEDIUM	**URGENCY**	STANDARD
IMPACTED STAKEHOLDERS	ENERGY SUPPLIERS, CONSUMERS, METER OPERATOR AGENTS		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	ASSURANCE LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

If an Erroneous Switch has been raised and agreed between Energy Suppliers, to be able to accurately bill an Advanced Meter site following the repatriation of the Consumer to their correct Energy Supplier, the supplier needs access to Half-Hourly consumption data for the Erroneous Switch period when the Consumer was not with the Registered Supplier.

This Change Proposal looks to ensure an Energy Supplier could reliably source the Half-Hourly consumption data from another (Losing) Supplier.

CODE MANAGER'S MINDED-TO-POSITION

The Code Manager's minded-to-position is that the REC Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 07 November 2025

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BACKGROUND

1 SUMMARY

As part of the Market-wide Half Hourly Settlement (MHHS) REC Code change activity, a change has been made to REC Schedule 30 – Resolution of Consumer Facing Switching and Billing Issues to remove the Half-Hourly meter exemption from the Erroneous Switch provisions. Whilst this is necessary from an MHHS perspective, with all sites becoming Half-Hourly settled, the application of Erroneous Switch obligations in the Advanced Meter segment creates some additional challenges.

To be able to accurately bill an Advanced Meter site, following repatriation of that Consumer to their correct Energy Supplier after an Erroneous Switch has been raised and agreed, the Energy Supplier (the Gaining Supplier) needs to have access to Half-Hourly consumption data for the Erroneous Switch period when they were not the Registered Supplier. With Erroneous Switches potentially taking up to two years to be identified and resolved, the only place that an Energy Supplier could reliably source that Half-Hourly consumption data would be from the Losing Supplier. In the absence of having Half-Hourly consumption data for these Erroneously Switched Consumers, Energy Suppliers would be required to estimate consumption for billing purposes. This can lead to Consumer detriment through incorrect billing and a poor Consumer experience.

Subject to solution analysis and solution development, progression of this Issue may see an obligation placed upon Losing Suppliers, following a successful Erroneous Switch repatriation, to provide the Gaining Supplier with Half-Hourly consumption data for the period in which they were erroneously supplying the meter. This Half-Hourly consumption data would consist of 48 Half-Hourly consumption intervals for each day that a Consumer was supplied by the erroneously Gaining Supplier. This data could then be shared via the REC's secure means of sharing data, the Secure Data Exchange Platform (SDEP).

There is a possibility that the Half-Hourly consumption data could be provided in the future through Elexon via their Kinnect Insight Platform API. However, whilst this may provide an enduring solution (subject to further discussions and confirmation), this would not be available at MHHS go-live, or potentially until the service has accrued sufficient consumption history. As such, this REC Issue is required.

2 PROBLEM STATEMENT

Energy Suppliers are required to estimate consumption for billing purposes for erroneously Switched Consumers. Without access to Half-Hourly consumption data, Energy Suppliers may be inaccurately billing their Consumers due to inaccurate estimations.

3 IMPACTS

CONSUMERS
Electricity
Microbusiness
Industrial & Commercial (I&C)
Small and Medium Enterprise (SME)

REC DOCUMENTS AND PRODUCTS
Schedule 17 – Secure Data Exchange
Schedule 30 – Resolution of Consumer Facing Switching and Billing Issues
Standards Definition

REC SERVICE PROVIDERS
Electricity Enquiry Service (EES)
Secure Data Exchange Service (SDES)

REC PARTIES AND SERVICE USERS
Energy Suppliers

RECCO/ REC CODE MANAGER
REC Performance Assurance

MHHS DESIGN
No design impact.

MHHS DATA SPECIFICATION
No data specification impact.

MHHS CODE DRAFTING
No code drafting impact (see assumption I0205.CPP.A001)

4 CROSS-CODE IMPACTS

No cross-code impacts have been identified by the Code Manager.

The proposer, however, has noted that they are engaging separately with Elexon to understand if the Half-Hourly consumption data could be provided in the future via their Kinnect Insight Platform APIs. Dependent upon this engagement, and the chosen solution for this Issue, should cross-code impacts be discovered, or if cross-code engagement is required, the Code Manager will engage with the Cross-Code Steering Group (CCSG) to determine the most suitable approach.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**01 Apr-25**	**30-Jul-25**
	Solution Analysis	April	May
	Change Issues Group Engagement	May	June
	Solution Development	May	June
	Legal Review	June	June
	Impact Assessment	June	July
	Solution Refinement	July	July
Change Proposal		**01 Aug-25**	**06-Oct-25**
	Business Case Assessment	August	August
	Consultation	August	September
	Final Assessment	September	September
Voting		**07 Oct-25**	**07-Oct-25**
	Appeal Window	08 October	22 October

6 STAKEHOLDER ENGAGEMENT

The Code Manager has engaged with the REC Change Issues Group to discuss this Change Proposal, including the impacts Parties are currently experiencing, and potential solution options. There have been further opportunities for stakeholder engagement via a Party impact assessment, in June 2025, and a standard industry consultation that will take place between August and September 2025.

The Code Manager introduced this Issue at the May Change Issues Group meeting on 01 May 2025. The minutes for this discussion can be found on the REC Portal, here. The Code Manager further provided an update to the Change Issues Group at the June meeting (05 June 2025), to offer further clarity and support ahead of the Party impact assessment. This included the chance for attendees to comment on the draft legal text for the solution. The minutes for this discussion can be found on the REC Portal, here.

Following the Party impact assessment, the Code Manager provided another update at the August Change Issues group meeting on 07 August 2025.The Code Manager provided an overview of the Party impact assessment and offered attendees to make any further solution refinement suggestions ahead of the industry consultation. Stakeholders were invited to discuss the proposed SLA obligation for Energy Suppliers, the reporting template requirements, and required lead times. The minutes for this discussion can be found on the REC Portal, here.

7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	2	27	53
	Retail Markets Impact	Innovation and Market Arrangements	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	1	14	14
Resource	Complexity / Effort / Duration		1	9	9
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		1		8
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	2	10	20
				Overall Priority Score (rounded)	143

Priority Status	MEDIUM
Change Proposal Type	STANDARD

This Issue has been given a priority status of medium based upon a weighted prioritisation score of 143.

SOLUTION

8 PROPOSED SOLUTION

The proposed solution sees an obligation added to the REC for the Gaining Supplier to provide Half-Hourly consumption data to the Losing Supplier for the period they were the Registered Supplier. This data may be actual or estimated reads, to factor in for Non-Communicating Smart Meters, dependent on the data available to the Gaining Supplier. The Gaining Supplier will be required to share this data within 5 Working Days of the Erroneous Switch being agreed via a reporting template. This reporting template would be shared using the PT0047 – Erroneous Transfers General Query (Elec) screen on SDEP in a CSV file format.

Following any proposed implementation of this Change Proposal and the scheduled MHHS go-live in September 2025, the proposed solution will apply to all Erroneous Switches that are mutually agreed upon by the Gaining and Losing Suppliers. This includes cases where the Erroneous Switch period occurred either before or after the MHHS go-live date. Consequently, the obligation to share Half-Hourly consumption data will apply in all such instances, regardless of the timing of the Erroneous Switch.

Legal text will also be included to instruct that if the Gaining Supplier uses reverse migration and lacks Half-Hourly consumption data, they must still provide any available register readings from their time as the Registered Supplier to the Losing Supplier.

To implement this proposed solution, the Code Manager proposes the insertion of the following legal text clauses into Schedule 30 – Resolution of Consumer Facing Switching and Billing Issues, as paragraph 6.8B and 6.8C:

"6.8B For Advanced Electricity Meters, once the Losing Supplier has re-registered the RMP, the Gaining Supplier must provide the Losing Supplier with the Half-Hourly consumption data held (actual or estimated) for the period they were the Registered Supplier within 5 Working Days of the Erroneous Switch being agreed in accordance with 6.9.11. This must be provided using Market Messages PT0047 Erroneous Transfers General Query (Elec) within SDEP using the Advanced Meter Half-Hourly Consumption Data Template provided by the Code Manager in Appendix XX."

"6.8C In relation to 6.8B, where the Gaining Supplier has used the reverse migration process and does not have Half-Hourly consumption data to provide, the Gaining Supplier must provide the Losing Supplier with any register readings held for the period they were the Registered Supplier"

The interface table in paragraph 6.9 will also be amended, introducing a new process under 6.9.11 to reflect the new obligation for the Gaining Supplier to provide the Half-Hourly consumption data for the period of they were the Registered Supplier. This process will be listed in the interface table as follows:

Ref.	When	Action	From	To	Interface	Means
6.9.11	For Advanced Electricity Meters, as soon as reasonably practicable following 6.9.4, but no later than 5 Working Days.	Provide Half-Hourly consumption data for the period the Gaining Supplier were the Registered Supplier.	Gaining Supplier	Losing Supplier	PT0047 Erroneous Transfers General Query (Elec), in CSV file in the format set out in the annex to this Section B.)	SDEP

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0205 can be found here.

9.1 DRAFT REPORTING TEMPLATE

The final draft design of the reporting template, titled the Advanced Meter Half-Hourly Data Sharing template, has been provided for consultation, and once fully developed, will be included as an Appendix within Schedule 30 – Resolution of Consumer Facing Switching and Billing Issues.

The Advanced Meter Half-Hourly Data Sharing template can be found here.

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PRELIMINARY ASSESSMENT

10 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

A Party impact assessment was conducted from 20 June 2025 to 11 July 2025. In total three responses were received from Energy Suppliers. The non-confidential responses have been published here.

A summary of the Party Impact Assessment responses can be found in the table below.

ENERGY SUPPLIERS	• **General Support Received:** Two of the respondents agreed that the proposed solution addresses the problem statement, however one respondent did not believe this Change Proposal should proceed in its current form, noting that they have not had any issues with availability of Half-Hourly consumption data. • **Data Availability:** Respondents highlighted scenarios where Half-Hourly consumption data may not be available, and therefore the solution may require further flexibility. Suggestions were made to allow the use of total consumption data, or estimated reads, instead. • **Legal Text SLA Clarification:** Respondents asked to clarify in the legal text the 5 Working Day SLA previously shown in the draft interface table, with one respondent asking that the SLA begins from the supply Switch date, rather than the date the Erroneous Switch was agreed. • **Reporting Template Preferences:** Respondents were divided between the two draft reporting templates provided. Template 1 was seen as simpler, but template 2 provided more detailed information to assist Energy Suppliers. Suggestions were made to consolidate and improve consistency, with one respondent providing their own draft template for consideration. • **Implementation and Lead Times:** Some respondents asked for longer lead time post approval before implementation, with requests ranging from 6-9 months, citing possible system changes and MHHS resource constraints. • **Mixed Business Impacts:** Some respondents believed they would see expected benefits in billing accuracy for their Consumers, whilst other respondents believed the change would provide minimal or no benefits to their organisation. Expected costs varied between Energy Suppliers, with some respondents expecting no costs associated with this change, whilst others expect between £0 - 49,999.

11 BUSINESS CASE ASSESSMENT

11.1 COSTS

There is no central system costs associated with this Change Proposals since the requirements to use SDEP to share the Half-Hourly consumption data utilises an existing Process Type.

At Party impact assessment, one Energy Supplier provided a confirmation that there would be no costs associated with this Change Proposal, whilst one further Energy Supplier provided an expected range of between £0 and £49,999.

11.2 BENEFITS

TANGIBLE BENEFITS	BENEFITS DESCRIPTION
REDUCED CONSUMER COMPLAINTS	The proposed solution will lead to improved billing that will mean few billing errors that can be the cause of Consumer complaints. Consumers will not receive unexpectedly high, or low, bills due to inaccurate estimations. Similarly, the obligation to share data within 5 Working Days will result in faster resolution of Erroneous Switches and associated processes, improving the Consumer experience, reducing the likelihood of complaints. With more data, Energy Suppliers will also be able to provide clearer explanations to Consumers about their bills and the Erroneous Switch.
IMPROVED BILLING AND SETTLEMENT ACCURACY	When the Gaining Supplier receives actual Half-Hourly Consumption data from the Losing Supplier, they will be able to bill Consumers based on actual usage, rather than estimated readings and consumption data, ensuring Consumer bills, and settlement, are more accurate. This will lead to Consumer's paying the accurate amount for their usage and more accurate bills can be produced.
REDUCED RISK OF REGULATORY NON-COMPLIANCE	This Change Proposal will result in accurate billing and reduced or resolved Consumer complaints. In doing so, this may lead to a reduced risk of Energy Suppliers breaching Consumer protection regulations and supports compliance with Ofgem's principles around fair treatment of Consumers and accurate billing.

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
DATA SECURITY	R0205 mandates the use of SDEP, as the REC's secure means of sharing data, to share Half-Hourly consumption data. By mandating that REC Parties use SDEP, data will be shared securely and safely as part of the Erroneous Switch repatriation process.

INCREASED MARKET COLLABORATION AND CONSUMER FOCUS	The proposed solution increases market collaboration between the impacted Energy Suppliers. This will help create more constructive relationships across the industry and will promote shared responsibility for Consumer outcomes, rather than individual accountability. By introducing the obligation for Losing Suppliers to provide Half-Hourly consumption data, it reinforces that Consumer welfare is a shared priority, not just the responsibility of the Energy Supplier currently serving the Consumer.
IMPROVED CONSUMER TRUST AND CONFIDENCE	With quick resolutions, and accurate billing, Consumers are more likely to have trust in the Energy Market, even after complex issues such as Erroneous Switches. Further, by witnessing increased market collaboration, Consumers will have greater confidence in Energy Suppliers' procedures and commitment to Consumer welfare.

11.3 COST BENEFIT ANALYSIS

There is no central system costs associated with this Change Proposal, and only one Energy Supplier has provided a range of expected costs between £0-49,999. Based upon the benefits detailed in section 11 of this Change Report, the Code Manager believes the cost and effort of the implementation of this Change is proportionate to the benefits being brought by the proposed solution.

This proposal will reduce Consumer detriment as it enables accurate billing through secure data sharing and improved resolution times. The intangible benefits, such as enhanced Consumer trust and confidence in the market, fewer complaints, and stronger Energy Supplier collaboration, outweigh the potential associated costs.

12 CASE FOR CHANGE

The Code Manager considers the case for change to be justified on the basis that:

- The proposed solution directly resolves the problem statement;
- The cost-benefit analysis demonstrates a strong business case, with multiple benefits for Energy Suppliers and Consumers against a potential associated cost;
- If implemented, the proposed solution delivers positive Consumer outcomes, reducing Consumer detriment, by ensuring an obligation for Energy Suppliers to share Half-Hourly consumption date is in place to help ensure accurate bills for Consumer for the period they were Erroneously Switched;
- The proposed solution improves market efficient and promotes collaboration between Energy Suppliers and protects Consumer welfare; and
- The change has a strong business case as detailed in sections 11 and 12 of this Change Report.

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13 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

No risks, or dependencies have been identified by the Code Manager at this stage.

13.1 ASSUMPTIONS

NO.	ASSUMPTION	NOTES	STATUS
I0205.CPP.A001	I0205 will be implemented post M8 and will therefore not impact MHHS Code drafting.	On the assumption this Change Proposal would be implemented post M8 of the MHHS Programme, any legal drafting would be made against the R0209 baselines for Schedule 30.	Open. This will be reviewed once a proposed implementation date has been confirmed in the Final Recommendation.
I0205.CPP.A002	Use of Process Types PT0047 and PT0048.	There is currently an assumption that this solution involves sharing the Half-Hourly consumption data via SDEP and the existing Process Type PT0047 – Erroneous Transfers (Electricity) General Query. As such, no new Process Types would require development by the SDEP Service Provider.	Closed. Use of PT0047 included in the proposed solution.

13.2 ISSUES

NO.	ISSUE	NOTES	STATUS
I0205.I001	Non-Communicating Smart Meters	If the meter is not communicating and the Energy Supplier has no Half-Hourly reads for the period they were registered, they would not be able to provide the Half-Hourly consumption data. In such a scenario, the Gaining Supplier may need their Meter Operator Agent to visit the Site to recover the reads manually. This issue will have to be addressed in the final solution.	Closed. The Code Manager has included the possibility for Energy Suppliers to share estimated reads. These can be used when Half-Hourly consumption data is not available.

14 APPENDIX

CHANGE PROPOSAL	Link
CHANGE ISSUES GROUP	01 May 2025 - Minutes 05 June 2025 – Minutes 07 August 2025 - Minutes
LEGAL DRAFTING AND REPORTING TEMPLATES	Schedule 30 – Resolution of Consumer Facing Switching and Billing Issues (extract for Party impact assessment 10.06.2025) Half-Hourly Consumption Reporting Templates (drafts for Party impact assessment 10.06.2025) Schedule 30 – Resolution of Consumer Facing Switching and Billing Issues (extract for consultation 15.08.2025) Advanced Meter Half-Hourly Consumption Data Sharing Template (for consultation 15.08.2025)
ELEXON KINNECT PLATFORM	Link

15 GLOSSARY

TERM	DEFINITION
Advanced Meter	has the meaning given to it in the Gas Supply Licence (for gas) or the Electricity Supply Licence (for electricity).
Cross-Code Steering Group (CCSG)	means the group of that name described in Paragraph 3 of the Change Management Schedule.
Erroneous Switch	means where a Consumer has been switched to an Energy Supplier which does not have an Energy Contract in place, as further described in the Resolution of Consumer-Facing Switching and Billing Problems Schedule.
Gaining Supplier	means, in relation to a proposed Switch (or Switch), the Energy Supplier which is proposing to become the Registered Supplier at an RMP as a result of that proposed Switch (or which has become the Registered Supplier as a result of that Switch).
Half-Hourly	refers to electricity being traded and/or settled on a half hourly basis.

TERM	DEFINITION
Losing Supplier	means, in relation to a proposed Switch (or Switch), the Energy Supplier which will cease to be the Registered Supplier at an RMP as a result of that proposed Switch (or which has ceased to be the Registered Supplier as a result of that Switch).
Secure Data Exchange Platform (SDEP)	means the portal of that name which forms part of the Secure Data Exchange Service.