RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

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

On 15 August 2025, the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0205.

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
DATE ISSUED	09 September 2025
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	James Hardy

DATE CONSULTATION ISSUED	15/08/2025
RESPONSE DEADLINE	09/09/2025

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Ovo Energy (Energy Supplier)	We agree with the proposed solution in principle however we would like to highlight some general concerns: • PT0047 (General Electric Query) is not a relevant place to store queries of this type especially where there are additional obligations placed on the erroneously gaining supplier. • Where the meter is not communicating, it is difficult for the erroneously gaining supplier to provide estimated readings for a supply point they have no history for.	Thank you for your response. The Code Manager has proposed using process type PT0047 for this Change Proposal and has actively engaged with industry to explore its suitability. No evidence has been presented to suggest this approach is inappropriate, nor have any alternatives been proposed. Given the urgency of addressing Consumer detriment and aligning with the M10 MHHS Milestone, creating a new process type would be inefficient and risk delaying implementation. This Change Proposal is intended as a short-term solution ahead of Elexon's Kinect platform, making timely delivery essential. Under R0205, Energy Suppliers will be required to share any available data. Even where meters are non-communicating, Suppliers should be able to provide estimated readings, as these are necessary for billing Consumers.

Centrica (Energy Supplier)	We do agree with the proposed solution and the need for change; however, we have concerns regarding the feasibility of the 5 working day Service Level Agreement (SLA). Specifically, this timeframe does not provide adequate time to source and prepare the necessary half-hourly consumption data. The gaining Supplier will need to liaise with the appointed Data Services agent to obtain the required data and wait for this to be received before being able to share via SDEP. The process of gathering, validating, and compiling this data can be time-consuming, and a 5-working-day window is insufficient to ensure accuracy and completeness. We recommend extending the SLA to allow for a more realistic and manageable timeframe. We also want to take this opportunity to raise our concern regarding when the SLA should commence, the proposed solution states *"The Gaining Supplier will be required to share this data within 5 Working Days of the Erroneous Switch being agreed via a reporting template."* It is our strong view that any SLA should commence from the point at which the status is marked as 'secured active', rather than from when the erroneous transfer is agreed. An erroneous switch can be accepted up to two working days before the supply start date; consequently, objections or rejections within the industry may still occur. We recommend that the SLA should commence once the switch attains 'secured active' status.	Thank you for your response. The Code Manager maintains that a 5 Working Day SLA is appropriate and consistent with similar obligations and timescales under the REC. No clear evidence has been presented during the Change Process to justify extending this SLA. If stakeholders encounter operational challenges following implementation, they will have the opportunity to propose amendments to the SLA through the REC change process. The Code Manager acknowledges the concern but maintains that the current solution offers sufficient clarity for Parties while prioritising a quick resolution of Consumer detriment. If operational issues arise post-implementation, stakeholders can raise change proposals through the REC process to refine this aspect of the solution.

Question 2:	Do you have any comments on the draft legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Ovo Energy (Energy Supplier)	No	Thank you for your response.
Centrica (Energy Supplier)	We have no comments on the draft legal text.	Thank you for your response.

Question 3:	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**
Ovo Energy (Energy Supplier)	We are relying on some system changes to implement these proposals so we would welcome additional time.	Thank you for your response. The Code Manager does not believe the implementation date should be delayed due to the risk of further Consumer detriment. Also, due to the impacts of the MHHS Programme this Change Proposal is required as close to the M10 Milestone as possible. However, the Code Manager intends to bring forward the Responsible Committee vote ahead of the timeline set out in the Proposal Plan, to give Parties additional time to prepare for implementation if the Change Proposal is approved.

Centrica (Energy Supplier)	We agree with the proposed implementation date of 7 November 25.	Thank you for your response.

Question 4:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Ovo Energy (Energy Supplier)	Yes	Thank you for your response.
Centrica (Energy Supplier)	Yes, we agree with the costs and benefits identified.	Thank you for your response.

Question 5:	Do you agree with the Code Manager's Case for Change? If not, please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Ovo Energy (Energy Supplier)	Yes	Thank you for your response.
Centrica (Energy Supplier)	Yes we strongly agree with the need for a solution.	Thank you for your response.

Question 6:	Do you have any other comments relating to the reporting template?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Ovo Energy (Energy Supplier)	No	Thank you for your response.
Centrica (Energy Supplier)	We have no comments on the reporting template.	Thank you for your response.

Question 7:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Ovo Energy (Energy Supplier)	No	Thank you for your response.
Centrica (Energy Supplier)	We have no further comment.	Thank you for your response.