RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0207 – IMPORT / EXPORT MOA CHARGING CLARIFICATION

On 10 April 2026 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0207.

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	V1.0
RESPONSE TYPE	Party/ Non-confidential
DATE ISSUED	11 May 2026
RESPONSIBLE COMMITTEE	Metering Expert Panel
LEAD ANALYST	Holly Law

DATE CONSULTATION ISSUED	10 April 2026
RESPONSE DEADLINE	01 May 2026

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes, we agree with the proposed solution. It is our view that the revised approach provides a pragmatic and proportionate interim solution to the identified problem, by clarifying the minimum export-related services that an Import MOA must provide for associated Export Metering Points without the need for a bilateral contract or direct charging.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	SSE agrees with the proposed solution.	Thank you for your comments.
Anonymous (Energy Supplier)	We support in principal the attempts to make the market more competitive by stopping Export Suppliers charging uncompetitive rates. We do not believe that this solution is allowing sufficient time as per our response to question 5.	Thank you for your comments.
Good Energy (Energy Supplier)	Yes. We support the proposed solution.	Thank you for your comments.

Question 2:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes, we agree.	Thank you.
SSE Energy Supply Limited (Energy Supplier)	Yes.	Thank you.
Anonymous (Energy Supplier)	We are unsure on the impacts of the cost. We would need to develop a specific product as there is a risk that providing these services will impact our contract with the Import Supplier.	Thank you for your comments.
Good Energy (Energy Supplier)	We agree with the highlighted benefits. If approved, we consider that this change will support efficiency, consistency and innovation across the industry. From a supplier perspective, we expect any costs of this change to be minimal.	Thank you for your comments.

Question 3:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to determination by the Authority following a recommendation by the Metering Expert Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes, we agree.	Thank you.
SSE Energy Supply Limited (Energy Supplier)	As this change has the possibility to affect pricing for import metering, we agree this change should be approved by the authority.	Thank you for your comments.
Anonymous (Energy Supplier)	Yes we agree with the process but not the timings	Thank you for your comments.
Good Energy (Energy Supplier)	Yes.	Thank you.

Question 4:	Do MOAs and Export Suppliers require a general operational contact, or are there other specific contacts that are required separately to this? If so, what are these contacts and why are they needed separately to a general contact?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes, we support the requirement for MOAs and Export Suppliers to provide a general operational contact. We raised concerns in our impact assessment of the potential impact on customers who require metering works as they would not be able to arrange this via their Export Supplier. Ensuring that relevant parties provide key operational contacts will help to prevent significant delays for export customers seeking timely resolution of metering issues.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	Our Export customers all have contracts direct with Metering Agents, which we would class as specific contracts. We are not best placed to comment on whether a general contract would be suitable to cover the additional needs of SEG suppliers.	Thank you for your comments.
Anonymous (Energy Supplier)	As per question 2 we are still working to understand the full impacts of this change. This includes the required contractual agreements and process.	Thank you for your comments.
Good Energy (Energy Supplier)	We consider a general operational contact to be sufficient. It is not clear what roles and responsibilities are required separate to a general operational contact. In the case of issues such as missing or inaccurate data, a general operational contact is more than adequate to manage these processes.	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 in the next standard REC release following Authority approval, provided at least 3 months' notice between approval and implementation? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes, we agree.	Thank you.
SSE Energy Supply Limited (Energy Supplier)	Yes.	Thank you.
Anonymous (Energy Supplier)	We believe the process should be slowed down and given a firm agreed date. We feel that 3 month implementation from the next standard REC release is too soon to allow agents to build the necessary cost allocation and engage with suppliers or for import suppliers to manage this with customers / export suppliers.	Thank you for your comments. The implementation date was agreed by the R0207 working group following consideration of the updates Parties would be required to make, with the conclusion that most of these changes would be necessary regardless of the outcome of this Change Proposal. It was also noted within the working group that organisations may have varying and, at the time, uncertain internal review timescales.
Good Energy (Energy Supplier)	From a supplier perspective, we support the implementation in the next standard REC release. In our assessment, three months' notice is sufficient, even more so with the scope clarified to MHHS migrated metering points.	Thank you for your comments.

RETAIL ENERGY CODE

Question 6:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	We have no further comments.	Thank you.
SSE Energy Supply Limited (Energy Supplier)	SSE welcomes this proposal to clarify what has previously been a confusing process.	Thank you for your comments.
Anonymous (Energy Supplier)	We expect there is a duty of care for the MOA to address any safety concerns on site if visiting for the import yet noting any risk on the export, which does not appear to be explicitly covered by this proposed recovery of basic services so we would require additional clarity on expectations.	This is in scope of I0312 - Review of export meter work arrangements.
Good Energy (Energy Supplier)	n/a	n/a