RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0207 IMPORT / EXPORT MOA CHARGING CLARIFICATION

On 14 November 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed revised solution 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.

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RESPONSE TYPE	**NON-CONFIDENTIAL**
DATE ISSUED	04/03/2026
RESPONSIBLE COMMITTEE	Metering Expert Panel
LEAD ANALYST	Holly Law

DATE IMPACT ASSESSMENT ISSUED	14/11/2025
RESPONSE DEADLINE	05/12/2025

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Whilst we agree with the proposed solution, we feel it is important to draw out the consumer impacts. If a consumer requires metering works, they would not be able to arrange this via their export supplier and would need to be directed to the import supplier. Alternatively, export suppliers could utilise the Supplier Data Exchange Platform (SDEP) to raise the request with the import supplier. This could result in delays and increased complexity for consumers seeking timely resolution of metering issues. The need for consumers to navigate between import and export suppliers, or for suppliers to coordinate via SDEP, may lead to slower response times and increased frustration, particularly where urgent metering works are required. This could undermine the principle of protecting consumer interests, as outlined in the solution objectives. While the proposed solution addresses key market and charging concerns, it is important to recognise that the operational changes may have unintended consequences for consumers. Ensuring clear communication, streamlined processes, and robust coordination between suppliers will be essential to minimise delays and protect consumer interests.	Thanks for your comments. This CP is not seeking to address the arrangements for metering works for Import/Export meters where there is a separate Export Supplier. However, the working group has recommended that these arrangements are reviewed, and we are considering how best to take this forward as a separate issue.
Octopus Energy (Energy Supplier)	No comments	N/A

SSE Energy Supply Limited (Energy Supplier)	SSE supports the principle of ensuring export suppliers are not saddled with excessive MOA charges. However, we have concerns that the proposed solution could result in the export supplier having a MOA with minimum service by default, with the customer being left with no support for their export supply and no way of resolving the issue.	Thanks for your comments. We would like to understand in more detail why you would expect to see this behaviour. The working group has recommended more detailed review of the arrangements for requesting meter works for import/export meters and we are considering how best to take this forward as a separate issue. In relation to the Export MOA, the proposed solution would allow for the Export Supplier to agree additional services on a commercial basis with the Export MOA.
Good Energy (Energy Supplier)	Good Energy strongly supports the revised solution. In our view, this latest proposal presents a significant improvement compared to the earlier iteration. The proposed solution addresses the risks and challenges identified in the revised problem statement, whilst also addressing the key concerns listed in Ofgem's send back letter. We feel there is an appropriate balance between the minimum services Export MOAs are expected to provide post MHHS migration, along with the ability to procure additional services, should the export supplier wish to do so. We strongly support the progression of this solution, at the earliest opportunity.	Thank you for your comments.
ScottishPower Energy Retail Limited (Energy Supplier)	We welcome the proposed solution by the Code Manager. Our support is based on the principle that the MOA should not impose any additional costs on the export supplier when performing basic metering services.	Thank you for your comments.

Question 2:	Do you agree the proposed solutions address the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes, we agree that this solution mitigates the immediate risk of uncompetitive charging by MOAs given export suppliers have no choice on who is appointed.	Thank you for your comments.
Octopus Energy (Energy Supplier)	Yes	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	SSE believes that in order to obtain full support of the export measurement of the metering at site, either the customer or the export supplier will need to enter into an agreement with the appointed MOA. There is nothing in the solution to prevent the appointed MOA from offering uncompetitive charges for this agreement. This solution only allows for the provision of basic associated export MOA services, which may not be suitable for the customer's needs.	This is correct, the intention of this proposal is not to set requirements/parameters for the agreement of bi-lateral contracts. This will be for the Export Supplier and Export MOA to negotiate and agree. This proposal is seeking to address the commercial challenge associated with the solution introduced through MHHS, where an Export MOA is auto-appointed with no contract in place.
Good Energy (Energy Supplier)	Yes. We agree that the proposed solutions address the revised problem statement. With the scope very clearly defined for MHHS metering points, the proposed solution has the ability to address both parts of problem statement – i.e. accidental non-compliance and unfair/inflated costs from export MOAs.	Thank you for your comments.

ScottishPower Energy Retail Limited (Energy Supplier)	Yes, we agree that the proposed solution addresses the issue by enabling the export supplier to appoint MOAs for basic metering jobs without the need for any bilateral contracts. However, we would like to highlight that, in practice, it is typically the import supplier who initiates the majority of meter related work.	Thank you for your comments.

Question 3:	Are there any alternate solutions that would better address the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Our view is that this is a short-term solution which mitigates the commercial impact to export suppliers during MHHS migration, but that the industry should work on a longer-term solution with the MHHS arrangements that allows export suppliers to appoint an MOA of their choice. This solution will resolve the consumer impact we have raised in response to question 1.	Thank you for your comments. This is a separate problem statement that will need to be addressed as a separate change proposal.
Octopus Energy (Energy Supplier)	No	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	No.	Thank you for your comments.
Good Energy (Energy Supplier)	No	Thank you for your comments.

ScottishPower Energy Retail Limited (Energy Supplier)	We recommend establishing a working group comprising MOAs and Suppliers to review job types and responsibilities relating to export suppliers, particularly in cases involving standalone meters.	Thank you for your comments. The working group has recommended more detailed review of the arrangements for requesting meter works for Import/Export meters and we are considering how best to take this forward as a separate issue.

Question 5:	Do you consider it is reasonable to assume a MOA would have already had to consider the cost of providing the 'Basic Associated Export MOA Services' as part of its MHHS qualification and service offering?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes we agree with this statement.	Thank you for your comments.
Octopus Energy (Energy Supplier)	Yes, given the guidance has always been that export and import MPANs on the same meter should share the same MOA, the basic services outlined should be considered standard, particularly with MHHS linking the MPANs together and forcing the MOA to be the same across both meter points.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	Meter operators will know post MHHS they will be appointed as import and export MOA, so we would reasonably assume the costs for this are being factored in.	Thank you for your comments.
Good Energy (Energy Supplier)	Yes.	Thank you for your comments.

ScottishPower Energy Retail Limited (Energy Supplier)	Yes, we consider it reasonable to assume the MOAs would have considered the costs of providing these services to the Export Supplier at no cost as part of its MHHS qualification.	Thank you for your comments.

Question 7:	Do you agree that any additional costs incurred from the implementation of this Change Proposal are unlikely to result in a direct, material impact to Consumers?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	We have highlighted an impact to consumers in response to question 1. Export consumers would not be able to arrange any metering works via their export supplier; this could lead to unnecessary delays and additional complexity for consumers who require a site visit from the MOA.	Thank you for your comments. The working group has recommended more detailed review of the arrangements for requesting meter works for Import/Export meters and we are considering how best to take this forward as a separate issue.
Octopus Energy (Energy Supplier)	Yes, we agree.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	We feel there is a significant risk that the additional costs incurred by the import supplier to cover the minimum service for export suppliers will not be covered by the existing charges. These charges will be either passed on to customers or, dependent on contractual MOA/supplier	What do you believe makes up this additional cost?

	negotiations, could result in different prices for import only and import & export metering contracts.	
Good Energy (Energy Supplier)	n/a	N/A
ScottishPower Energy Retail Limited (Energy Supplier)	Please see our response to Q6.	Thank you for your comments.

Question 8:	Do you have any comments on the draft legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	We have no comments on the draft legal text.	Thank you for your comments.
Octopus Energy (Energy Supplier)	It would be helpful to have both a clear timeline for the expectations of a MOA providing the basic services (e.g. Sharing Information following Electricity Meter Works should happen within x working days) and a clear escalation pathway for if these deadlines are not being met. These are usually included in the contracts we sign so would be helpful to have included here.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	No.	N/A
Good Energy (Energy Supplier)	We are supportive of the draft text.	Thank you for your comments.
ScottishPower Energy Retail Limited	We have no comments	N/A

(Energy Supplier)		

Question 9:	Do you consider changes to your commercial agreements with Import Suppliers / MOAs will be required if this Change Proposal is implemented?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	We do not foresee any changes to our commercial agreements with MOAs as a result of the implementation of this change proposal.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	We assume we will require discussions with all our metering agents on charges.	Thank you for your comments.
Good Energy (Energy Supplier)	n/a	N/A
ScottishPower Energy Retail Limited (Energy Supplier)	We cannot adequately comment on this point at the time	N/A

Question 10:	What lead time would be required by your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Minimal lead time is required for implementation as there is no system development required, and no resourcing/training required.	Thank you for your comments.
Octopus Energy (Energy Supplier)	We do not believe we would require time to implement this solution as a supplier due to the fact that the entire Metering Service appointment process is automated in MHHS meaning we would not have an additional work burden from a supplier or tech perspective.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	If there are no real additional charges from the MOA, then there will be no impact, but if negotiations lead to an impact on pricing, we would require three months from approval.	Thank you for your comments.
Good Energy (Energy Supplier)	Good Energy supports implementation at the earliest possible opportunity, respecting the interactions with key MHHS project timelines.	Thank you for your comments.
ScottishPower Energy Retail Limited (Energy Supplier)	We'd recommend six months following further discussion by the working group so industry can properly assess the impact of these changes from both the perspective of the MOA and Suppliers.	Thank you for your comments.

Question 11:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	This change proposal mitigates a significant risk of unfair and uncompetitive charges from appointed export MOAs where there is no bilateral agreement in place.	Thank you for your comments.
Octopus Energy (Energy Supplier)	Yes, being able to more consistently and accurately receive meter details and other basic MOA support from export MOAs which we do not have a contract with would allow us to settle these sites easier and quicker.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	As a non SEG supplier this change will offer no tangible benefits to our business. For non-SEG export supplies, we expect that the customer would have a direct MOA contract for the supply. This proposed solution could adversely affect the import supplier's decision on whether to appoint the customer's preferred service provider.	Thank you for your comments.
ScottishPower Energy Retail Limited (Energy Supplier)	This would ease the process for Export Suppliers to resolve the issue of MOA appointments without the additional constraint of having bilateral contracts for each MOA.	Thank you for your comments.