RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0216 REC CHANGES TO TIE IN WITH DCP419

On 11 July 2025 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0216 REC Changes to tie in with DCP419.

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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LEAD ANALYST	Caroline Freimuller

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Question 1:	Do you have any comments on the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
E.ON Next (Energy Supplier)	E.ON is supportive of the recommendation to reject this solution and that the RIG is instead amended to provide flexibility for the Networks in dealing with power outage alerts. However, should the proposed solution go ahead, we are disappointed that the Api/API option has been descoped as we believe this was the more flexible option of the two and was the preferred option for MEMS and suppliers. Based on the information available at impact assessment we were not expecting to send the pre-notification for Comms hub swap outs, but the amended legal text is now clear that this will be required. We agree that same-day appointments should be out of scope of the solution	Thank you for your comments. Most comments at Party impact assessment from Energy Suppliers/MEMs that preferred the API solution came with a heavy caveat they preferred neither solution, and did not support this Change Proposal at all. They only preferred the API solution if one had to be implemented. The Code Manager felt there was not enough support for a solution that would have involved a lengthy tender and Service Provider impact assessment process to get ROM costs, to then recommend rejection.
ENGIE (Energy Supplier)	In the previous consultation, of the two options provided, we preferred the API option. As this has now been descoped and the only option available is a new data flow, we no longer support this change as we do not believe there is a cost/benefit case for that solution.	Thank you for your comments. Most comments at Party impact assessment from Energy Suppliers/MEMs that preferred the API solution came with a heavy caveat they preferred neither solution, and did not support this Change Proposal at all. They

		only preferred the API solution if one had to be implemented. The Code Manager felt there was not enough support for a solution that would have involved a lengthy tender and Service Provider impact assessment process to get ROM costs, to then recommend rejection.
British Gas (Energy Supplier)	The new market message could be further simplified by removing group BBB and making group AAA two data items MPAN Code and Customer Agreed Appointment Details. We also do not see the value of including additional information. It is not clear to us why the is required and to what purpose it would be used for.	Thank you for your comments. The Code Manager has simplified the Market Message drafted by the DCUSA Working Group, removing a group CCC (Customer Cancelled Appointment) and removing Appointment Type from Group BBB. This previous version can be seen in the minutes for DCP419 Working Group 11. We have decided to leave additional information in as it is an optional field. The Change Team have checked with REC Technical Services, and it is standard for MPAN Core and Customer Agreed Appointment Details to be two separate groups. We would always look to align with any existing group/collection that already appear, so we do not have numerous groups with the same/similar names and different Data Items included. This also means groups can be

		changed as a whole when they are used across various Market Messages. Additionally, Parties will have built their systems around group collections so by introducing new data items within an existing group collection, it will likely result in more work.
EDF Energy (Energy Supplier)	As per our response to previous consultations on this REC change, we do not support the implementation of any solution that requires pre notification of de-energisations. Any solution would be extremely costly to suppliers with no defined benefit; and the benefits to DNOs have not been substantiated. There has also been no clear confirmation that the introduction of the market flow will help to meet the obligation that DNOs have regarding AD1 alerts. Even with the flow being sent it is likely that DNOs still have to take action and therefore extra cost will have been incurred unnecessarily. We agree that this change should be rejected.	Thank you for your comments. Unfortunately the Code Manager cannot mandate the use of this Market Message in a particular way, as it is proposed to help DNOs manage an Ofgem RIG obligation rather than a REC obligation.
Scottish Power Energy Networks (Distribution Network Operator)	SPEN's preference is to makes use of the current industry standard communications tool between all DCUSA parties, the Data Transfer Network. SPEN understands that this would be fairly cost effective to deliver on and would also be faster to implement.	Thank you for your comments. The Code Manager would like to note that this solution impacts Parties who are not DCUSA parties.

IMServ (Metering Equipment Manager)	With MHHS fast approaching, introducing new market messages is challenging, it's a task which should not take priority over existing and essential MHHS work already in the pipeline. Also the idea that we implement a solution which excludes all site visits booked on the same day feels incomplete and could devalue the change to the point it's not worth perusing. Observationally, estimates of 5% to 35% for same day bookings may not be accurate depending on the situation. For example if a MEM is required to Powercycle 50 CHFs to fix comms issues then they might choose to book 50 appointments and schedule in advance, but if a MEM is required to upgrade >10k CHFs from 2G to 4G they may choose to make all jobs flexible so work is automatically scheduled to drop into Technicians calendars for 'same day' appointments.	Thank you for your comments. The estimate was generated using feedback at Party impact assessment, which is all the Code Manager is able to base this on.
Anonymous Metering Equipment Manager	In our response to I0216 we outlined our preference for option 2, the APP AND/OR API. This preference still stands if this Change Proposal is to be approved.	Thank you for your comments. Most comments at Party impact assessment from Energy Suppliers/MEMs that preferred the API solution came with a heavy caveat they preferred neither solution, and did not support this Change Proposal at all. They only preferred the API solution if one had to be implemented. The Code Manager felt there was not enough support for a solution that would have involved a lengthy tender and Service Provider impact assessment process to get ROM costs, to then recommend rejection.

		If the Change Proposal is not rejected by Ofgem, the Code Manager would only be able to consider other solution options if they issued a Send Back rather than an approval of the Data Flow solution.
Northern Powergrid (Distribution Network Operator)	No	Thank you for your confirmation.
BUUK (Distribution Network Operator)	We support the proposed solution. This has been an issue that has been part of industry discussion for a substantial amount of time and requires progress.	Thank you for your comments.
Alt Han Co (Crowded Meter Room Co-ordinator)	Alt HAN Co provided its comments to the Party Impact Assessment in March 2025, in which we noted that we don't have a strict preference for any option as we function on behalf of Energy Suppliers and it would be for them to determine their views on the proposed solution. Additionally, the obligation to notify under the proposed solution would be met by our appointed CMR MEMs on behalf of Alt HAN Co. One of our CMR MEMs expressed a preference for the API alternative solution and believed relying on the Data Transfer Network would not allow for real-time notification either on the day or on job scheduling and it would add additional steps and costs to their current processes. We proposed an alternative solution specific to CMR activities, utilising the CMR Frontier system. DNOs could be given access to Frontier and they could view upcoming planned jobs and MPANs that would be de-energised, helping them to plan and manage their obligations. This solution is specific to CMR related de-energisations and could be implemented in a future release of the Frontier system.	Thank you for your comments. The Code Manager is happy for DNOs to liaise on a case by case/contractual basis with the CMRC for access to this system if they feel it would be beneficial, but we do not think it would be appropriate to mandate this via an industry Code.

SSE Energy Supply (Energy Supplier)	SSE Energy Supply Limited does not support the proposed solution for Energy Suppliers and MEMs to send the market message to the DNOs ahead of a power down. The reasons include: • The additional costs to both suppliers and MEMs to carry out the proposed solution will exceed the savings to the DNOs, resulting in additional costs to customers. • Suppliers can request site work by their MEM agents, but are often unaware of the date and time of any power outage, as this is agreed between the MEM and the customer. • DNOs will receive many market messages for site works that do not take place, either from customer site visits that are consequently cancelled, or suppliers adopting a better safe than sorry approach when the date is not confirmed. • The majority of customers do not require DNO contact when their site is powered down. If a customer is off power they should contact their DNO for an explanation. DNO customer contact on result of a power outage message should be restricted to PSR customers.	Thank you for your comments. On the last point only, it is currently an obligation for DNOs to contact all Consumers where a Power Outage Alert is received under the Ofgem Reporting Instructions and Guidance (RIG) Annex F. "Single premises power outage alerts originating from a smart meter are not reasonably expected to indicate no supply. Where an outage alert is received, the DNO should contact the customer as soon as reasonably practicable thereafter to check whether the customer is without power, but only between 8am and 9pm." If any Party believes this obligation should be amended, they will need to contact Ofgem through the RIG consultation process.
National Grid Electricity Distribution (Distribution Network Operator)	We are pleased to see that the proposed solution involving the introduction of an online application and/or API to send notifications has been descoped. It is our view that as the market message is currently the only approved way for inter-party messages, it would seem logical that this is the only solution that should be considered for implementation.	Thank you for your comments. Although the API solution has not been pursued at this time, the Code Manager would like to note the DTN is not the only approved way for inter-party messages. There is also the DIP, various APIs already in existence (e.g. EES) and the Secure Data Exchange Platform.

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**
E.ON Next (Energy Supplier)	Yes, E.ON considers that with the vast differences in costs and benefit ranges reported from those that responded to the IA that the code manager has made a sensible and fair assessment of the costs and benefits and come to a logical and reasonable conclusion.	Thank you for your comments.
ENGIE (Energy Supplier)	Yes.	Thank you for your comments.
British Gas (Energy Supplier)	We note that in our response to the to the Party impact assessment we indicated that costs for implementation exceeded £100,000 but this does not seem to be reflected in the analysis. (“Energy Suppliers ranged between £10,000 and £100,000 per respondent”) Overall we do not believe that this change will provide good value for consumers given the overall industry costs of implementation and the uncertain benefits that may be achieved.	Thank you for your comments. The Change Report will be adjusted to reflect the response of more than £100,000, but the maths for the estimate of costs will remain the same using £100,000 as the upper limit.
EDF Energy (Energy Supplier)	Yes. This is the first time we have been provided with a clear cost analysis from the DNOs and this highlights that this change would only benefit them to a limited extent. Suppliers do not only carry out scheduled appointments with customers that could be pre-notified, and therefore	Thank you for your comments.

	the cost savings that are being put forward by the DNOs are never likely to be achieved.	
Scottish Power Energy Networks (Distribution Network Operator)	We recognise the assessment that the code manager has made and it seems reasonable	Thank you for your comments.
IMServ (Metering Equipment Manager)	The costs feel logical, but the 'benefits' to the DNOs are not clear i.e. a cost saving range between £9,000 and £1.6 million annually is not very helpful!	Thank you for your comments. The Code Manager acknowledges this is a very large range, but this is the best that could be calculated using the information provided at Party impact assessment.
Anonymous Metering Equipment Manager	Yes, we agree with the Code Manager's assessment of the costs and benefits for this change.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	We can only comment on anticipated costs of NPg – which were shared in the impact assessment. It is not appropriate to comment on costs of others – particularly since they are so wide-ranging. We agree with the summary of the benefits.	Thank you for your comments.
BUUK (Distribution Network Operator)	Yes, we agree with this assessment.	Thank you for your comments.
Alt Han Co (Crowded Meter Room Co-ordinator)	We note the business case assessment undertaken by REC is based on the broad range of impacts including intangible costs and benefits and the impact to all parties cited through the progression of the change and DCP419.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	n/a	n/a

National Grid Electricity Distribution (Distribution Network Operator)	There is a vast range between the minimum estimated industry cost and maximum estimated industry cost which makes it very difficult to assess whether this is an accurate representation. However, we are unable to comprehend how the implementation of this change would cost industry anywhere near the maximum estimated cost. In order to make a true judgment on the estimated costs, we would need to see more of a breakdown of cost expectations. Under the 'Benefits' heading (paragraph 13.2), it has been calculated that DNO regions would save between £9,000 and £1.6 million annually, based on an average of data provided by just five Energy Suppliers and MEMs. We would suggest that this estimate could increase if more Suppliers/MEMs were to contribute data to be used for this calculation. In addition to this, it is not stated when these planned visits took place so it should be noted that the estimate would increase as the Smart Meter Rollout progresses.	Thank you for your comments. The Code Manager acknowledges this is a very large range, but this is the best that could be calculated using the information provided at Party impact assessment. The non-confidential and anonymous responses can be found here if Parties wish to review them. The Code Manager would like to note these savings were calculated using the responses from seven Energy Suppliers, five MEMs and six DNOs. All questions requesting data from Parties requested data from the previous 12 months, so this data should be from 2024.

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 the recommendation of the REC Metering Expert Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
E.ON Next (Energy Supplier)	Yes this change proposal should be sent to the authority for a decision. Ofgem has previously given indications of its position on this issue but we need a formal determination on the matter.	Thank you for your comments.
ENGIE (Energy Supplier)	Yes.	Thank you for your comments.
British Gas (Energy Supplier)	We agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to determination by the Authority following the recommendation of the REC Metering Expert Panel.	Thank you for your comments.
EDF Energy (Energy Supplier)	Yes	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	SPEN are supportive of the change path.	Thank you for your comments.
IMServ (Metering Equipment Manager)	Yes we agree	Thank you for your comments.
Anonymous Metering Equipment Manager	Yes	Thank you for your comments.

Northern Powergrid (Distribution Network Operator)	Yes. It is clear from the impact assessment that most suppliers are not in favour of the change. DNOs are generally in favour so the decision will need to be made by the Authority.	Thank you for your comments.
BUUK (Distribution Network Operator)	Yes, we agree with this approach.	Thank you for your comments.
Alt Han Co (Crowded Meter Room Co-ordinator)	Yes, we agree with the determination path outlined by REC in the consultation.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes, as any changes that have the potential to result in increased costs to customers should be determined by the Authority.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree.	Thank you for your comments.

Question 4:	Do you agree with the Code Manager's recommendation that this Change Proposal should be rejected? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
E.ON Next (Energy Supplier)	Yes we agree with the recommendation that this change proposal should be rejected on the grounds that it does not better facilities REC objectives, and the benefits are minimal to customers, whereas the costs are significant and would be borne by parties who do not benefit either.	Thank you for your comments.
ENGIE (Energy Supplier)	Yes.	Thank you for your comments.
British Gas (Energy Supplier)	We agree with the Code Manager's recommendation that this Change Proposal should be rejected.	Thank you for your comments.
EDF Energy (Energy Supplier)	Yes. We strongly support this change being rejected based on the fact that it does not benefit anyone other than DNOs. It also does not help to better achieve any of the REC objectives. If this change was to be implemented it would be a significant waste of money and effort for no benefit to either industry parties or consumers.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	SPEN are supportive of this change proposal in principle, and although the cost benefit analysis is high across various market participants, we are of the view that this change supports the customer benefits and the	Thank you for your comments.

	industry requirements. We are however appreciative that based on the impact assessment that if there are a large percentage of 'on the day' appointments then the introduction of this functionality would have reduced benefits at this point.	
IMServ (Metering Equipment Manager)	We agree with the REC Metering Expert Panel that this change should be rejected, the solution doesn't appear to adequately resolve the issue, and given MHHS the timing it adds risk and expense for what appears to be unclear benefit to DNOs, certainly there is no benefit for the MEMs.	Thank you for your comments.
Anonymous Metering Equipment Manager	Yes, we agree that the Change Proposal should be rejected.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No. As stated in Q3, we think this change should be progressed to Authority decision.	Thank you for your comments.
BUUK (Distribution Network Operator)	No, we do not agree and believe this Change Proposal should be implemented. This issue requires a resolution, and it is disappointing that the assessment in the Proposal isn't taking into account alternatives and instead infers the issue is closed. Without this Change Proposal risks further reputational damage to industry, highlighting to Consumers the lack of communication between parties and wasted resources on outages that haven't occurred.	Thank you for your comments. No alternatives have been raised by Parties to this Change Proposal to the REC. Alternatives were discussed and discounted as part of the DCUSA Working Groups. The Code Manager did investigate the use of an API as an alternate solution but did not continue this past Party impact assessment due to lack of support from Parties. If there are any other alternatives Parties would like to explore, the Code Manager

		welcomes them submitting a new Issue or discussing at the REC Issues Group. The Code Manager has considered the Consumer detriment from this Change Proposal not being implemented, but does not believe this is a high enough detriment to offset the costs of implementation to Parties when there is a potential alternative solution (amending the Ofgem RIGs) with no costs associated. There have only been anecdotal discussions of Consumer detriment – no evidence (e.g. numbers of complaints DNOs have received directly related to these contacts) have been provided to the REC at impact assessment or consultation. The Change Report has been updated to specify the benefit in a reduction in reputational damage.
Alt Han Co (Crowded Meter Room Co-ordinator)	Alt HAN and the CMR service are delivered on behalf of Suppliers and it would be for them to determine their views on the proposed solution. We would make the necessary changes should the change be approved.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes, we agree that this change proposal should be rejected.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We do not agree with the Code Manager's recommendation that this Change Proposal should be rejected; in fact, we strongly believe that it	Thank you for your comments.

	should be approved. The DNO should be informed when work is taking place on Smart Meter sites within their area as this would allow them to cease unnecessary calls to consumers in response to AD1 alerts. Without the proposed prior warning, DNOs will have no indication of planned works on their networks and could be causing unintentional alarm by reaching out to consumers when they are off supply, at a time when consumers may (reasonably) expect all parties to be aware of the planned outage. It has been stated that many Energy Suppliers do not plan on booking appointments in advance of Comms Hub replacements and therefore it would not be possible for a Market Message to be sent. With the consumer's best interests in mind, there are a number of reasons why we believe this should be reconsidered and a few of these reasons are as follows: • We are sure that consumers will always prefer advanced notice of a visit. This allows consumers to expect the visit, which in turn allows them to be sure of the operative's identity upon arrival. • The cost of aborted visits when access cannot be gained must be significant. • If visits are planned in advance, this would allow for a more efficient schedule of works meaning more CH replacements can be completed in a shorter period of time. • If it is possible to pre-warn consumers of a potential power supply interruption, every effort should be made to do so. There are many important reasons for this but as an example, many people now work from home and an unexpected power supply interruption could cause significant inconvenience, even if it is brief.	The Comms Hub replacement rollout is not a REC requirement, and not within the remit of the Code Manager to stipulate how this is managed. This work will be covered under the SEC, with Energy Suppliers having relevant commercial contracts in place as they see fit. A Comms Hub replacement will not generate a true power outage, so the Code Manager does not believe the fourth point is applicable. It will generate a Power Outage Alert due to the communications being interrupted. The Code Manager has not come to this recommendation on the basis of costs alone. The REC is a Consumer code, and all recommendations take Consumer benefit and detriment into account. In this instance, the Code Manager does not believe the Consumer detriment of receiving an unnecessary contact is high enough to justify the cost to industry, especially when a potential alternate solution has been identified by the Code Manager outside of the REC which could cost industry nothing to implement. The Code Manager is unable to reach out to Ofgem to progress adjusting the DNO

	There are many related reasons why DNOs should not be making unnecessary contact with consumers but just to provide one example: In the event of a planned outage, consumers would likely expect Suppliers to have informed the Network Operator of a possible outage, and may become confused by a telephone call suggesting otherwise. Consumers may even become frustrated by contact being made for such a reason. It is important to clarify that our reasons for believing this Change should be implemented are not solely based on the costs that DNOs are likely to save. We are also of the opinion that the consumer should have advanced warning of the visit and possible power supply interruption for the reasons stated above. As stated in the Change Report, the REC is a Consumer facing Code and Consumer benefits are at the heart of many REC Change Proposals, therefore we believe that the recommendation to reject this Change Proposal should be reconsidered based on the reasons we have stated.	obligation held within the RIG, but hopes a Party chooses to do so, so that this Consumer detriment can be resolved.

Question 5:	Duplicate of question 4 included in error.

Question 6:	Do you agree with the proposed implementation approach (Big Bang) if this Change Proposal were approved? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
E.ON Next (Energy Supplier)	Yes we agree	Thank you for your comments.
ENGIE (Energy Supplier)	Yes, although we do not agree with the proposal.	Thank you for your comments.
British Gas (Energy Supplier)	We do not agree with the proposed implementation approach. The number of systems requiring amendment within our IT infrastructure is significant and as indicated in our response we anticipate we would need a longer period than 6 months to make the required changes. If this proposal is approved we would prefer a phased implementation over a period of 12 to 18 months to enable us to make the required changes.	Thank you for your comments. The implementation approach is Big Bang (everything goes into one release) or Phased (split across multiple releases). This answer has been considered under proposed implementation date.
EDF Energy (Energy Supplier)	Yes.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	SPEN would be supportive of the implementation approach.	Thank you for your comments.
IMServ (Metering Equipment Manager)	Yes – if approved it would be big bang	Thank you for your comments.

Anonymous Metering Equipment Manager	We do not believe that this Change Proposal should be approved, if it were to be approved, then we agree with the Big Bang approach.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
BUUK (Distribution Network Operator)	Yes, we agree with this approach.	Thank you for your comments.
Alt Han Co (Crowded Meter Room Co-ordinator)	If this Change Proposal was approved, we agree the implementation approach is the right one to follow.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes, we agree. Whilst we do not agree that the change proposal should be approved, but if it is, then it should be implemented with a big bang approach.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree with the proposed implementation approach. Once the new market message is released, it should be put into use immediately.	Thank you for your comments.

Question 7:	Do you agree with the proposed implementation date of 26 February 2026, if this Change Proposal were approved? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
E.ON Next (Energy Supplier)	We believe that February 2026 should be the earliest date this can be implemented	Thank you for your comments.
ENGIE (Energy Supplier)	No. This is not sufficient lead time for what would be a significant change to processes.	Thank you for your comments.
British Gas (Energy Supplier)	We do not agree with the proposed implementation date of 26th February 2026. We have a number of different systems across our entire IT infrastructure that schedule jobs that would be impacted by this change. We also use third party agents who would need to implement the change to become compliant. We are dealing with a number of differing parties, whilst running a metering procurement exercise and also preparing for Market Wide Half Hourly settlement. Third parties tend to utilise the same key personnel to do all work and their time is likely to be limited. Many other respondents also indicated that they required a minimum of 6 months from Authority approval to make the necessary changes. It is unlikely that an Authority decision will be made before 26th August	Thank you for your comments.

	2025 therefore we believe the earliest that this change should be implemented should be the June 2026 REC release.	
EDF Energy (Energy Supplier)	This change should not be implemented, however if it is we would require a minimum of six months from the date of approval to implement the required changes to systems and processes.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	SPEN would be supportive of this implementation date if the proposal were to be approved.	Thank you for your comments.
IMServ (Metering Equipment Manager)	No, as stated previously, this change likely won't make to the top of existing software development priority lists. All work which ensures the successful delivery of MHHS must take priority over this change.	Thank you for your comments.
Anonymous Metering Equipment Manager	We do not believe that this Change Proposal should be approved, if it were to be approved, then we agree with the implementation date of 26/02/2026 or 6 months post approval date.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
BUUK (Distribution Network Operator)	Yes, we agree with this proposal, if a sooner proposed implementation date is not possible. We welcome this issue being resolved.	Thank you for your comments.
Alt Han Co (Crowded Meter Room Co-ordinator)	One of our CMR MEMs noted a lead time of approximately 6 months, hence if the Change Proposal was to be approved in September as described in the consultation, then February 2026 would roughly be the right implementation date.	Thank you for your comments.

SSE Energy Supply (Energy Supplier)	SSE will require at least 6 months to implement this change from the date of its approval. As this change requires Authority approval, we would propose a June 2026 implementation as the earliest date.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we believe implementation should take place as soon as is practicably possible, especially given the upcoming Comms Hub replacements which are due.	Thank you for your comments.

Question 8:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
E.ON Next (Energy Supplier)	n/a	n/a
ENGIE (Energy Supplier)	No.	n/a
British Gas (Energy Supplier)	We strongly support the Code Manager's opinion that the Authority should amend the RIG to provide more clarity on the DNO obligation as per final Change Report below: "The Code Manager is of the opinion the RIG could be amended to provide more clarity on the DNO obligation. For example, this could state that the DNO should contact the customer as soon as reasonably practicable where a power outage alert is received, and a power outage restoration alert is not received within 30 minutes, where the customer is not on Priority Services Register. This would come at no cost to any industry Party as the RIGs go through an annual consultation, review and update process. This process typically runs from January to March, with the new RIGs being applicable from April, so the earliest this could be implemented would be April 2026."	Thank you for your comments.
EDF Energy (Energy Supplier)	No	n/a

Scottish Power Energy Networks (Distribution Network Operator)	While we appreciate that the REC are not supportive if this proposal as it currently stands, SPEN are of the view that a long-term solution to this would be beneficial.	Thank you for your comments.
IMServ (Metering Equipment Manager)	The DNO responses suggest the new data might be used differently depending on the organisation, if standardised notification flows are introduced, should the industry have a standardised process's which covers what all DNOs do with the information? We think there's a risk that implementing this change will result in a very large volume of flows containing customer appointment details being send to the DNOs, which are then not utilised for any significant or useful process. If we are going to invest heavily in a new market message we need to be confident that all DNO will use the data, and we need to be sure its adding value.	Thank you for your comments. Unfortunately the Code Manager cannot mandate the use of this Market Message in a particular way, as it is proposed to help DNOs manage an Ofgem RIG obligation rather than a REC obligation.
Anonymous Metering Equipment Manager	No	n/a
Northern Powergrid (Distribution Network Operator)	No	n/a
BUUK (Distribution Network Operator)	We would still like to see a resolution for the issue of same day appointments not being in scope of this change. We would also have encouraged wider engagement issued to ensure the right responses as part of this Proposal.	Thank you for your comments. The Code Manager reached out to DCUSA, the Energy Networks Association (ENA), the Association of Meter Operators (AMO) and Energy UK to ensure this consultation was widely publicised. The REC Operational Account Managers (OAMs) were also utilised

		to contact impacted Party types. This was on top of the usual engagement via the weekly REC Change Bulletin. We are happy to accept feedback regarding how else we could have communicated with industry for future Change Proposals. The Code Manager ensured that MEMs and SIPs were reached out to as they had not been included as part of the DCUSA Working Groups.
Alt Han Co (Crowded Meter Room Co-ordinator)	No further comments.	n/a
SSE Energy Supply (Energy Supplier)	We fully support the change to the RIG for DNOs to only contact customers on the PSR on a Smart Meter notification of a power outage.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	The suggestion to amend the RIG is one that could possibly be explored further; however, we would be concerned about how potentially waiting for 30 minutes before contacting the consumer upon receipt of an AD1 alert would affect CML data/reporting, and whether an amendment would contradict any relevant GSOPs.	Thank you for your comments. This should be discussed directly with Ofgem if any Party chooses to contact them regarding amending the RIG obligation.