RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0235 MISSING SCENARIO VARIANTS IN D0179

R0235A MISSING SCENARIO VARIANTS IN D0179ALERNATE SOLUTION

On 22 May 2025 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0235 Missing Scenario Variants in D0179 and R0235A Missing Scenario Variants in D0179 Alternate Solution.

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	18 June 2025
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Caroline Freimuller

DATE CONSULTATION ISSUED	22 May 2025
RESPONSE DEADLINE	16 June 2025

Question 1:	Do you have a preference between the R0235 and R0235A solution? Please explain why and provide any comments you have on the solutions.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Our preference would be for the R0235A solution. As per our response to the Impact Assessment for I/R0235, we do not agree that the proposed solution for R0235 addresses the problem statement. We have no records of ever having sent or received a D0179, and as we understand this to also be the case for other parties, we believe it would more appropriate for the obligation to send a D0179 on traditional Prepayment Meters to be removed and instead allow a D0139 to be used in all scenarios.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Our preference would be R0235A, to remove D0179 from Schedule 14 Metering Operations and the use of the D0139 in all scenarios. As a DNO we do not receive requests to amend energisation via D0134 on Domestic Prepayment sites and therefore do not currently utilise the D0179 data flow to advise on a de-energise or energise. We also do not require D0179 updates from the MEM to advise PP meter changes. In the main, the energisation changes requests we receive are for non-domestic sites with Current Transformer metering is in situ, where only DNO operatives can perform the change needed.	Thank you for your comments.

Scottish Power Energy Networks (Distribution Network Operator)	SPEN's preference would be for R0235A. Rationale for this is that the use of the D0179 flow was removed under the MRA previously, there are low volumes of prepayment meters being removed (as a DNO we would seldom remove a prepayment meter, the only scenario where this is appropriate would be in a safety issue). There has been very limited utilisation of this flow, and under MHHS this will be replaced by the IF-007 flow	Thank you for your comments. In the current MHHS arrangements, the D0179 is not replaced by the IF-007, only the D0139 is replaced by the IF-007. The requirements are to send both the IF-007 and D0179 for traditional Prepayment Meters.

Question 2:	How many D0139s have you sent or received in the past 12 months for a traditional Prepayment Meter?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Unfortunately we are currently unable to provide an accurate figure to answer this question due to the resourcing it would take to do so (our standard reporting does not log this level of detail). Should this information prove to be vital going forward, we will of course obtain and provide the data if required.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	None.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	We are unable to provide this information from the flow level data that we retain. This is the same issue that the code manager encountered when requesting this information from the DTN. We have reviewed the process with internal staff who are responsible for the sending of change of energisation flows and across the business the feedback has been that we do not retain this level of information, we would however expect the volumes to be low as we would not as a rule de-energise meters on domestic properties.	Thank you for your comments.

Question 3:	For Energy Suppliers: Do you foresee any impacts to your business in receiving the D0139 on traditional Prepayment Meters, rather than the D0179?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	N/A to DNOs	N/A
Northern Powergrid (Distribution Network Operator)	N/A	N/A
Scottish Power Energy Networks (Distribution Network Operator)	N/A	N/A

Question 4:	Do you agree with the Code Manager's assessment of the costs and benefits for this change? In particular, do you foresee large costs to your business if the R0235A solution were implemented rather than the R0235 solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We agree that minimal costs will be incurred if the proposed solution for R0235A was to be implemented. This is because our systems are already configured to send and receive the D0139 Market Message.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	We agree and do not foresee any cost impacts due to the implementation of R0235A.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Implementation of R0235A would be significantly less costly for us to implement than R0235. We see no benefit in introducing changes to implement a flow that was previously deemed obsolete, and will be replaced with MHHS roll out,	Thank you for your comments.

Question 5:	Do you agree with the proposed implementation approach (Big Bang)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree with the proposed 'Big Bang' implementation approach.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes	Thank you for your comments.

Question 6:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the REC Change Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree that this Change Proposal should be subject to Self-Governance approval by the REC Change Panel.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes	Thank you for your comments.

Question 7:	Do you agree with the Code Manager's recommendation, that R0235 should be rejected and R0235A should be approved? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree that R0235 should be rejected and R0235A be approved, for the reasons stated in our answer to Q1.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes	Thank you for your comments.

Question 8:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 27 February 2026?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree, although the proposed solution for R0235A could happen sooner in our opinion as it would only look to align the legal text with a process that already appears to be taking place, therefore would require minimal system changes (if any).	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes	Thank you for your comments.

Question 9:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No further comments.	N/A
Northern Powergrid (Distribution Network Operator)	No.	N/A
Scottish Power Energy Networks (Distribution Network Operator)	No comments	N/A