RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0242 - MISSING SCENARIO VARIANT FROM R0043

On 20 March 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for R0242.

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	24 April 2025
RESPONSIBLE COMMITTEE	REC Technical Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	20 March 2025
RESPONSE DEADLINE	11 April 2025

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Alt HAN Company (Other – Alt HAN Co)	The change seems to address the oversight when R0043 was originally implemented.	Thank you for your comments.
IMServ (Crowded Meter Room MEM)	Happy with the change, and implementation of a flow solution.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We are happy that the proposed solution adequately addresses the problem statement and we are supportive of this change.	Thank you for your comments.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Whilst we have no issues with the proposed solution, SSE feel that there is still a gap in the process. MEM's are the only agents that can send the D0139 to all parties and as the solution stands, there is no route to getting the D0139 to the MEM. We would require either a requirement on the DNO to update the MEM on receipt of the D0139 from the CMRM or a variant of the flow from CMRM to MEM.	Thank you for your comments. This cannot be looked at under the scope of R0242, which is limited to adding in items to the Data Specification that are present in the legal text already. The Code Manager encourages SSE to raise this as a separate Issue so it can be investigated.

Question 2:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Alt HAN Company (Other – Alt HAN Co)	Yes	Thank you for your comments.
IMServ (Crowded Meter Room MEM)	Yes agreed.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes. We agree that adding the missing Scenario Variant to the Data Specification for the D0139/MM00036 allows CMRMs to send all the Market Messages required of them in Schedule 14 so appropriately addresses the problem statement.	Thank you for your comments.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Yes	Thank you for your comments.

Question 3:	Do you think we have identified and considered all processes and scenarios that may be impacted through the implementation of the proposed change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Alt HAN Company (Other – Alt HAN Co)	Yes	Thank you for your comments.
IMServ (Crowded Meter Room MEM)	Yes	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Thank you for your comments.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No – as there is no obligation on DNO's to inform the MEM of the energisation status.	Thank you for your comments. This cannot be looked at under the scope of R0242, which is limited to adding in items to the Data Specification that are present in the legal text already. The Code Manager encourages SSE to raise this as a separate Issue so it can be investigated.

Question 4:	Do you believe the solution appropriately accounts for the industry's move to the new MHHS arrangements?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Alt HAN Company (Other – Alt HAN Co)	N/A	n/a
IMServ (Crowded Meter Room MEM)	Yes	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes. As stated within the Change Proposal, this change will have no impact on the MHHs Design or Code Drafting. There is indirect impact on the MHHS Data Specification but this is only related to the updates required to add Scenario Variants to the D0139/MM00036.	Thank you for your comments.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No, as the MEM is required to update Registration via the IF/007 it is imperative that the MEM is informed of the energisation change	Thank you for your comments. This cannot be looked at under the scope of R0242, which is limited to adding in items to the Data Specification that are present in the legal text already. The Code Manager encourages SSE to raise this as a separate Issue so it can be investigated.

Question 5:	Do you have any comments on the proposed updates to the market message?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Alt HAN Company (Other – Alt HAN Co)	None	Thank you for your comments.
IMServ (Crowded Meter Room MEM)	No.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	No comments.	Thank you for your comments.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No	Thank you for your comments.

Question 6:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Alt HAN Company (Other – Alt HAN Co)	The change should not impact as the variant should have been available in the original implementation.	Thank you for your comments.
IMServ (Crowded Meter Room MEM)	1 to 2 months for testing with the new role code it must be sent under.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We believe our systems are already set up in a way which makes us as a DNO capable of receiving the proposed data flow including the new SV, however a lead time of approximately 6 - 9 months would be required to ensure adequate processes and update documentation/LWIs, etc.	Thank you for your comments.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	As a supplier this has no direct impact on us.	Thank you for your comments.

Question 7:	Do you foresee any risks to your MHHS implementation, qualification or migration plans caused by the delivery of this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Alt HAN Company (Other – Alt HAN Co)	N/A	n/a
IMServ (Crowded Meter Room MEM)	No risks, but MHHS would take priority in development.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Please refer to question 4.	Thank you for your comments.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	No	Thank you for your comments.

Question 8:	Would implementing the proposed solution incur any costs to your business? If so, please provide details breaking down design/build/test costs and on-going costs. If preferable, please indicate which of the below ranges your costs may fall: A) Nil; B) Up to £9,999; C) Between £10,000 and £49,999; D) Between £50,000 and £99,999; or E) more than £100,000.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Alt HAN Company (Other – Alt HAN Co)	Nill	Thank you for your comments.
IMServ (Crowded Meter Room MEM)	B	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	B) Up to £9,999	Thank you for your comments.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Nil	Thank you for your comments.

Question 9:	Do you identify any benefits to your business through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Alt HAN Company (Other – Alt HAN Co)	Yes AHC will be able to ensure the CMR MEMs can issues all the variants for this flow.	Thank you for your comments.
IMServ (Crowded Meter Room MEM)	Yes, as it fulfils the REC Code obligations for a Crowded Meter Room MEM	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We are unlikely to see any additional benefits as our registration systems are updated with the energisation status of an MPAN via a D0205 from the Supplier. Currently, we would not use a D0139 from the CMRM for this purpose.	Thank you for your comments.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	We have identified no benefits, as it stands	Thank you for your comments.

Question 10:	Taking into consideration both the costs and the benefits seen by your organisation, do you consider this change should be made?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Alt HAN Company (Other – Alt HAN Co)	Yes	Thank you for your comments.
IMServ (Crowded Meter Room MEM)	Yes	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Although we would not see any direct benefits if this change was to be implemented, we would be supportive of this change as it would allow CMRMs to send all the Market Messages required of them in Schedule 14, thus upholding their obligations under the REC.	Thank you for your comments.
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	Yes, this change should be made, but it needs to be a cross-code change with DCUSA to add the obligation on the DNO to send the D0139 to the MEM or add a CMRM to MEM flow.	Thank you for your comments. This cannot be looked at under the scope of R0242, which is limited to adding in items to the Data Specification that are present in the legal text already. The Code Manager encourages SSE to raise this as a separate Issue so it can be investigated.

Question 11:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Alt HAN Company (Other – Alt HAN Co)	None	n/a
IMServ (Crowded Meter Room MEM)	No	n/a
National Grid Electricity Distribution (Distribution Network Operator)	No further comments.	n/a
SSE Energy Supply Ltd (SSE Business Energy) (Energy Supplier)	SSE feel that a real time notification of energisation status as per I0216, would be more of an effective solution. A D0139 for a short-term de-energisation is too slow. The IF/007 dip file would be a good option for the CMRM to update the MEM.	Thank you for your comments.