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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0244 C21 TO BE INTRODUCED INTO STIRG DOCUMENT

On 09 May 2025 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0244 C21 to be introduced into STIRG Document.

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	1.0
RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	20 June 2025
RESPONSIBLE COMMITTEE	Metering Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE CONSULTATION ISSUED	09 May 2025
RESPONSE DEADLINE	02 June 2025

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree with the proposed solution.	Thank you for your comments.
OVO Energy (Energy Supplier)	Yes	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE agree with the proposed solution.	Thank you for your comments.
British Gas (Energy Supplier)	Agree with the solution that C21 will benefit both Suppliers and DNOs.	Thank you for your comments.
Scottish and Southern Electricity Networks (Distribution Network Operator)	Yes, SSEN agree with the proposed solution.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.

Question 2:	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 that the proposed Big Bang approach is suitable for the implementation of this Change Proposal.	Thank you for your comments.
OVO Energy (Energy Supplier)	The approach is agreeable however the planned implementation date seems excessively far away, and due to this would not have much impact to the RTS removal plan.	Thank you for your comments. Please see the Code Manager comments on question 5 regarding the proposed implementation date.
SSE Energy Supply (Energy Supplier)	Yes	Thank you for your comments.
British Gas (Energy Supplier)	The implementation approach needs to take into account the time required to develop internal guidance and the dissemination to the Field to ensure full compliance from the implementation date agreed.	Thank you for your comments. The Code Manager believes the six month gap between August 2025 voting (as set out in the Proposal Plan) and February 2026 release is large enough for these activities to take place.
Scottish and Southern Electricity Networks (Distribution Network Operator)	SSEN agree with the Big Bang implementation approach.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.

Question 3:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree.	Thank you for your comments.
OVO Energy (Energy Supplier)	Yes, we agree with benefits however the change will have little impact on the RTS removal project due to the increased implementation date.	Thank you for your comments. Please see the Code Manager comments on question 5 regarding the proposed implementation date.
SSE Energy Supply (Energy Supplier)	SSE agree the costs for this change should be minimal and the benefits should materialise.	Thank you for your comments.
British Gas (Energy Supplier)	Yes	Thank you for your comments.
Scottish and Southern Electricity Networks (Distribution Network Operator)	SSEN agree with the assessment of costs for this change.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.

Question 4:	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 Metering Expert Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree that it is appropriate for this Change Proposal to be subject to Self-Governed approval by the Metering Expert Panel.	Thank you for your comments.
OVO Energy (Energy Supplier)	Yes.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes	Thank you for your comments.
British Gas (Energy Supplier)	Yes	Thank you for your comments.
Scottish and Southern Electricity Networks (Distribution Network Operator)	SSEN agree with this approach.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes.	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 on 27 February 2026? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Taking into consideration the system changes, subsequent testing and policy updates potentially required by this change for NGED, we would require a minimum of 6 months to implement the proposed solution. Therefore, providing the final determination takes place in July/August as planned, implementation in February 2026 should be fine. Should the final determination be delayed for any reason, this could have a negative impact on our readiness to implement the change by the end of February 2026 therefore we would expect the implementation date to also be delayed in this event.	Thank you for your comments. The current Change Proposal Plan has this change being voted on by no later than the August MEP meeting (13 August 2025). If this changes, a re-baseline would need to be submitted to the REC Change Panel and the Code Manager would review any impacts this would have, including proposed implementation date.
OVO Energy (Energy Supplier)	We believe the proposed implementation date is unnecessarily far away, considering the minimal impact it would take to implement, e.g. the STIRG doc update is ready, and the D0135 flow already exists, so would just be a case of adding an additional code to the existing list. This change request was raised in hope that it would assist with the RTS removal programme but due to the implementation date it will have minimal impact on the project. Please note there was a call arranged by REC to discuss the proposed C21 code in July 2023.	Thank you for your comments. The majority of Parties who responded to the Party impact assessment and to this consultation have confirmed they would require six months between final approval and implementation due to system testing and training of operatives. As such, February 2026 is the earliest standard release the Code Manager can propose the implementation of this Change Proposal. The Code Manager has documented in Section 11 the Change Report (For

		Consultation) that this change will have minimal impact on the RTS removal program due to its proposed implementation date, but does believe it will improve efficiency of the on-going Smart Meter roll out program. The inclusion of the new C21 Code was discussed in July 2023 at the Electricity Operational Metering Forum. The minutes (available here) confirm an action was taken away by the Energy Networks Association to run a separate session to review the changes in more depth and that a Change Proposal would be raised after this. No Change Proposal was raised to the Code Manager for this prior to R0244.
SSE Energy Supply (Energy Supplier)	As this will require a minor change to our system, we are happy with the implementation date 27th Feb 2026	Thank you for your comments.
British Gas (Energy Supplier)	Yes. The final guidance wording needs to be issued as soon as approved so all parties can ensure a timely cascade ton the Field before the implementation date.	Thank you for your comments. While the approved legal text will not be incorporated into the STIR document prior to implementation in February 2026, it will be available on the Change Proposal Page for Parties to download and use prior to implementation.
Scottish and Southern Electricity Networks (Distribution Network Operator)	We would like to understand why the change could not be implemented sooner, as we feel the introduction of this Category C code will greatly	Thank you for your comments.

	reduce the need to report as many B07 codes, which in turn will help assist with the RTS replacement programme. Apologies if the reason has been stated elsewhere. If that is the earliest it can be introduced, we support this of course.	The majority of Parties who responded to the Party impact assessment and to this consultation have confirmed they would require six months between final approval and implementation due to system testing and training of operatives. As such, February 2026 is the earliest standard release the Code Manager can propose the implementation of this Change Proposal.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.

Question 6:	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
OVO Energy (Energy Supplier)	N/A	n/a
SSE Energy Supply (Energy Supplier)	No	n/a
British Gas (Energy Supplier)	The proposal is centred on the new C21 code and its wording. The original proposal also added wording to B07 so it must be confirmed that this has also been taken into account as part of the proposal or it will not be evident that C21 is to be used in preference to B07. **B07 extract**	Thank you for your comments. The Code Manager has revised the legal text to provide a more comprehensive integration of C21 into the STIR document. The version that went for impact assessment and consultation was as provided by the Proposer and MEP. The Change Team has received no other feedback on the STIR under this change, or from the MEP as the responsible owner of the document. As the scope of this change is limited to the introduction of C21, the Change team would recommend you reach out to either the Supplier Representative on the MEP or to the

	• The PME connection arrangement is non-standard as shown in Scenario 1 below. Where the meter neutral tail between cut-out and connector block does not need to be replaced, you do not need to report as Code B07 but continue with your work and report as Code C21.  To ensure the next version is correct in all ways reference should also be given to feedback that has been made to REC on numerous occasions where it has been identified by a number of parties there were "other" inaccuracies in the document – have these been addressed?	REC Committees team (committees@recmanager.co.uk) with your proposed amendments to have these added to the agenda. Once approved by the MEP, the Change team can then raise a Category 3 Change Proposal and implement any approved changes. This will also likely be faster than waiting for a February 2026 release, as Category 3 Change Proposals can be implemented much faster than Category 1 and 2 proposals – which R0244 is, due to it's amendment of the Data Specification.
Scottish and Southern Electricity Networks (Distribution Network Operator)	No.	n/a
Northern Powergrid (Distribution Network Operator)	N/A	n/a