RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0266 REC DATA SPECIFICATION CLARIFICATIONS

On 23 January 2026 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0266 REC Data Specification Clarifications.

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	V1.0
RESPONSE TYPE	Non-confidential
DATE ISSUED	10 March 2026
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Caroline Freimuller

DATE CONSULTATION ISSUED	23 January 2026
RESPONSE DEADLINE	27 February 2026

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 removal of Annex C from the REC Portal, replacing it with amendments to relevant Data Specification (as per the Solution Document), updates to Schedules 14 and 30 and a new Category 2 Document titled “Rules for the Completion of Electricity Market Messages”.	Thank you for your comments.
SMS (Metering Equipment Manager)	Yes, we agree with the proposed solution, the data within Annex C is useful and moving to retain this information would be beneficial.	Thank you for your comments.
Xoserve (Central Data Service Provider)	In principle we support the proposed solution.	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 with the proposed implementation approach.	Thank you for your comments.
SMS (Metering Equipment Manager)	Yes, we see no reason why it would need to be broken down into stages.	Thank you for your comments.
Xoserve (Central Data Service Provider)	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 that the benefits of increased clarity and reduced ambiguity should outweigh any costs incurred by parties (which we are expecting to be minimal, if any).	Thank you for your comments.
SMS (Metering Equipment Manager)	Yes, we agree the clarity and cohesion would be beneficial and that there would be no costs to ourselves as no changes to systems required.	Thank you for your comments.
Xoserve (Central Data Service Provider)	There is anticipated to be no costs associated with this change. The change seeking to reinstate Code that was omitted as part of the transition to REC. On this basis the processes are not anticipated to be impacted but REC Schedules updated to capture in more detail.	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 REC Change Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Thank you for your comments.
SMS (Metering Equipment Manager)	Yes, happy for it to be self-governed.	Thank you for your comments.
Xoserve (Central Data Service Provider)	We agree that the change should not be subject to authority consent.	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 06 November 2026? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree with the proposed implementation date.	Thank you for your comments.
SMS (Metering Equipment Manager)	Yes, no issues with the implementation in November.	Thank you for your comments.
Xoserve (Central Data Service Provider)	We have raised some observations regarding the change solution. If these changes are agreed, we have no objections to the change being implemented in November.	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
SMS (Metering Equipment Manager)	No further comments.	n/a
Xoserve (Central Data Service Provider)	Further clarity on the Address Population Rules as it is unclear as to which flows this document is intended to apply. The term 'Metering Point Address' is not a defined REC term, but it is assumed that it is the Address of the Metering Point. The Metering Point is a defined term in the REC that we assume is exclusively related to a meaning given to it in the Electricity Distribution Licence, it appears this may not be appropriate for use in a gas context. Given the references to SAF and Unmetered Supplies, our understanding is that this Schedule may not be intended to apply to Gas. It may be more effective for the intended guidance to be incorporated within the relevant Operational Guidance for the applicable flows. As part of the review, we have noted that paragraph 2.17 includes a reference to paragraph 19.8 but it is assumed that this was a migration issue from the previous drafting [in the MRA].	Thank you for your comments. The Code Manager has removed the Address Population Rules from the scope of this Change Proposal, and instead added the intended notes across various Data Items. The Market Sector Code Data Item Rule has been updated to reflect the difference between CSS and non-CSS sites. Additional clarity has been added to the Register Type Code Data Item Rule with the text "for a single asset". The Code Manager believes this covers all three points raised against this Data Item. The Code Manager has left the text against Meter Link Code unchanged, as it specifies any updates must be discussed with the

	Some of the data item rule changes defined for the ONJOB may not be correct and may require review as outlined below: - Market Sector Code – CDSP T73 request can only be used for non-CSS sites. Suppliers should update the market indicator via CSS. - The REC Defined Term is Converter, please could you arrange to amend references to 'convertor' - Register Type Code – the notes may be misleading as both converted and unconverted registers would be provided for a converter. Assume contextually this is correct regarding where this appears within the flow relating to an instance that an asset is being reported against (but would not be true of the message in the instance of a converter exchange where we would expect to get both registers for the removed and installed converter). - Register Type Code - These could be provided for any measuring assets present at the event being reported – does any conditionality related to this need to be included as well as 'mandatory for installed assets only'. NB: there is a further level of complexity that is not contemplated in the document related to the Data Update Code. - Register Type Code – The notes might need to be refined as would need additional contextual layer to describe that Assets can be provided in the context of installed / removed / reported. But in the case of an exchange there would be an install instance AND a removal instance. Appreciate that at the point that Register Type Code is specified additional context will have been provided in the preceding datasets.	CDSP and so the CDSP can then inform the Party of the correct actions to take. Reading Data Set and Meter Serial Number have no text within Annex B specifying these are mandatory for removed as well as installed assets, so the Code Manager has deemed this outside the scope of this Change Proposal. If this is a change that needs to be made, the Code Manager would request a new Change Proposal is raised so it can be appropriately impact assessed (as this Change Proposal is currently near to final vote, there is not time to do so adequately under R0266). The Code Manager has not made the update suggested for Units of Measure for the same reasoning. The Code Manager has not expanded out any rules that are relevant to the CDSP Scenario Variants to Suppliers, Shippers and MAMs, as these Parties may have other contractual arrangements other than these Market Messages to share this information between themselves. 027 Name has been updated to remove the comma and add a period, to make it clearer these are two separate items. The Code Manager is not sure that "Identifies Asset Provider" is against the correct group here,

	- Meter Link Code – the CDSP does not allow updates to this data item via these flows whereas the notes infer that these may be allowed. - Reading Data Set (007) – this is expected to be mandatory for installed, removed and reported measuring assets. - Serial Number – for Removed Asset this would be mandatory for any flows to the CDSP and equally would expect that this would define any downstream flows so statement should be 'Mandatory for installed and removed Asset'. - Notes that state that the flows to CDSP (SV40015; SV40018; SV40021) this can only be fulfilled if all flows contain this data, therefore should be provided by MAMs to Suppliers to Shippers. - 'Units of Measure' – Must be provided for a Converter Asset, but in the event that the Units of Measure of the installed Meter and Converter are not aligned, the Units of Measure will be derived based upon the Meter Asset' asset. - 027 Name – it is unclear whether the two statements related to the MAP and Requestor are linked I would assume not and as a result would suggest that these are recorded as separate points. - 028 Address. We would suggest that the address guidance provided in the Address Population Notes is added here. - 028 Address. The notes state: "Please reference Address Population Rules." Is this the existing text in the notes, or should this be marked as a change? NOTE: observations that I have made on the document not being changed by this document: - Flows SV40015; 18 and 21 are not RECCo flows, these are governed by Xoserve as the CDSP under the UKLM in the UNC.	as it is against 008 Market Participant in some Scenario Variants – this has been passed to REC Technical Services to investigate if another Change Proposal is required to correct that. The "Please reference Address Population Rules." against 028 Address group is existing text, it is not a change being made by this Change Proposal. Scenario Variants SV40015, SV40018 and SV40021 are owned by the REC (as are all 15 Scenario Variants of the ONJOB), confirmed in the EMDS. A new Change Proposal can be raised proposing a change of owner if required. The text against 022 Meter and 005 Converter is already in the EMDS, and so not within the scope of this Change Proposal to amend. If these need to be reviewed, a new Change Proposal needs to be raised. Thank you for confirming there are no changes required to UKLink from this Change Proposal. Annex B no longer exists and has never been held on the REC Portal, so there is no way for the Code Manager to promote visibility of this document. R0266 is intended as a review

	- 022 Meter dataset – text at group level 'if Meter at Metering Point' might infer that this would be mandated for any reported or removed assets – and this would not be correct. - 005 – Converter. As above. No changes to the UKLink file formats used by Shippers to update asset data are anticipated to be carried out by the CDSP as a result of this change. We have reviewed this document reflecting that these flows have many contexts in which they could be sent and received, therefore we don't expect that any of our comments are intended to change existing functionality nor can we say that they are exhaustive for each context that could occur. Annex B was designed to provide greater contextual insights to the originators of the flows, so we would suggest that we promote the visibility of this document and a review by originators and recipients of these flows. We acknowledge that this is a large piece of work and beyond the scope of R0266 and look forward to working with the Code Manager in the future to undertake this activity.	of Annex B to determine what needed to be back into the REC and there are no plans by the Code Manager at this time to conduct another review after R0266. We would require a party to raise a Change Proposal and sponsor such a review if they believed one was required.