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01	Proposal Plan
02	Impact Assessment
03	**Consultation**
04	Final Recommendation

CHANGE REPORT

R0268 CONSEQUENTIAL CROSS-CODE CHANGE FOR BSC P441 - COMPLEX SITE CLASSES CREATION

DOCUMENT VERSION	V0.1
PROPOSED IMPLEMENTATION DATE	25 June 2026 if Authority decision received by 25 May 2026; or 05 November 2026 if Authority decision received by 05 October 2026.
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Metering Expert Panel	**CHANGE PATH**	Authority Determined
PRIORITY STATUS	High	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Electricity Suppliers, MOAs, DNOs		

LEAD ANALYST (SOLUTION LEAD)	SUBJECT MATTER EXPERT
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OVERVIEW

The Balancing and Settlement Code (BSC) modification P441 is looking to introduce Complex Site classes which would categorise the types of Complex Site with each having clearly defined criteria within the BSC whilst also facilitating a new "type" of Complex Site (referred to as a Class 6 Complex Site) to allow approval of "non-standard" Complex Sites. It will also clarify when the netting of Imports from Exports for multiple Metering Systems registered in Supplier Volume Allocation (SVA) is permitted.

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CODE MANAGER MINDED TO POSITION

The Code Manager recommends that the REC Metering Expert Panel recommend that the Authority:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 25 June 2026 if Authority decision received by 25 May 2026 or 05 November 2026 if Authority decision received by 05 October 2026.

RETAIL ENERGY CODE

CONTENTS

Code Manager Minded To Position 2
1 Summary 4
2 Problem Statement 4
3 Impacts 4
4 Cross-Code Impacts 4
5 Proposal plan 5
6 Priority Status and Urgency 5
7 Summary of Analysis Undertaken 6
8 Proposed Solution 6
9 Draft Legal Text 6
10 Summary of Impact Assessment Activity 7
11 Risks, Assumptions, Issues and Dependencies 7
12 Business Case Assessment 7
13 Case for Change 8
14 Appendix 10
15 Glossary 10

BACKGROUND

1 SUMMARY

BSC modification P441 was raised in August 2022 following a recommendation of the BSC Issue 88 Workgroup (which looked to introduce Complex Site classes) and during the initial consideration of the proposal it became clear that there would need to be complementary changes to the Retail Energy Code (REC) and to the Distribution Connection Use of System Agreement (DCUSA).

This Change Proposal and DCUSA change proposal DCP424 are consequential changes needed to support P441. The BSC believes that Complex Sites have great potential to help develop new arrangements to help drive a smart network, achieve a zero-carbon Energy system, and that by introducing Complex Site classes it will allow the approval of new types of Complex Sites and will clarify the netting of Imports from Exports for multiple Metering Systems.

The REC will need to reflect these new Complex Site classes, and this Change Proposal will facilitate this by introducing requirements into Schedule 14 – Metering Operations.

2 PROBLEM STATEMENT

The introduction of new Complex Site classes is needed into the REC to facilitate the solutions under BSC P441 and DCP 424.

3 IMPACTS

CONSUMERS
Electricity Consumers with Complex Sites

REC PARTIES AND SERVICE USERS
Electricity Suppliers
MOAs
DNOs

REC DOCUMENTS / PRODUCTS
Schedule 14 – Metering Operations

MHHS
There are no impacts to MHHS from this Change Proposal.

4 CROSS-CODE IMPACTS

This is a cross-code change with BSC modification P441 and DCUSA change proposal DCP424.

The BSC is the lead code for these changes, as determined by the Cross Code Steering Group (CCSG).

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**13 Aug 25**	**23 Oct 25**
	Solution Development	August	October
Change Proposal		**24 Oct 25**	**13 Jan 26**
	Business Case Assessment	October	October
	Consultation	October	November
	Final Determination	November	January
Voting		**14 Jan 26**	**14 Jan 26**
	Issue to Authority for determination	15 Jan 26	15 Jan 26

This plan has been developed alongside the BSC and DCUSA to ensure all three modifications are aligned in going for consultation and for final decision.

No impact assessment is proposed as one was conducted under previous REC Change R0133 Consequential Cross-Code Change for BSC P441 - Complex Site Classes Creation.

6 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	2	27	53
	Retail Markets Impact	Innovation and Market Arrangements	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	7	7
		Legal and Regulatory Compliance	1	14	14
Resource	Complexity / Effort / Duration		1	9	9
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		1		8
Urgency *(The need to progress a change to meet a targeted date)*		Cross Code Activity	3	10	30
				Overall Priority Score (rounded)	163

Priority Status	HIGH
Change Proposal Type	STANDARD

RETAIL ENERGY CODE

SOLUTION

7 SUMMARY OF ANALYSIS UNDERTAKEN

The overall solution was developed by the working group under BSC modification P441.

The working group met between 31 August 2022 and 11 June 2025 with 12 sessions, the notes of which are available on the BSC website (link above).

8 PROPOSED SOLUTION

The REC solution proposes changes to Schedule 14 – Metering Operations clause 2.27, and Appendix 2.

The proposed changes to clause 2.27 are:

When the MOA sends Meter Technical Details and identifies a Complex Site, they shall also provide all required information, via the Complex Site Supplementary Information Form, including the Complex Site class (detailed below), to each recipient of the Meter Technical Details, to enable collection of data from the Metering Asset.

Complex Site Classes

- *Classes 1 and 2 – Licensed Exempt Distribution Network*
- *Classes 3 and 4 – Feed through sites and network flows impacting Settlement Meters*
- *Class 5 – Netting of Imports from Exports across multiple Boundary Points over the Total System*
- *Class 6 – Non-standard Complex site*

Appendix 2 has also been amended to add Complex Site class to the Complex Site Supplementary Information Form.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0268 can be found here.

RETAIL ENERGY CODE

PRELIMINARY ASSESSMENT

10 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

10.1 SERVICE PROVIDER IMPACT ASSESSMENTS

No Service Provider impact assessment was required as part of this Change Proposal.

10.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was not conducted as part of this Change Proposal.

One was conducted under previous REC Change R0133 Consequential Cross-Code Change for BSC P441 - Complex Site Classes Creation. The non-confidential responses to that impact assessment are published here.

11 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

11.1 RISKS AND ISSUES

There are no risks or issues identified with this Change Proposal.

11.2 ASSUMPTIONS AND DEPENDENCIES

NO.	DEPENDENCY	NOTES	STATUS
D01.R0268	This is a cross-code change where the BSC are the lead code. Implementation of this Change Proposal is dependent on approval of BSC P441.	The REC, DCUSA and BSC are working collaboratively and monitoring this through CCSG. The plans for these Change Proposals have been aligned so that the Authority receive all three for determination as close together as possible.	Open.

There are no assumptions identified with this Change Proposal.

12 BUSINESS CASE ASSESSMENT

12.1 COSTS

There are no central systems costs associated with this Change Proposal. Impacts to Parties under the REC are expected to be minimal.

Impacts to Parties under the BSC and DCUSA and the costs expected under these codes will be captured in their respective reports.

12.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
MOVE TOWARDS NET ZERO	Complex Sites have great potential to help develop new arrangements to help drive a smart network and achieve a zero-carbon energy system; however, there needs to be further clarity to the arrangements to provide confidence they are set up to be settled and billed correctly.
LOCAL ENERGY SCHEME ENABLEMENT	As Local Energy Schemes are predicted to become more popular (which rely on the allowance of netting Imports from Exports across the Total System), it is essential that the rules for when netting should be permitted are clearly defined going forwards. This change facilitates arrangements to help achieve this objective.
ALIGNMENT ACROSS INDUSTRY CODES	This is an enabling change within a wider set of industry changes to fully deliver the introduction of Complex Site classes within the BSC and DCUSA.

12.3 COST BENEFIT ANALYSIS

As there are no costs identified and three intangible benefits, the Code Manager believes there is a positive case for change for the implementation of this Change Proposal.

Furthers costs and benefits are laid out in the respective reports from BSC and DCUSA.

13 CASE FOR CHANGE

The Code Manager believes that R0268 better facilitates the following REC Objectives:

OBJECTIVE	IMPACT TYPE	DESCRIPTION AND JUSTIFICATION
To ensure the REC operates and evolves in a manner that facilitates the achievement of its mission statement[1]	Positive	The REC mission statement is to "facilitate the efficient and effective running of the retail energy market, including its systems and processes through promoting innovation, competition, and delivering positive customer outcomes". The Code Manager believes this Change Proposal positively impacts this objective as the introduction of Complex Site

[1] REC Mission Statement

		class adds clarity and ultimately leads to positive Consumer outcomes (captured below).
To ensure customers interests and data is protected in the operation of the REC	Positive	The introduction of Complex Site class should allow for greater clarity when setting up Local Energy Schemes (which rely on the allowance of netting Imports from Exports across the Total System). This will benefit Consumers and be a facilitator towards net zero goals.
To drive continuous improvements and efficiencies in the operation of the REC and the central systems and communication infrastructures it governs	Positive	The Code Manager believes this Change Proposal positively impacts this objective as the introduction of Complex Site class adds clarity to the Complex Site process.

Further points to consider are detailed in the respective reports from BSC and DCUSA.

14 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
RELATED CHANGE(S)	BSC - P441 Creation of Complex Site Classes DCUSA – DCP424 Use of System charging for Complex Sites Previously withdrawn REC Change - R0133 Consequential Cross-Code Change for BSC P441 - Complex Site Classes Creation

15 GLOSSARY

TERM	DEFINITION
Balancing and Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
Complex Site	means any site that requires a 'Complex Site Supplementary Information Form' to be sent by the Meter Operator Agent to enable Supplier Agents to interpret the Meter Technical Details and calculate consumption data for Settlement purposes.
Complex Site Supplementary Information Form	means the form set out in Appendix 2 of the Metering Operations Schedule that is sent in addition to the meter Technical Details for a Complex Site.
Cross Code Steering Group (CCSG)	means the group of that name described in Paragraph 3 of the Change Management Schedule.
Distribution Connection and Use of System Agreement (DCUSA)	means the agreement of that name maintained pursuant to the Electricity Distribution Licences.
Export	means electricity which is exported from a Premises.
Import	means electricity which is imported to a Premises.