RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

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

On 24 October 2025 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0268 Consequential Cross-Code Change for BSC P441 - Complex Site Classes Creation.

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	19 November 2025
RESPONSIBLE COMMITTEE	Metering Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE CONSULTATION ISSUED	24 October 2025
RESPONSE DEADLINE	14 November 2025

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Energy Local CIC (Local Energy Market Developer)	Yes.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes, SPEN are supportive of this change	Thank you for your comments.
EON / Npower Business Solutions (Energy Supplier)	No, we don't agree We do not believe that P441 is workable under MHHS arrangements and is unnecessarily complex. The same objective could be achieved via amendments to P442. That aside, the solution as proposed In R0268 places an obligation on the MOA to include the complex meter class in the CSSIF. Under MHHS, we do not perceive how an MOA would be able to identify a complex site . The receipt of a D0268 is the only place it can be identified via data item J1687 Complex Site Indicator which the Smart date service (SDS) does not receive, so would not be able to identify This then begs the question on a COA or indeed CoS As it stands: • D0268s for Advanced has a complex site indicator – fine in Advanced segment only.	Thank you for your comments. These will be passed back to the BSC as the lead code for their review.

	• D0149/D0150s do not – not workable for Trad in the Smart Segment. • IF/PUB 005/006 files - no equivalent Complex site indicators in there (or in the DiP catalogue) – not workable in for Smart meters. P441 does not account for the fact that under MHHS the market is segmented by Advanced/Smart and MOAs need to be operating in the same segment	
SSE Energy Supply (Energy Supplier)	SSE supports the proposed solution.	Thank you for your comments.
Stark Connect (Metering Equipment Manager)	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**
Energy Local CIC (Local Energy Market Developer)	Yes.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes	Thank you for your comments.
EON / Npower Business Solutions (Energy Supplier)	If R0268 is implemented, a big bang approach would be sensible and should apply to all CSSIF sent after the implementation date	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes, SSE views the proposed implementation approach as the only viable option.	Thank you for your comments.
Stark Connect (Metering Equipment Manager)	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**
Energy Local CIC (Local Energy Market Developer)	Yes.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	SPEN are in agreement that the relevant costs for this change will be more pertinent to the other code areas associated with this change.	Thank you for your comments.
EON / Npower Business Solutions (Energy Supplier)	We agree that for this change specifically the costs would likely be minimal for the solution as proposed but as we have outlined, we do not believe that MOA would be able to identify a complex site as per our answer to Q1. Whilst we agree with the benefits described we do not believe the solution as proposed would improve these.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE agrees there are no costs to this change, and expects the benefits listed will be realised.	Thank you for your comments.
Stark Connect (Metering Equipment Manager)	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 determination by the Authority following approval by the Metering Expert Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Energy Local CIC (Local Energy Market Developer)	Yes.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes	Thank you for your comments.
EON / Npower Business Solutions (Energy Supplier)	Yes, we agree	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	As this change is a cross-code change with two other code changes under the BSC and DCUSA, SSE feels this change should be determined by the authority alongside the two other proposed changes.	Thank you for your comments.
Stark Connect (Metering Equipment Manager)	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 25 June 2026 if Authority decision received by 25 May 2026; or 05 November 2026 if Authority decision received by 05 October 2026.? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Energy Local CIC (Local Energy Market Developer)	Yes.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	We are supportive of the dates being aligned across the implementation of all of the change proposals relating to this issue, our preference would be for the implementation date to be in line with the November date, as there are areas of consequential change in one of the other proposals that we feel has not been adequately addressed	Thank you for your comments. This will be fed back to the BSC as the lead code for these changes for their consideration. The REC will align with the BSC release.
EON / Npower Business Solutions (Energy Supplier)	The proximity of the proposed implementation pf P441 (and the consequential changes under REC DCUSA) to MHHS full go live in October 2026 whilst it remains unknown as to how this solution would work under MHHS, means this modification in its current baseline has a very limited shelf life. If P441 is implemented, R0268 and DCP424 should be implemented at the same time.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	R0268, itself, will have minimal impact on SSE's systems and processes, and so we are happy with the recommended dates. However, as this change is part of a wider cross-code change, which	Thank you for your comments.

	will likely have an impact on our systems, we will require six months to implement from the date of approval	
Stark Connect (Metering Equipment Manager)	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**
Energy Local CIC (Local Energy Market Developer)	n/a	n/a
Scottish Power Energy Networks (Distribution Network Operator)	No further comments	n/a
EON / Npower Business Solutions (Energy Supplier)	No further comments	n/a
SSE Energy Supply (Energy Supplier)	No	n/a
Stark Connect (Metering Equipment Manager)	No	n/a