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 11 September 2026 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0269 implementation date.

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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| **DOCUMENT VERSION** | V1.0 |
| **RESPONSE TYPE** | Non-Confidential |
| **DATE ISSUED** | 08/10/2026 |
| **RESPONSIBLE COMMITTEE** | Metering Expert Panel |
| **LEAD ANALYST** | Caroline Freimuller |

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| **DATE CONSULTATION ISSUED** | 11 September 2026 |
| **RESPONSE DEADLINE** | 02 October 2026 |

| Question 1: | Do you agree with the Code Manager's recommendation to amend the proposed implementation date to "the same date as P441, with a minimum of 5 Working Days between Authority decision and implementation"? | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| ENGIE<br>(Energy Supplier) | Yes, we agree that this modification should be made at the same time as P441. | Noted. Thank you for your response. |
| SP Energy Networks<br>(Distribution Network Operator) | We would support the same implementation date for this change as for the P441 BSC change.<br>However we note that there is no reference in the P441 to 'with a minimum of 5 working days between authority decision and Implementation'.<br>As far as we can see on the P441 final modification the BSC is working to the following timescales:<br>The BSC Panel recommends an Implementation Date for P441 of:<br>25 June 2026 as part of the standard June 2026 BSC Release if an Authority decision is received on or before 25 May 2026 or<br>5 November 2026 as part of the standard November 2026 BSC Release if an Authority decision is received after 25 May 2026 and before 5 October 2026.<br>We are supportive of the dates being aligned but must be clear on what these dates are. We are assuming that this has been added as a catch- | Noted. Thank you for your response. The Code Manager has liaised with the BSC change lead to confirm the wording for the new proposed implementation date for this REC Change R0268. The Code Manager has provided a copy of this response to the BSC, noting that the BSC's P441 Send Back Procedure is to be approved by SVG on 08 October 2026. However, due to R0268's proposed implementation date of 06 November 2026, the REC had to issue this second consultation ahead of the BSC's P441 Send Back Procedure approval. |

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| | all, however we believe that actual dates agreed between the Codes would be a preferred option. | |
| UK Power Networks (Distribution Network Operator) | Yes, as we understand that the BSC, DCUSA and REC changes will all need to take effect at the same time should the Authority approve, which would allow for all work to conclude on all three changes and allow the Authority the time they would require to make a decision, without the need for further send back letters. | Noted. Thank you for your response. |
| Stark (Metering Equipment Manager) | Yes | Noted. Thank you for your response. |

| **Question 2:** | Do you have any other comments relating to the implementation date of this Change Proposal? | |
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| **RESPONDENT DETAILS** | **RESPONSE** | **CODE MANAGER COMMENTS** |
| ENGIE (Energy Supplier) | No | Noted. Thank you for your response. |
| SP Energy Networks (Distribution Network Operator) | No further comments. | Noted. Thank you for your response. |
| UK Power Networks (Distribution Network Operator) | We are aware of some discussions as part of the DCUSA change which could require further work to the BSC and REC changes if they were to be progressed, which might require additional work to be incorporated into any final REC solution. | Noted. Thank you for your response. The Code Manager is engaging with our BSC and DCUSA colleagues, as well as Ofgem, to ensure alignment across the three changes, including on the proposed solution. Any |

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| | | changes to the proposed solution may require a separate, consequential REC change. |
| Stark<br>(Metering Equipment Manager) | No | Noted. Thank you for your response. |