RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0284 UPDATES TO SCHEDULE 14 MEASUREMENT TRANSFORMERS COMMISSIONING TIMESCALES

On 10 April 2026 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0284 Updates to Schedule 14 Measurement Transformers Commissioning Timescales.

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	18 May 2026
RESPONSIBLE COMMITTEE	Metering Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE CONSULTATION ISSUED	10 April 2026
RESPONSE DEADLINE	08 May 2026

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Whilst we are reluctant to see the timescales changed at all, we do understand the reasons for doing so. That said, we note that no statistics have been provided to show the percentage of commissions that exceed 80-85 WDs to demonstrate the extent of the problem, which is disappointing given the costs that we are likely to bear, should this change proposal be approved.	Thank you for your comments. The Code Manager has only been provided with the percentage of commissions that exceed the current timescales from one Party, and these were submitted confidentially so cannot be shared with the wider industry. They have however been provided to the Metering Expert Panel. If any Parties wish to submit such data now, the Code Manager would welcome this.
SSE Energy Supply (Energy Supplier)	Yes, SSE agrees with the proposed solution.	Thank you for your comments.
IMServ (Metering Equipment Manager)	Yes, agree.	Thank you for your comments.
Anonymous (Meter Asset Provider)	We do not see what the benefit of this change. The reduced timescales do not appear realistic for achieving successful meter commissioning outcomes.	Thank you for your comments. This Change Proposal is not aiming to improve commissioning success rates, but to

	The proposed changes are unlikely to improve commissioning success rates. By reducing the timescales, it is likely to lead to an increase in the number of unsuccessful attempts to commission the meter at first point. While the changes may encourage the DNO to issue the D0383 more quickly, this alone is unlikely to improve overall meter commissioning success rates. Commissioning a meter can only be achieved once there is sufficient load. For non domestic new connections and vacant properties reaching the 10% is unlikely to be achieved in the proposed timescales. The process is also affected by customer availability and access as well as DNO performance. Within the change we do not see any measures to improve either of these or have any impact on settlements performance.	help ensure that as many commissions as possible are completed before the RF window closes and incorrect Settlement data still has the opportunity to be corrected. If there are further changes to the commissioning process that would help improve performance, the Code Manager would welcome an Issue or Change Proposal being raised to investigate this – noting that there would likely be a cross-code requirement with the Balancing and Settlement Code (BSC).
Scottish Power Energy Networks (Distribution Network Operator)	We are not supportive of the proposal as currently written. We have concerns around the reduction in the timescale to send commissioning information for the Measurement Transformers (D0383) within 5 working days. A key issue in relation to this is the dependency on the customer appointing a Supplier and subsequently a MOA before the DNO can issue the D0383 data flow. While Measurement Transformers may already have been commissioned, the process cannot be completed until these appointments are in place. These sites require periodic manual checks in ECOES to identify when a MOA has been appointed, at which point the process can move forward. Further tightening of the SLA would place additional operational burden on DNO clerical teams, who would need to monitor	Thank you for your comments. Within the current timescales, if the full 16 Working Days is taken to perform commissioning, the D0383 must be sent within 5 Working Days already (21 Working Days from Energisation). It was also suggested to shorten this to 3 Working Days, which the Code Manager has not taken forward. We believe 5 Working Days is an acceptable compromise. As the MOA is ultimately accountable for the installation and commissioning of Metering Assets (REC Schedule 14, section 2.13), the

	these cases multiple times per week to avoid breaching the five-working-day requirement once a MOA is appointed. We would suggest that the wording is changed to reflect this position, that either within 5 days of the site being energised and/or the MOA being appointed.	Code Manager believes there should always be a MOA appointed before the Metering Asset is energised and this process takes place. The Code Manager also has concerns that amending the process to link the SLA for sending the D0383 to the date of MOA appointment would also create burdensome admin for DNOs, as they would have to frequently check EES for when a MOA has been appointed in order to not fail the SLA. EES also does not provide the date the MOA was actually appointed, just the effective from date which may be retrospective.
UK Power Networks (Distribution Network Operator)	Yes, however would prefer the existing SLA for sending commissioning information for the measurement transformer from Energisation rather than the new approach of linking each step in the process to the previous step. Happy with the change in 15.6.1/30.6.1 for commissioning being reduced from 16 working days to 15.	Thank you for your comments. The Code Manager has taken this approach following the feedback received at Change Issues Group, as a way to further shorten the timescales with as minimal an impact as possible. It was also suggested to shorten this to 3 Working Days, which the Code Manager has not taken forward. We believe 5 Working Days is an acceptable compromise.

Question 2:	Do you agree with the proposed implementation approach (Big Bang)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes, SSE agrees with the proposed implementation approach of a 'Big Bang'.	Thank you for your comments.
IMServ (Metering Equipment Manager)	Yes	Thank you for your comments.
Anonymous (Meter Asset Provider)	If the change was to go ahead we do support a big bang approach	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	We are supportive of a big bang approach in relation to this change should it be implemented.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	Yes, this will ensure one only process needs to be followed from the agreed date rather than having two processes running in parallel.	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**
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We agree that there will be no central system costs and that costs will be borne by affected parties. We will incur (potentially significant) costs if this change is approved, due to changes needed to our internal software/on-site apps, along with updates to policies, LWIs and field operative training. Based on current workloads.	Thank you for your comments. The Code Manager did note in the Change Report that Parties reported their costs as being in the range of £0 to £50,000, with the majority reporting towards the lower end of this spectrum.
SSE Energy Supply (Energy Supplier)	Yes, SSE agrees with the Code Manager's assessment of the costs and benefits for this change.	Thank you for your comments.
IMServ (Metering Equipment Manager)	Yes	Thank you for your comments.
Anonymous (Meter Asset Provider)	Yes we agree with the assessment of cost and benefits	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we agree that there are no central cost impacts for this, and costs will be with relevant parties.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	There will be costs to UKPN in updating internal systems, KPI reporting and training communication to staff. Also updating method statements and compliance procedures.	Thank you for your comments. The Code Manager did note in the Change Report that Parties reported their costs as

		being in the range of £0 to £50,000, with the majority reporting towards the lower end of this spectrum.

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 Metering Expert Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree that self-governance approval by the REC MEP is appropriate for this change.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes, SSE agrees with the Code Manager's assessment of the change path and that it should be subject to Self-Governance approval by the REC Metering Expert Panel.	Thank you for your comments.
IMServ (Metering Equipment Manager)	Yes	Thank you for your comments.
Anonymous (Meter Asset Provider)	We agree that it should be subject to Self-Governance approval by the REC Metering Expert Panel	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	Yes.	Thank you for your comments.
UK Power Networks (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 25 June 2027? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	Yes	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We would need to make changes to our internal software/on-site apps, along with updates to policies, LWIs and field operative training. Based on current workloads, we estimate that this could take a minimum of 6-9 months, therefore implementation in June 2027 would be acceptable.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE agrees with the Code Manager's recommendation that this change proposal should be approved for implementation on 25 June 2027.	Thank you for your comments.
IMServ (Metering Equipment Manager)	It's a short timescale, but we believe it will be ok.	Thank you for your comments.
Anonymous (Meter Asset Provider)	Yes we agree with the proposed date	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	If accepted, we believe that this is a reasonable lead time for this change.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	Yes, this allows the required time to carry out training, issue communication to the wider business and update method statements and compliance procedures	Thank you for your comments.

Question 6:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	N/A	n/a
National Grid Electricity Distribution (Distribution Network Operator)	No further comments.	n/a
SSE Energy Supply (Energy Supplier)	No other comments.	n/a
IMServ (Metering Equipment Manager)	None	n/a
Anonymous (Meter Asset Provider)	No further comments	n/a
Scottish Power Energy Networks (Distribution Network Operator)	No further comments.	n/a
UK Power Networks (Distribution Network Operator)	No	n/a