RETAIL ENERGY CODE

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

CHANGE REPORT

R0290 LEGACY DATA ITEM API SERVICE

DOCUMENT VERSION	V1.1
PROPOSED IMPLEMENTATION DATE	26 June 2026
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Change Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	Low	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Energy Suppliers, MOAs, Data Services, TPIs		

LEAD ANALYST (SOLUTION LEAD)	SUBJECT MATTER EXPERT
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OVERVIEW

Market-wide Half Hourly Settlement (MHHS) removes certain Data Items (e.g. Profile Class, Measurement Class, Standard Settlement Configuration, Time Pattern Regime etc.) that are important to wider processes and products offered to Consumers. This proposal is seeking a mechanism for electricity Market Participants to look up the previous entries for these legacy Data Items held before MHHS Migration begins.

RESPONSIBLE COMMITTEE DECISION

On **02 June 2026,** in line with the Code Manager recommendation, the REC Change Panel voted to:

- **REJECT** the proposed change solution;
- **REJECT** the proposed implementation approach; and
- **REJECT** the proposed implementation date of 26 June 2026.

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BACKGROUND

1 SUMMARY

REC Issue I0290 Legacy Data Item API Service has been raised by a Market Participant who has a number of roles, including Advanced Data Service, as they believe there is a temporary requirement for industry to continue to have the ability to access legacy Data Items that will be redundant or made optional when a Metering Point is migrated to MHHS. Examples of such Data Items include Profile Class, Measurement Class, Standard Settlement Configuration (SSC) and Time Pattern Regime (TPR). They state the Data Items are important for supporting industry processes, including offering products to Consumers.

2 PROBLEM STATEMENT

The risk of loss of certain Data Items for MHHS Migrated Metering Points may impact Parties in their ability to carry out and support industry processes, or in what products they are able to offer Consumers, in both the MHHS Market and following a Reverse Migration.

3 IMPACTS

CONSUMERS
Indirect

REC PARTIES AND SERVICE USERS
Energy Suppliers
MOAs
Data Services
TPIs

REC DOCUMENTS / PRODUCTS
Schedule 1 – Interpretations and Definitions
Schedule 9 – Qualification and Maintenance (Access Agreement)
Schedule XX – Legacy Data Item API

MHHS
While this Change Proposal does not impact MHHS, it has been generated by a need identified by a Party from changes made by MHHS.

4 CROSS-CODE IMPACTS

This Change Proposal had potential to be cross-code with the Data Transfer Services Agreement (DTSA) so was monitored via the Cross Code Steering Group (CCSG). It has since been determined this would be a direct commercial arrangement with ElectraLink, not in their role as the DTSA Administrator.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**12 Jan 26**	**29 Apr 26**
	Solution Development	January	March
	Information Request	January	February
	Service Provider Impact Assessment	March	April
	Business Case Assessment	April	April
Change Proposal		**30 Apr 26**	**01 Jun 26**
	Consultation	April	May
	Final Determination	June	June
Voting		**02 Jun 26**	**02 Jun 26**
	Appeal Window	03 Jun 26	17 Jun 26

The previous plan approved allowed until 15 May 2026 for Service Provider impact assessment and business case assessment.

The Code Manager has revised this, as for this Change Proposal to be able to make voting at the 02 June 2026 Change Panel, the consultation can open no later than 30 April 2026.

6 STAKEHOLDER ENGAGEMENT

This was discussed at the Change Issues Group meeting on 15 January 2026, with an Information Request issued on the same day. This is to allow the Code Manager to establish if there is an industry wide need for this solution, or if it specific to the Proposer.

6.1 INFORMATION REQUEST

The information request was conducted between 16 and 30 January 2026, with five responses received. These responses have not been published as the Code Manager is treating all responses as confidential. They will be provided to the Change Panel as the responsible committee to form part of the decision making process.

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7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	1	27	27
	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	0	14	0
Resource	Complexity / Effort / Duration		1	9	9
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Cross Code Activity	2	10	20
				Overall Priority Score (rounded)	96

Priority Status	LOW
Change Proposal Type	STANDARD

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SOLUTION

8 PROPOSED SOLUTION

The proposed solution would introduce an API, which REC Parties and Third Party Intermediaries (TPIs) would be able to sign up as a user of. There will be no charge to Users of this API. This API would provide the last value transferred over the Data Transfer Service (DTS) of the following Data Items for each MHHS Metering Point:

- Profile Class;
- Standard Settlement Configuration;
- Time Pattern Regime;
- Measurement Class; and
- Meter TImeswitch Code.

This API is proposed as being in place from 26 June 2026 (REC June Release) until MHHS Milestone M16 (currently 02 July 2027). This is not proposed as long term solution, as it is expected that Parties update any systems to no longer require these Data Items where they are no longer available. There is also a risk of these Data Items being incorrect, if a meter is exchanged post Migration. Alternatively, if it is determined these Data Items are required more long term, a separate new solution to reintroduce them should be explored rather than continuing to use a snapshot in time of the last held value of the Data Item (for example, the retention of the Standard Settlement Configuration is being considered under REC Issue I0273 Sharing of SSC and TPR Information for MHHS Smart and Advanced Meters).

The API itself would be provided by Electralink and require a commercial agreement between RECCo and Electralink to introduce.

To enable this API to be introduced into the REC, a new temporary REC Schedule will be introduced to set out how REC Parties and TPIs can become a Legacy Data Item API User and for what purposes the data can be used. The full drafting of the new proposed schedule is available on the REC Portal, with a link in Section 9 of this Change Report.

This would also require updates to Schedule 1 – Interpretations and Definitions for the introduction of new defined terms, and updates to the Access Agreement held within Schedule 9 – Qualification and Maintenance.

The new defined terms proposed for Schedule 1 are below:

Term	Acronym	Definition
Legacy Data Item API		means the application programming interface (API) made available under the Legacy Data Item API Schedule.
Legacy Data Item API User		means a REC Party or Non-Party REC Service User which has obtained (and retains) approval to use the

		Legacy Data Item API in accordance with the Legacy Data Item API Schedule.
Legacy Data Item API Data		means the Data Items available via the Legacy Data Item API, as described in the Legacy Data Item API Schedule.
Meter Timeswitch Code		has the meaning given to the expression in the BSC.
Profile Class		has the meaning given to the expression in the BSC.

The proposed changes to the Access Agreement add in the below clauses:

Legacy Data Item API *(Clauses 3.7 and 3.8 are to be deleted if the User is not becoming a Legacy Data Item API User)*

3.7 RECCo hereby grants the User the rights associated with being a Legacy Data Item API User subject to and in accordance with the Legacy Data Item API Schedule (which schedule shall apply on an Equivalent Basis).

3.8 The User shall be bound by and shall comply with the Legacy Data Item API Schedule in its role as a Legacy Data Item API User (which schedule shall apply on an Equivalent Basis).

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0290 can be found here:

- New Schedule – Legacy Data Item API;
- Schedule 1 – Interpretations and Definitions; and
- Schedule 9 – Qualification and Maintenance.

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PRELIMINARY ASSESSMENT

10 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

10.1 SERVICE PROVIDER IMPACT ASSESSMENTS

ELECTRALINK	• ElectraLink conducted an impact assessment for the main build of this API.
	• Their total costs were estimated as ~£467,000 to provide this API from June 2026 to July 2027.
	• This cost provides the API for the agreed period of time plus operational monitoring, incident triage and change and release governance.
	• The service requirements include:
	  ○ The service being available 24/7, with business hours operational support from ElectraLink;
	  ○ Scalability, serving 10,000 requests in times of low demand with the ability to scale to 1 million calls where required;
	  ○ Controlled API throughout and stable request handling, with response times averaging 0.2 seconds per call;
	  ○ Security measurements including authentication, access control, secure hosting, logging and oversight;
	  ○ Traceability including operational logging and audit support for troubleshooting and assurance; and
	  ○ Defined support routes, incident handling and escalation within ElectraLink.

REC TECHNICAL SERVICES	• REC Technical Services conducted an impact assessment, as they will be building a connector with the ElectraLink API that will provide the front end Users will query. • Their total costs were estimated as £30,000.
REC PROFESSIONAL SERVICES	• REC Professional Services conducted an impact assessment, due to the expected increase in the number of Data Access Requests and Access Agreements that will need to be processed. • Their total costs were estimated as being a ROM of ~£15,000 if only Users with existing Access Agreements applied to become Legacy Data Item API Users. However, if a large volume of applications were received with no current Access Agreement in place a new FTE would be required to process these, at a ROM cost of ~£80,000 per annum.

10.2 REC PARTY IMPACT ASSESSMENTS

No Party impact assessment was conducted as part of this Change Proposal, as it would not have been possible to conduct one and have this Change Proposal aim for June 2026 release. It was determined that a release any later than June 2026 would have negative consequences on the business case, as the API would be in place for less than one year.

Parties can also choose not to become a Legacy Data Item API User, so there are no non-optional impacts to Parties.

11 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

There are no risks, assumptions, issues or dependencies associated with this Change Proposal.

12 BUSINESS CASE ASSESSMENT

12.1 COSTS

	COSTS
ELECTRALINK	£467,000
REC TECHNICAL SERVICES	£30,000
REC PROFESSIONAL SERVICES	£15,000 - £80,000

These costs only cover the solution being in place until MHHS Milestone M16 (02 July 2027). If the solution were extended past this date, further costs would likely be incurred.

REC BUDGET APPROVAL SECURED FOR CENTRAL SYSTEM COSTS	20 April 2026

12.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
REC PARTIES AND TPIS CAN ACCESS THE LAST VALUE HELD FOR DATA ITEMS REMOVED BY MHHS, WHERE THESE DATA ITEMS HAVE BEEN	This Legacy Data Item API would allow REC Parties and TPIs who signed up to use it to access the last held value for the Profile Class, Standard Settlement Configuration, Time Pattern Regime, Measurement Class and Meter Timeswitch Code for MHHS Migrated MPANs.

OVERRIDEN WITH BLANKS WITHIN EES	The main use case has been suggested to be accessing the last held Profile Class and Standard Settlement Configuration in order to identify multi rate meter types and ensure the Consumer is on the correct tariff. These items are retained in the MHHS market but are only mandatory for Traditional meters, with them being optional for Smart and Advanced meter types. It was originally assumed that some Suppliers would remove these items following migration, however it has been found that they are being retained for ~96% of Migrated MHHS Metering Points. The other use cases were accessing the last held Measurement Class and Meter Timeswitch Code. These items are redundant in MHHS processes and so are not retained following a Migration. Parties were keen to access these so the correct legacy set-up could be used following a Reverse Migration. The information these items provide can arguably be derived from other data items (Market Segment, Connection Type etc.) and the use case is only valid for the Reverse Migration process which ends at MHHS Milestone M14 (28 October 2026) meaning the benefit would only be realised for four months. The final use case was around the Time Pattern Regime. This item is communicated via Non-Half Hourly Meter Technical Detail Market Messages which will only be retained for Traditional meters in MHHS. The item is less useful for Advanced and Smart where HH consumption is available. As such, this benefit is vastly reduced than originally expected. Data from 11 March 2026 showed that ~96% of MHHS Metering Points still had Profile Class and Standard Settlement Configuration populated. The use cases for these Data Items have been determined as: • Providing quotes for Consumers where these Data Items are still required within Supplier systems; • Setting up of Consumer accounts where Half Hourly data is not yet available to help validate they are on the best/correct tariff; • General portfolio and exception management that requires these Data Items; and • MHHS Reverse Migration (note: this benefit would only be in place until MHHS Milestone M14, which is planned for 28 October 2026).

12.3 COST BENEFIT ANALYSIS

The total central system cost for the implementation of this Change Proposal is between £512,000 and £577,000. This does not include any internal development costs to REC Parties or TPIs that may be required to query this API, and there would likely be further central systems costs if MHHS Milestone M16 were delayed beyond 02 July 2027 and it was determined this API needed to be in place until the new milestone date. The central system cost is a large percentage of the available 2026-27 REC Change budget, and the use case does not justify the spend.

The Code Manager has assessed the benefit from this Change Proposal as being weak, due to these Data Items only being missing from ~4% of MHHS Metering Points.

This will not stop any Parties who wish to contract separately with ElectraLink from receiving similar data or reports, but there is no case for change for funding this centrally through the REC.

13 CASE FOR CHANGE

The Code Manager does not consider there to be a positive case for change for implementing this Change Proposal on the basis that:

- The proposed solution would resolve a problem that is not impacting as many MHHS Metering Points as anticipated as the Data Items are optional rather than removed (with them being blank for ~4% rather than 100% of MHHS Metering Points);
- The proposed solution is expensive, with total central system costs expected to be £512,000 and £577,000;
- The central system cost is a large percentage of the available 2026-2027 REC Change budget (17-20% of the £3million allocated to change in the REC 2026-27 budget), and the use case does not justify the spend;
- The Code Manager has been unable to accurately establish how many Parties and TPIs would register to become a Legacy Data Item API User;
- Part of the use case (Reverse Migration) would become redundant at MHHS Milestone M14 (currently 28 October 2026);
- Any Party who wishes to receive this data can contract separately with ElectraLink to receive it; and
- The proposed solution would only be in place from 26 June 2026 to MHHS Milestone M16 (currently 02 July 2027).

14 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 29 April 2026 to obtain views on the Change Report (For Consultation). In total five responses were received from three Energy Suppliers, one Distribution Network Operator (DNO) and one Metering Equipment Manager (MEM). The key themes from these responses have been summarised and set out below. The non-confidential

responses have been published here.

14.1 SUMMARY OF RESPONSES

Overall, three respondents agreed with the Code Manager recommendation to reject this Change Proposal.

Two respondents believed this Change Proposal should be approved, with one of these respondents providing a caveat while they believed it should be approved that the costs were too high and should be challenged.

14.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

No comments were provided on the proposed legal text.

One respondent confirmed they did not agree that this API should only be in place until M16 (02 July 2027). The Code Manager has confirmed this solution has only ever been envisaged as temporary, as the MHHS Target Operating Model (TOM) is designed to exist without these Data Items and providing the last held value for a Data Item means that incorrect and out of date data could be provided, with this risk increasing as the data ages. If it is determined these Data Items are still required, it should be investigated under a different Change Proposal for a more permanent solution for these Data Items to be reintroduced and provided (for example I0273, looking at SSC and TPR).

Of the five respondents, three confirmed they would register to become Legacy Data Item API Users. One confirmed they saw no benefit for their business type (DNO) and one confirmed they already get this data from another source.

One respondent wanted to open the API further than the five Data Items currently in scope, mentioning Data Items within the D0313 and D0149 Market Messages. The Code Manager has determined this is not possible under this Change Proposal, as there would be a need to liaise with ElectraLink to see if it possible for other Data Items to be included, obtain a new quote and issue a second consultation. There would also need to be investigations into the appropriateness of providing this data, particularly from the D0313, which contains confidential security data and is only shared between appointed or incoming Parties. It is thought this would negatively impact the business case further, due to the time this would take.

14.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

Three respondents agreed with the Code Manager's assessment of the cost and benefits for this Change Proposal, with one respondent disagreeing and stating they believed the costs for implementation are reasonable for the positive Consumer outcomes they foresee.

One respondent believed the costs from ElectraLink were too high, and these should be challenged. The Code Manager has confirmed we can only issue the quote and information provided by ElectraLink. As a third party non REC governed service, the REC Code Manager has no influence over their commercial decisions or cost to operate.

Three respondents agreed with the assessment that this Change Proposal should be subject to Self-Governance review by the REC Change Panel, with two respondents not providing an answer to this question.

Three respondents agreed with the Code Manager recommendation to reject this Change Proposal. Two respondents believed this Change Proposal should be approved, with one of these respondents providing a caveat while they believed it should be approved that the costs were too high and should be challenged.

14.4 IMPLEMENTATION DATE AND APPROACH

Two respondents agreed with the proposed implementation approach of Big Bang if this Change Proposal were to be implemented. Two respondents did not provide an answer to this question, and one respondent re-iterated they believed this Change Proposal should be rejected.

Two respondents agreed with the proposed implementation date of 26 June 2026 if this Change Proposal were to be implemented, with one providing a caveat they believed this date to be unachievable given its proximity. The Code Manager did confirm with ElectraLink prior to issuing the consultation as part of on-going discussions that this date would be achievable. Two respondents did not provide an answer to this question, and one respondent re-iterated they believed this Change Proposal should be rejected.

14.5 COMMENTS RECEIVED ON CHANGE REPORT (FINAL RECOMMENDATION)

On 01 June 2026, the Code Manager received a letter on the Change Report (Final Recommendation) from the Energy Consultants Association (ECA) disagreeing with the recommendation of rejection. This letter is available here.

This letter was shared with Change Panel members and discussed in the meeting on 02 June 2026. The Change Panel agreed with the Code Manager that the contents of the letter did not provide sufficient evidence or use cases to approve the Change Proposal, that many of the items raised were outside of the scope of R0290 and would not have been resolved by the R0290 solution. The Code Manager has requested the ECA raise a new Issue to investigate their proposals.

More information on this discussion will be available in the 02 June 2026 Change Panel minutes when they are published.

15 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

A correction had been made to the case for change (section 13 of this Change Report), which previously stated “The central system cost is a large percentage of the available 2025-2026 REC Change budget”. This has been corrected to the 2026-2027 REC Change budget.

The Code Manager has added what percentage of the £3million REC Change budget this spend would represent into the case for change (section 13 of this Change Report).

16 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	New Schedule – Legacy Data Item API Schedule 1 – Interpretations and Definitions Schedule 9 – Qualification and Maintenance
CONSOLIDATED CONSULTATION RESPONSES	Link

17 GLOSSARY

TERM	DEFINITION
Data Item	means the most granular level of data defining a specific attribute in respect of a data type, the permissible values for which are defined and controlled in the Data Item Catalogue.
Market-wide Half Hourly Settlement (MHHS)	means market-wide half hourly settlement, which is being introduced pursuant to the BSC (see MHHS Implementation).
Metering Point	has the meaning given to it in the Electricity Distribution Licence, which for the time being means: "the point, determined according to the principles and guidance given in the MRA Transition Schedule to the Retail Energy Code, at which a supply of electricity taken into or conveyed from the licensee's Distribution System: (a) is or is intended to be measured; or (b) where Metering Equipment has been removed, was or was intended to be measured; or (c) in the case of an Unmetered Supply, is treated as measured."
MHHS Metering Point	means a Metering Point which has been MHHS Migrated, and which continues to operate in that state, or a Metering Point which has been established to operate within MHHS arrangements.
MHHS Migration	means the act of migrating a Metering Point in accordance with the REC MHHS Migration Schedule. "MHHS Migrated" shall be interpreted accordingly.