RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0290 LEGACY DATA ITEM API SERVICE

On 29 April 2026 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0290 Legacy Data Item API Service.

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	26 May 2026
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Caroline Freimuller

DATE CONSULTATION ISSUED	29 April 2026
RESPONSE DEADLINE	21 May 2026

Question 1:	Do you have any comments on the proposed solution, including the proposed legal text and the proposed end date of M16 (02 July 2027)?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Octopus Energy (Energy Supplier)	We support the Code Managers minded position to REJECT this solution. We do not feel that this is needed, it has a limited shelf life and the data is available through other routes. The redundant items are also already available for MHHS migrated sites on EES by default.	Thank you for your comments.
Centrica (Energy Supplier)	The legal text has not been reviewed at this time; please refer to our response to question 4 for further details.	Thank you for your confirmation.
Stark (Metering Equipment Manager)	Do not agree there should be an end date. The API should be available past the end of migration to check legacy data items.	Thank you for your comments. The Code Manager does not believe it is appropriate for this API to exist past M16, as the MHHS Target Operating Model (TOM) is designed to exist without these Data Items. Particularly, some of these items are redundant under the MHHS TOM and not used in MHHS Processes. Others are classed as optional and deemed as not required for certain meter types. These Data Items may also become out of date throughout this period, particularly if a meter is replaced or reprogrammed.

		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).
National Grid Electricity Distribution (Distribution Network Operator)	Whilst we recognise the intent to mitigate potential impacts arising from the removal of certain legacy data items under MHHS, we do not consider the proposed API to be a proportionate solution.	Thank you for your comments.
OVO Energy (Energy Supplier)	The loss of legacy data items such as SSC for MHHS Migrated Metering Points degrades Suppliers' ability to service customers. For example, understanding the read schedule set up of non-comms smart or AMR customers, knowing whether a customer receives their heat via auxiliary load. Furthermore, for customers with aux load who are in comms, we can retrieve this data remotely after the customer is live via DCC (i.e. after the Supplier Start Date). However, this will cause issues with offering the customer tariffs appropriate to their set up ahead of go live, degrading the Change of Supplier journey and experience.	Thank you for your comments. It is being 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). Further Change Proposals can be raised if there are further Data Items that need to be reviewed.

Question 2:	If this Change Proposal were implemented, would your organisation register as a Legacy Data Item API User?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Octopus Energy (Energy Supplier)	No, we already get the daily EES snapshots.	Thank you for your confirmation.
Centrica (Energy Supplier)	Yes, if the interim solution is implemented, we will register as a Legacy Data Item API User.	Thank you for your confirmation.
Stark (Metering Equipment Manager)	Yes	Thank you for your confirmation.
National Grid Electricity Distribution (Distribution Network Operator)	No, we would be unlikely to register as a Legacy Data Item API User. The primary use cases for the proposed solution sit predominantly with suppliers and data service providers, and we do not see a clear operational need for DNOs to access this data.	Thank you for your confirmation.
OVO Energy (Energy Supplier)	Yes, if this Change Proposal were implemented, OVO Energy would register as a Legacy Data Item API User	Thank you for your confirmation.

Question 3:	If yes to question 2, for what reasons would you use the Legacy Data Item API?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Octopus Energy (Energy Supplier)	n/a	n/a
Centrica (Energy Supplier)	We would use the Legacy Data Item API as a temporary measure until a long-term enduring solution is implemented. In particular, access to legacy data items (such as SSC and TPR) would support the accurate identification of multi-rate metering arrangements and enable us to ensure customers, especially those on Economy 7 tariffs, are placed on the correct product to support their heating circuits.	Thank you for your comments.
Stark (Metering Equipment Manager)	1. To identify legacy Measurement Class, Profile Class and SSC for continued segmentation and service delivery purposes. Also to support reverse migration processes. 2. Wider use to obtain D0313 data if this is currently missing for NHH AMR to support D0268 creation and migration into ADS/MSA 3. Wider use to obtain D0149 data to understand and communicate multi-register setup on migrated ADS meters to support continued register-based billing, rather than HH in case customer has opted out	Thank you for your comments. The solution only includes PC, SSC, TPR, PC and MTC. Any further Data Items within the D0313 or D0149 will not be included as part of this solution. For these to be added now, the Code Manager would need to speak with ElectraLink to see if it possible for any other Data Items to be included, obtain a new quote and issue a second consultation. We believe this would negatively impact the business case further, due to the time this would take.

National Grid Electricity Distribution (Distribution Network Operator)	NA.	n/a
OVO Energy (Energy Supplier)	To enable the provision of appropriate tariffs as described in the answer to question 1.	Thank you for your comments.

Question 4:	Do you have any comments on the Code Manager's assessment of the costs and benefits, or case for change, for this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Octopus Energy (Energy Supplier)	No, we agree with the Code Managers assessment of the costs, the proposed costs are too expensive against the limited benefits.	Thank you for your comments.
Centrica (Energy Supplier)	We agree with the Code Manager's minded-to position to reject the proposed interim API solution. In particular, the central system costs are significant and not relative to the limited and short-lived benefits identified. On this basis, we do not consider that the proposed approach represents an efficient or proportionate use of industry resources. Whilst we agree with the Code Manager's assessment, we strongly urge that the underlying issue remains important and requires a clear, enduring solution at pace. We highlight that access to legacy switching and settlement data (particularly SSC and TPR) continues to underpin key consumer-facing processes, including tariff assignment and validation of multi-rate metering arrangements. The loss or degradation of this information presents a material risk, particularly to consumers who rely on multi-rate heating arrangements (e.g. Economy 7). This risk has already been evidenced through industry discussions and aligns with concerns we have raised under relevant REC issues (I0303 and I0273). **We strongly urge that I0273 is prioritised and progressed at pace.**	Thank you for your comments. This will be fed back to the lead analyst for I0273.

Stark (Metering Equipment Manager)	It is hard to understand the costs presented. The data should be available already to Electralink as they obtain copied message data for all D-flows sent over the DTN. The technical architecture also exists for them to make the information available via APIs. Therefore this should just be serving up an additional API.	Thank you for your comments. The Code Manager can only issue the quote and information provided by ElectraLink. We have no influence over their commercial decisions. Parties can contract with ElectraLink individually for this data if required, and have their own commercial negotiations with them regarding this.
National Grid Electricity Distribution (Distribution Network Operator)	We broadly agree with the Code Manager's assessment of the costs, benefits and overall case for change. In our view, the proposal represents a high central spend for a service that is not required by all parties and is set to be a short-term workaround, not a permanent fix.	Thank you for your comments.
OVO Energy (Energy Supplier)	In contrast to the commentary of the REC Cde Manager, OVO Energy believes the costs for this solution are reasonable, as it will enable suppliers to retrieve legacy settlement information during the onboarding journey. This would lead to positive customer outcomes as the supplier would be able to offer the customer tariffs appropriate to their property's unique set-up.	Thank you for your comments.

Question 5:	Do you agree with the proposed implementation approach of Big Bang?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Octopus Energy (Energy Supplier)	No. We believe this change should be rejected	Thank you for your comments.
Centrica (Energy Supplier)	N/A	n/a
Stark (Metering Equipment Manager)	Yes	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We do not have strong views on the proposed implementation approach given our thoughts on the change.	Thank you for your comments.
OVO Energy (Energy Supplier)	Yes.	Thank you for your comments.

Question 6:	Do you agree with the proposed implementation date of 26 June 2026?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Octopus Energy (Energy Supplier)	No. We believe this change should be rejected	Thank you for your comments.
Centrica (Energy Supplier)	N/A	n/a
Stark (Metering Equipment Manager)	Yes	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We do not have strong views on the proposed implementation date given our thoughts on the change.	Thank you for your comments.
OVO Energy (Energy Supplier)	Yes, as an aspirational target. However, it is probable that this date would be unachievable given its proximity.	Thank you for your comments.

Question 7:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be Self-Governance under the REC Change Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Octopus Energy (Energy Supplier)	n/a	n/a
Centrica (Energy Supplier)	N/A	n/a
Stark (Metering Equipment Manager)	Yes	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Thank you for your comments.
OVO Energy (Energy Supplier)	Yes	Thank you for your comments.

Question 8:	Do you agree with the Code Manager's recommendation to reject this Change Proposal? If not, please explain why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Octopus Energy (Energy Supplier)	Yes we agree with the Code Managers recommendation to Reject the change proposal	Thank you for your comments.
Centrica (Energy Supplier)	We agree; however, we emphasise the importance of prioritising I0273 to ensure a longer-term solution is progressed at pace to minimise detriment to consumers.	Thank you for your comments.
Stark (Metering Equipment Manager)	No – the cost assessment should be challenged	Thank you for your comments. The Code Manager can only issue the quote and information provided by ElectraLink. We have no influence over their commercial decisions.
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Thank you for your comments.
OVO Energy (Energy Supplier)	No, we disagree with the Code Manager's recommendation	Thank you for your comments.

Question 9:	Do you have any further comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Octopus Energy (Energy Supplier)	No further comments	n/a
Centrica (Energy Supplier)	We have no further comments.	n/a
Stark (Metering Equipment Manager)	n/a	n/a
National Grid Electricity Distribution (Distribution Network Operator)	No.	n/a
OVO Energy (Energy Supplier)	None	n/a