RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	Final Recommendation

CHANGE REPORT

R0300 AMENDMENTS TO D0312 TO ALIGN WITH BSC CP1622

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	26 June 2026
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Technical Expert Panel	CHANGE PATH	Self-Governance
PRIORITY STATUS	Critical	URGENCY	Urgent
IMPACTED STAKEHOLDERS	Electricity Supplies, ERDAs, MOAs		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	SUBJECT MATTER EXPERT
HARRIET TRUSS/CAROLINE FREIMULLER	APRIL HARBOUR	LORNA MALLON
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OVERVIEW

Elexon have raised CP1622 to amend the validation rules within the Supplier Meter Registration Service (SMRS) for the Number of Register Digits Data Item within the IF-005 Market Message, to allow digit values from 1–9, ensuring accurate data and reducing exceptions.

There are no Validation rules related to the D0312 Market Message which need to amended under the Balancing and Settlement Code (BSC), but the D0312 itself contains a Data Item Rule regarding the Number of Displayed Register Digits which needs to be amended in line with CP1622.

RETAIL ENERGY CODE

CONTENTS

1 Summary 3
2 Problem Statement 3
3 Impacts 4
4 Cross-Code Impacts 4
5 Proposal Plan 5
6 Stakeholder Engagement 5
7 Priority Status and Urgency 5
8 Proposed Solution 6
9 Draft Legal Text 6
10 Appendix 6
11 Glossary 7

RETAIL ENERGY CODE

BACKGROUND

1 SUMMARY

The Market-wide Half Hourly Settlements (MHHS) Programme Data Cleanse Closure Report identified an issue, understood to affect around 250,000 SMETS2 Electricity Smart Meters with Meter Register Digit configurations incompatible with MHHS design specifications. This prevents the SMRS from being accurately updated or recording register digits, risking data discrepancies, billing errors, and Settlement issues.

CP1622 Amendment of validation within SMRS for number of Meter Digits has been raised under the BSC to amend the Validation rules within SMRS for the Number of Displayed Register Digits (DI-091) Data Item within the IF-005 'MTD Updates to SMRS' (MM20035) Market Message, to allow digit values from 1–9. This amendment is proposed to ensure accurate data and reducing exceptions. This REC Change Proposal has been raised to amend the D0312 'Notification of Meter Information to MPAS' (MM00256) Market Message to allow the Data Item Rule regarding the Number of Displayed Register Digits (J2313) in line with CP1622.

This Change Proposal was raised as a fully formed solution, however during initial assessment, it has become apparent that the BSC and REC changes, as proposed, have wider industry impacts that have not so far been fully considered.

In addition, it was also identified that the Energy Market Data Specification (EMDS) currently links the DI-091, the DIP Data Item, to the incorrect legacy Data Item (J0478/DI50228 - Number of Register Digits) and not the J2313. Although, the Data Item is correctly captured in the MHHS design, and therefore what participants should have implemented, the incorrect linkage is leading to confusion, particularly when working through the required solution for these changes.

These are linked to an MHHS Programme risk impacting MHHS Migration and therefore requires urgent industry engagement and resolution to confirm the solution to be progressed.

2 PROBLEM STATEMENT

BSC CP1622 is looking to address that SMRS cannot accurately update the Number of Displayed Register Digits for a SMETS2 Smart Electricity Meter due to Validation rules currently in place. The MHHS Programme has requested that impacted Metering Points, assessed at approximately 250,000, are excluded from migrating into the MHHS arrangements.

The Validation rules proposed to be amended are those on the IF-005, which has direct impacts to the D0312. To unblock these Metering Points from MHHS Migration a solution is required that does not have unintended consequences on the use of the J2313 Data Item.

3 IMPACTS

CONSUMERS
Electricity Consumers with SMETS2 Meters

REC SERVICE PROVIDERS
ERDS Providers

REC PARTIES AND SERVICE USERS
Electricity Suppliers
Meter Operator Agents (MOAs)
Electricity Retail Data Agents (ERDAs)

REC DOCUMENTS / PRODUCTS
Data Specification

This change directly impacts Electricity Consumers as the purpose of the Number of Displayed Digits is to support customer billing in line with what a Consumer can see on the meter display.

Although under MHHS the Validation rules are governed under the SMRS obligations in the BSC, in the non-MHHS arrangements the governance for the D0312 sits with the ERDAs. The IF-005 and D0312 are closely linked in the Meter Point Registration System (MPRS) that supports both SMRS and ERDS, and therefore impacts on both the REC and BSC providers need to be considered.

It is expected that an ERDS impact assessment will be required if any changes are to be made to the D0312 Market Message notes.

MOAs are impacted by this change, as the REC Parties exchanging the J2313 Data Item.. Electricity Suppliers are also impacted due to their use of the data for billing processes.

MHHS
This Change Proposal and BSC CP1622, are directly linked to a MHHS Programme risk that identifies approximately 250,000 Smart Electricity Meters which are currently excluded from being migrated into the MHHS arrangements.

4 CROSS-CODE IMPACTS

This is a cross-code change with BSC CP1622 Amendment of validation within SMRS for number of Meter Digits, with the BSC as the lead code.

During the Code Manager initial assessment of R0300 following submission, it was identified that the Code Manager could not support the solution as proposed under CP1622 due to the wider impacts to industry. A REC consultation response was submitted on CP1622 and a number of meetings have been held with cross-code and MHHS Programme stakeholders throughout January where it has been agreed that further industry engagement is required.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Change Proposal		**12 Dec 25**	**24 Mar 26**
	Code Manager initial assessment	December	December
	Cross-code industry engagement	December	February
	Solution development	February	March

Until engagement with industry has progressed, and the underlying issue and potential solution have been better understood, the Code Manager is not in a position to recommend a Proposal Plan beyond this activity.

The Code Manager will continue to progress R0300 as an urgent change, unless it is established that the MHHS Migration risk is re-assessed or urgency is otherwise no longer required.

6 STAKEHOLDER ENGAGEMENT

REC and BSC change colleagues are working together to progress a solution as a matter of urgency to address the risk that has been raised against MHHS Migration. A workshop has been scheduled for 5 February 2026, and invitations have been sent to the distribution lists for the REC Change Issues Group and Elexon's MHHS Expert Group. It should be noted however that the solution required has wider impacts than MHHS.

7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	1	25	25
	Retail Markets Impact	Innovation and Market Arrangements	3	15	45
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	5	5
		Legal and Regulatory Compliance	3	13	38
Resource	Complexity / Effort / Duration		3	8	23
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	15	0
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Significant Code Reviews	3	20	60
				Overall Priority Score (rounded)	195

Priority Status	CRITICAL
Change Proposal Type	URGENT

This Change Proposal has been given a priority status of critical due to:

- Its direct impact on Consumers;
- Its impact on market arrangements and regulatory compliance – a large number of Metering Points are being excluded from migration to the MHHS arrangements until it is implemented; and

- To date, cross-code activity with a targeted implementation date of June 2026.

SOLUTION

8 PROPOSED SOLUTION

This solution proposes the removal of the below Data Item Rule present for the Number of Register Digits (J2313 / DI51600) within the D0312 'Notification of Meter Information to MPAS' (/ MM00256) Market Message for all Scenario Variants:

"Where the Meter Type is S1, the value should be populated as per the manufacturer specification. Where the Meter Type is S2A, S2AD, S2ADE, 2ADF, 2ADEF, 2AEF, 2AF, S2B, S2BD, S2BDE, 2BF, 2BDF, 2BDEF or 2BEF the value must be 5. Where the Meter Type is prefixed with S2C the value must be 6. Where the Meter Type is 2CDEF, 2CF, 2CDF or 2CEF the value must be 6."

This solution is currently under review and may be updated following industry engagement.

9 DRAFT LEGAL TEXT

For information on the change as raised, the red-lined version of the Data Specification to deliver the proposed solution to R0300 can be found here.

10 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
RELATED CHANGE(S)	CP1622 Amendment of validation within SMRS for number of Meter Digits CP1622 - Consultation Responses

RETAIL ENERGY CODE

11 GLOSSARY

TERM	DEFINITION
Balancing and Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
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.
Electricity Retail Data Agent (ERDA)	means a provider of a DNO's Electricity Retail Data Service.
Electricity Retail Data Service (ERDS)	means the electricity registration services provided under this Code to support the provision of electricity retail data to the CSS and other services.
Market Message	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
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."
Metering Point Administration Service (MPAS)	means the service of that name which each DNO is required to provide under its Electricity Distribution Licence.
Metering Point Registration System (MPRS)	means the System used or procured by each DNO in order to provide the Electricity Retail Data Service in accordance with the REC and / or the Supplier Meter Registration Service in accordance with the BSC.
Supplier Meter Registration Service (SMRS)	As defined within the BSC: means the service provided or to be provided by a Licensed Distribution System Operator for the registration of Metering Systems at Boundary

	Points on its Distribution System(s) and its Associated Distribution System(s) (if any).