RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0321 DNOS CREATE EXPORT MPANS FOR NEW HOUSING DEVELOPMENTS

On 08 May 2026 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for R0321 DNOs Create Export MPANs for new housing developments.

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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RESPONSIBLE COMMITTEE	REC Change Panel
99LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	08 May 2026
RESPONSE DEADLINE	01 June 2026

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	The onus must be where the DNO is made aware of an export supply at the time of the connection request. Any subsequent requests that don't require physical work must be actioned by the supplier. Although the logical disconnection process is available, we do not expect high volumes because of this change. If that is the case, the process is not working and DNOs are using resources upfront unnecessarily.	Thank you for your comments. The Code Manager also does not expect there to be high volumes of logical disconnections required, due to the Government policy of new builds requiring solar panels.
Scottish Power Energy Networks (Distribution Network Operator)	We have a number of comments on this proposed solution. We do not believe that the processes and obligations for DNO have been considered as part of the wider Industry processes. We would dispute the claim in the initial overview that the creation of an export sits with the Supplier, we have always maintained that requests for export MPANs via the SDEP process is not appropriate in most instances. As a DNO we are responsible for the creation of the export MPANs and such we have an obligation to ensure that the export installation has been carried out to an adequate standard to ensure the safety of the Network.	Thank you for your comments. If as a DNO you are already creating Export Metering Points at the point of approving the G98 and G99 documents/at the request of the installer, and not waiting for a request to come from an Electricity Supplier, this Change Proposal will have no impact on the way your organisation works. This Change Proposal has been flagged at the Cross Code Steering Group, with no cross-code impacts identified by DCUSA or CUSC.

	The requirements are detailed on the ENA website, and we believe that any change would also need to be reviewed under the DCUSA and CUSC codes. Latest guidance document is available at DG_Guide_2026.pdf. This detail the 'the Engineering Recommendations (ERECs) that cover the connection of Distributed Generation to the distribution system are EREC G98 (for smaller generation capacities less than 16A per phase) and EREC G99 (for all other generation capacities). These are technical documents that are available on the ENA's Document catalogue: EREC G98 and EREC G99.' Within our own website we have details of the bulk process to be followed by installers of multi sites to request MPANS following installation. Export installation certificates are checked prior to the provision of an Export MPAN, to ensure that they are appropriate (no upgrades required) and that installation has been carried out by an approved installer. Application Forms and Guides - SP Energy Networks The Supplier (as far as we are aware) has no such obligation, and as such we believe that the DNO should not be creating export MPANS at the request of the Supplier as part of the process. (requests should come from the installer or the customer with supporting documentation). We do not believe that this change takes into account, the DNO process and is solely focussing on the provision of am MPAN to allow the Supplier to register an MPAN (not taking into account any potential safety issues that may arise). In addition to the above we also have the following points of clarity	This Change Proposal is not limited to large housing developments, they just make up the bulk of the business case. This obligation would apply for a single Premises. The Code Manager will make sure this is clearer in the next version of the Change Report. The Code Manager is aware of the large volumes of Export Metering Points that have been created and never registered, this has been flagged with REC Performance Assurance.

	• Within this change there is no clear guidance on what constitutes a 'developer' would this be more that 1 house/greater than 5/greater than 20? • There has been no guidance on how the DNO would know that an export was not needed, this would be at the discretion of the Customer and whether they choose to use the export. We currently have large volumes of export MPANs that have been created that have never been registered with a supplier. Has the proposer considered how this would be verified? • We are unable to identify an MPAN that has been requested by a supplier to allow us to disconnect the MPAN if there has been no supplier registration after a 5 day period (as referenced in the REC) unless we instigate a manual checking process, however even if this was put in place there is a risk that this then increases the workload for DNO if the suppliers consistently do not register the MPAN for the customer within these timeframes.	
UK Power Networks (Distribution Network Operator)	We continue to have concerns, many of which have already been raised earlier in the process, regarding how the raising of Export MPANS for new-build developments would operate in practice. It seems unlikely that individual flats would have either technology installed directly. However, where a block of flats forms part of a wider development, it is unclear whether we would still be expected to raise new export MPANs for those properties, despite the possibility that such connections would subsequently be disconnected or never utilised. Clarification on how these scenarios are intended to be treated would therefore be appreciated.	Thank you for your comments. The Code Manager is investigating tweaking the solution so the Export Metering Point is created at the point of approving the G98/99 form, as "where the DNO is aware" is currently vague and difficult to audit. The Code Manager is aware of Export Metering Points not being registered and has raised with this REC Performance Assurance.

	Historically, the industry has faced a problem with new MPANs being created but never subsequently used. DNOs have invested significant time and effort in largely resolving this issue. However, without detailed visibility of where and when MPANs are created, together with a robust process for removing those that are no longer required, there remains a risk that large numbers of unused MPANs could accumulate over time. In practice, the number of redundant MPANs should be minimal if their creation is properly considered from the outset, but without appropriate controls there is a real possibility of a growing volume of MPANs being created with no realistic prospect of ever being used.	
National Grid Electricity Distribution (Distribution Network Operator)	As a rule, we do not create export MPANs until all commissioning paperwork has been received. This is important as we must maintain full awareness of all equipment connected to our network to ensure safety and to aid future network planning. For this reason, we do not agree with the proposed changes to REC Schedule 27 – RMP Lifecycle, which seeks to enforce a new process whereby we (as a DNO) would be expected to raise export MPANs at the same time as import MPANs (i.e. prior to installation and commissioning of equipment), as this could potentially jeopardise the safety, stability and operational level of our network over time, ultimately leading to a poor customer experience.	Thank you for your comments. The Code Manager is investigating amending the solution to after the approval of the G98/99 document, to remove this risk.
Centrica (Energy Supplier)	We fully support the proposal	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE supports the proposed solution for the DNOs to create export MPANs for new housing developments.	Thank you for your comments.

BUUK (Distribution Network Operator)	We support this Modification and believe it benefits the upcoming changes made by the Future Home Standard.	Thank you for your comments.

Question 2:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	Suppliers should be mandated to send a logical disconnection where they are made aware by the customer that the export MPAN is no longer required.	Thank you for your comments. As the logical disconnection process is detailed under the Distribution Connection and Use of System Agreement (DCUSA) Schedule 33, the Code Manager requests you raise a DCUSA change regarding this. The Code Manager will not raise this as a cross-code change, as this change not being made would not prevent the implementation of R0321.
Scottish Power Energy Networks (Distribution Network Operator)	We do not believe that the legal text considers the DNO process to receive the installation documentation. We believe that section 7 is not fit for purpose in this regard.	Thank you for your comments. The Code Manager is investigating linking the obligation to the approval of the G98/99 document, as “where the DNO is aware” is currently vague and difficult to audit.
UK Power Networks (Distribution Network Operator)	The legal text should also consider which premises would be eligible for the creation of an export MPAN. As noted in the response to Q1, it is unlikely that this would extend to flats or other similar premises. In addition, the legal text should set out a clear process to ensure that	Thank you for your comments. The legal text does not say that Export Metering Points should be created for all Premises, only those Premises where one is

	export MPANs which are created but remain unused are identified and removed within an appropriate timeframe. Neither eligibility criteria nor arrangements for the timely removal of unused MPANs are currently addressed in sufficient detail within the legal text.	requested by the Consumer/installer/developer etc. REC Schedule 27 RMP Lifecycle quite broadly allows for DNOs to disconnect Metering Points it feels are no longer required (4.1c), but the Code Manager will investigate if additions are required.
National Grid Electricity Distribution (Distribution Network Operator)	We do not agree with the proposed changes to the legal text for the reasons stated above.	Thank you for your comments.
Centrica (Energy Supplier)	We have no comments on the legal text	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	SSE has no issues with the proposed legal text.	Thank you for your comments.
BUUK (Distribution Network Operator)	We think this looks sensible.	Thank you for your comments.

Question 3:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	We agree with the principle of the change, but it should be clarified in the Problem Statement that the change relates to new development Import and Export MPAN requests. Bulk requests for existing developments which require Export MPANs, and new developments where an Export MPAN is required (in addition to the new Import MPAN) should be considered as separate processes in any solution development.	Thank you for your comments. The purpose of this Change Proposal is for any new connection where an Export Metering Point is required and the DNO is made aware of this, they should create the Export Metering Point without a request from the Electricity Supplier. This would include bulk requests (e.g. new housing developments with 100s/1000s of Sites).
Scottish Power Energy Networks (Distribution Network Operator)	We do not believe that the proposed solution addresses the problem statement. We currently have a process in place (as per our response to question 1), there is no cognisance of the additional administration that the step to manage these through SDEP has on DNO. We currently issue export MPANs when paperwork has been received and checked and agreed that an export MPAN can be created. Export MPANs will be associated to the import at the point of creation in accordance with industry processes. There should be no requirement for Suppliers to request an MPAN if the developers follow the current process.	Thank you for your comments. The implementation of this Change Proposal would remove the use of SDEP in this specific scenario (new connections), as the Electricity Supplier would no longer be involved.

UK Power Networks (Distribution Network Operator)	We would suggest that there are other options that could be looked at to help with the issue defined here. If we determine what the issue is with current method of raising Export MPANs, it can be explored what needs to change to make this a more efficient process for all parties. UK Power Networks have made several improvements in this area using automation for Export MPAN creation. We remain concerned that the proposal could still result in export MPANs being created which are never subsequently used or traded. This risk should, at a minimum, be explicitly considered, with appropriate arrangements included within the legal text to ensure such MPANs are identified and addressed in a timely manner, as explained further in our response to Q1.	Thank you for your comments. This risk will be captured in the next version of the Change Report, but the Code Manager believes it is minimal due to the announced Government policy of new builds requiring solar panels.
National Grid Electricity Distribution (Distribution Network Operator)	No. The problem statement sets out an issue which is described as being negatively impacting to consumers and the journey to net zero. However, we believe that the proposed solution will have similar negative effects to consumers and the journey to net zero as both rely heavily upon a stable and well-planned electricity network (as per our response to Q1). Efficient network planning is made easier with confirmation of the load due on our network which comes from the commissioning paperwork. Whilst we accept that developers can inform us of the equipment that they plan to install at the time of requesting MPANs, we would also point out that these plans can change and without the commissioning paperwork, there is no way to confirm what has or hasn't been installed and the associated timeframes.	Thank you for your comments.

Centrica (Energy Supplier)	Yes, but would need to understand what is considered as 'large development'	Thank you for your comments. The Code Manager will make clearer in the Change Report this is expected to apply to all new connections – it is just housing developments with 100s or 1000s of Sites are expected to make up the bulk of the business case.
SSE Energy Supply (Energy Supplier)	The proposed solution should help to resolve the problem statement, but the situation should be reviewed after 12 months to see if further steps are required.	Thank you for your comments.
BUUK (Distribution Network Operator)	Yes.	Thank you for your comments.

Question 4:	Do you think we have identified and considered all processes and scenarios that may be impacted through the implementation of the proposed change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	We facilitate bulk MPAN requests where suppliers raise these via bilateral agreement and this process works in terms of MPAN generation but does not assist the MPAN supplier registration process. We have concerns that the solution may risk an increased pot of unregistered Export MPANs requiring investigation and disconnection. If the process does not work as intended, the DNO will waste resources at the front end (MPAN creation) and back end (MPAN disconnection) of the process.	Thank you for your comments. The Code Manager will document this risk, but believes it will be minimal due to the Government policy of new builds requiring solar panels.
Scottish Power Energy Networks (Distribution Network Operator)	As per responses to previous questions, we do not believe that there has been due consideration of all processes and scenarios within the industry in the proposed change.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	No, as stated above, we believe there are scenarios where solar will not be installed within a new build development, and therefore this needs to be fully considered within the proposal and associated legal drafting. In addition, there should be a robust process to ensure that where an MPAN is created but ultimately not required, this is identified and appropriate action is taken within a timely manner. The proposal does not identify alternatives, does not describe the solution, or any potential impacts	Thank you for your comments. As said previously, the solution and legal text does not request that Export Metering Points are created for Premises they are not requested on. The logical disconnection process is available for any Metering Points created but not required. This is detailed under DCUSA Schedule 33, so the Code Manager would

		request a DCUSA change is raised if you wish for this process to be reviewed. The Code Manager will not raise this as a cross-code change, as this change not being made would not prevent the implementation of R0321.
National Grid Electricity Distribution (Distribution Network Operator)	No, it appears that future network planning has not been sufficiently considered. In addition, using a process of logical disconnection for any export MPANs that have been created and not needed would be likely to create increased workloads for DNOs, requiring procedures for tracking, etc.	Thank you for your comments. The Code Manager believes the number of logical disconnections required would not significantly increase, but this will be captured as an assumption in the Change Report.
Centrica (Energy Supplier)	This proposal is very welcome but still relies on the developer contacting the DNO for accreditation in advance of applying for SEG.	Thank you for your comments. The Code Manager is investigating amending the solution to use the approval of the G98/99 document as the starting point, to add clarity of when this process should be used.
SSE Energy Supply (Energy Supplier)	We do not have anything to add at this stage.	Thank you for your comments.
BUUK (Distribution Network Operator)	Yes.	Thank you for your comments.

Question 5:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	We require a minimum lead time of 6 months from approval.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	At this point we are unable to provide a lead time, as we do not believe that all processes have been considered. If this change was progressed, this would be significant both in terms of process and system changes, and would require a full legal review of the safety impacts that may transpire if we were to create MPANs prior to completion of work, we believe that this would require further consideration in terms of the DCUSA and CUSC change processes, in addition to further discussion with the ENA.	Thank you for your comments. Import and Export Metering Points are already routinely created before the completion of Site works.
UK Power Networks (Distribution Network Operator)	We do not believe this proposal should be implemented until proper consideration is given to the scenarios and processes required. The wider impacts and alternatives should be developed and described before it is appropriate to comment fully on what is needed to implement a workable solution. If automation is required, this may take 12 months or more to procure, develop and deploy. However, the lack of definition in the proposal makes this an impossible question against which to provide a confident response.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	A minimum of 9 months would be required as we would need to revise a number of processes, implement new procedures, revise/create new	Thank you for your comments.

	policies, LWIs, and working practices. This would also need to include the retraining of staff.	
Centrica (Energy Supplier)	Minimal time to brief to all internal stakeholders	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No lead time is required.	Thank you for your comments.
BUUK (Distribution Network Operator)	We believe that we would need 6+ months in order to make system changes to deal with the increased volume of export MPANs we would be creating.	Thank you for your comments.

Question 6:	Are you aware of any constraints on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	N/A	n/a
Scottish Power Energy Networks (Distribution Network Operator)	As per response to Q5, we believe that this would require further consideration in terms of the DCUSA and CUSC change processes, in addition to further discussion with the ENA. This proposal would require significant system and process changes to accommodate.	Thank you for your comments. This Change Proposal has been discussed at the Cross Code Steering Group, with no impacts identified by DCUSA or CUSC. If you have examples of specific changes required to DCUSA or CUSC in order to facilitate this Change Proposal, please provide these to the Code Manager. The Code Manager has reached out to the respondent to request these examples.
UK Power Networks (Distribution Network Operator)	Only as stated in response to Q5	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	No, as long as the implementation lead-time above is taken into consideration.	Thank you for your comments.
Centrica (Energy Supplier)	No	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.

BUUK (Distribution Network Operator)	Only those we refer to in Q7.	Thank you for your comments.

Question 7:	Do you foresee any risks to your qualification or migration plans to be delivered as part of MHHS implementation caused by the delivery of this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	N/A	n/a
Scottish Power Energy Networks (Distribution Network Operator)	As a DNO we are already qualified, we do not see any risk to Supplier migration plans as a result of this.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	Yes, there is a possible conflict of priorities and/or resources. The proposal should be developed more fully whilst MHHS migration is proceeding and then a plan for deployment after MHHS has concluded should be developed'	Thank you for your comments. The Code Manager is aware that all DNOs have already qualified under the MHHS arrangements, but will take this under consideration as a wider industry view.
National Grid Electricity Distribution (Distribution Network Operator)	Not as such, but we would point out that part of the MHHS Programme Objective is to enable a smart and flexible energy system, the basis for which, we believe, would be a safe, stable and well-planned network. We do not consider the proposed changes to be entirely supportive of this.	Thank you for your comments.
Centrica (Energy Supplier)	No	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.
BUUK (Distribution Network Operator)	No.	Thank you for your comments.

Question 8:	Would implementing the proposed solution incur any costs to your business? If so, please provide details breaking down design/build/test costs and on-going costs. If preferable, please indicate which of the below ranges your costs may fall: A) Nil; B) Up to £9,999; C) Between £10,000 and £49,999; D) Between £50,000 and £99,999; or E) more than £100,000.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	There will be a cost impact but it is difficult to quantity as volumes of MPAN creation and disconnection is unknown.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	We are unable to quantify a cost to our business as this spans multiple codes and we believe that there is a requirement to impact assess any changes on both the DCUSA and CUSC before any costs could be provided.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	As per our response within Q5, this change would need to be incorporated into our existing MPAN creation processes and supporting software, along with training a broad group of staff, and potential increase in FTEs, would likely result in the costs indicated below in section 'C'.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We have not yet been able to fully analyse the costs that this change would incur for us, however based on the need to revise and implement new processes, policies, LWIs, and working practices, and retrain staff accordingly, we would estimate the costs to come in between £10,000 and £49,999.	Thank you for your comments.

Centrica (Energy Supplier)	A) Nil	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	A) Nil	Thank you for your comments.
BUUK (Distribution Network Operator)	I would estimate something within option C.	Thank you for your comments.

Question 9:	Do you identify any benefits to your business or to the wider industry through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	Improved customer service as the customer will receive both import and export MPANs and will not be referred to the supplier to request the export MPAN.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	We have not identified any benefit to our business in relation to this proposed change, if anything this would as currently written increase our costs, provide SLA's that are unachievable and condone the bypassing of the current Network safety measures that are already in place with the current process. We understand the frustration that other parties/customers may have in obtaining an export MPAN for registration purposes, however we feel that the necessary steps already in place are required to ensure the safety of the network and customers.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	On the basis that an export MPAN would need to be created for every new premise from 2028, this proposal could deliver long-term benefits for all parties involved, including network operators and Suppliers, whilst also creating a more seamless process for Customers. However, as noted in our responses above, we do not believe that all new build properties will be able to accommodate solar PV. As a result, it is likely that a two-tier process would still be required. Considerably more work needs to be put in to define a workable solution to develop a	Thank you for your comments. The solution would not require the DNO create an Export Metering Point for every Premise from 2028, only those they are aware require one. The Code Manager is investigating tweaking the solution so the Export Metering Point is created at the point of approving the G98/99

	more efficient solution which avoids introducing duplication or unnecessary work and a better customer experience. It is therefore important that the issues identified within our response are fully addressed as part of any enduring solution.	form, as “where the DNO is aware” is currently vague and difficult to audit.
National Grid Electricity Distribution (Distribution Network Operator)	No. We believe there would likely be negative implications.	Thank you for your comments.
Centrica (Energy Supplier)	Improves SEG processing efficiency, enhances customer understanding of the end-to-end process, and reduces the need for repeated communications between the supplier, DNO, and customer. This will also play a vital part in Net-Zero.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.
BUUK (Distribution Network Operator)	Yes, we will be able to group the requests together from one developer source rather than them having to go through the Supplier route for us to create individually.	Thank you for your comments.

Question 10:	Taking into consideration both the costs and the benefits (either by your business or by the industry), do you consider this change should be made?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (Distribution Network Operator)	We agree with the principle of the change but believe further work is required before implementation.	Thank you for your comments. The Code Manager has clarified this with the respondent, and only the point raised in Q2 was provided a specific suggestion. The general request to review the solution will done by the Code Manager alongside all other responses.
Scottish Power Energy Networks (Distribution Network Operator)	We do not believe that the current proposal has all the information across the various codes to be able to assess cost and benefit.	Thank you for your comments. DCUSA and CUSC have not identified any impacts to their codes from the implementation of this Change Proposal.
UK Power Networks (Distribution Network Operator)	We believe that, provided the points we have identified are sufficiently addressed in the longer term, this change has the potential to deliver cost savings for all parties and therefore should be progressed. However, further work is required, along with an additional opportunity for REC parties to review the proposal before it is taken forward. If these matters are not fully considered and appropriately addressed, we do not believe the change should be implemented.	Thank you for your comments.

National Grid Electricity Distribution (Distribution Network Operator)	No.	Thank you for your comments.
Centrica (Energy Supplier)	Yes.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes.	Thank you for your comments.
BUUK (Distribution Network Operator)	We believe that this change should be made, as long as sufficient time is allowed to allow for system changes to be made to cope with the increase.	Thank you for your comments.

Question 11:	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
Scottish Power Energy Networks (Distribution Network Operator)	n/a	n/a
UK Power Networks (Distribution Network Operator)	We have no further comments to those raised above.	n/a
National Grid Electricity Distribution (Distribution Network Operator)	No further comments.	n/a
Centrica (Energy Supplier)	No comments to add	n/a
SSE Energy Supply (Energy Supplier)	No.	n/a
BUUK (Distribution Network Operator)	No.	n/a