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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0321 DNOS CREATE EXPORT MPANS AFTER APPROVING G98/99 COMMISSIONING DOCUMENTS

On 21 August 2026 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0321 DNOs Create Export MPANs After Approving G98/G99 Commissioning Documents.

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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RESPONSE TYPE	**NON-CONFIDENTIAL**
DATE ISSUED	08/10/2026
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Caroline Freimuller

DATE CONSULTATION ISSUED	21 August 2026
RESPONSE DEADLINE	14 September 2026

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Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	**Position: We strongly support the proposed solution.** The proposal delivers a practical and proportionate improvement to the Export MPAN creation process by placing responsibility with the DNO once the relevant G98 or G99 commissioning documentation has been approved. As DNOs already hold the information required to create the Export Metering Point, the proposed approach removes an unnecessary supplier-led request and streamlines the process. We expect the change to: • reduce administrative effort for Electricity Suppliers; • improve process efficiency between DNOs and Suppliers; • support the timely creation of Export MPANs; and • simplify customer journeys, particularly in the new build sector where the creation of Export MPANs can currently involve additional manual interactions. The proposal represents a sensible allocation of responsibilities to the party best placed to undertake the activity and should improve the overall customer experience. **Recommendation**: Approve the proposed solution.	Thank you for your comments.

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National Grid Electricity Distribution (Distribution Network Operator)	Yes, we are happy with the proposed solution, although we question whether amendments are required to the legal text (please see our response to Q2).	Thank you for your comments.
Norther Power Grid (Distribution Network Operator)	No, we have concerns that this proposal could lead to the creation of MPANs that are ultimately unnecessary, remain untraded, and subsequently require investigation and disconnection by the DNO. This would result in avoidable resource and cost impacts for DNOs, both at the point of MPAN creation and later during the associated investigation and disconnection activities.	Noted, thank you for your comments We aim to monitor MPANs that are created but not registered as part of the benefits realisation analysis of this Change Proposal, should it be approved for implementation. If there is a substantial increase in this activity it will be addressed via a future Issue.
SP Energy Networks (Distribution Network Operator)	SPEN are supportive of the proposed solution; we see no benefit in the Supplier carrying out a 3rd party role in the requests for Export MPANS. Currently we operate the proposed solutions of creating the export when appropriate evidence has been provided by the Customer or installer as this provides certainty to us that the installation is both legitimate and safe. We appreciate the REC taking on board the feedback from the DNOs in the collation of this change.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	We are pleased to see how the proposal has developed following the responses to the earlier consultation on this change, as a result we are now supportive of the change as proposed	Thank you for your comments.

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Question 2:	Do you agree with the proposed legal text? Specifically, do you agree that the G98 Engineering Recommendation Installation Document (Form B) or G99 Engineering Recommendation Installation Document (Form A3-1 or A3-2) should be explicitly referenced?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	**Position: We support the intent of explicitly referencing the relevant G98 and G99 documentation within the REC arrangements**. From an operational perspective, explicitly identifying the relevant G98 and G99 documents provides greater clarity regarding the trigger for Export MPAN creation and should support a more consistent approach across DNOs. As an Electricity Supplier, we have not undertaken a detailed legal review of the drafting. However, the proposed references appear aligned with the policy objective of establishing a clear and auditable trigger for the DNO obligation to create an Export Metering Point. We consider it important that the final drafting clearly reflects the intended process and minimises ambiguity regarding when Export MPAN creation is required. **Recommendation**: The final drafting should continue to provide a clear and unambiguous operational trigger linked to the relevant G98 and G99 documentation.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	We do not feel that there is a need for these documents to be explicitly referenced, and instead we question whether it might be more	Thank you for your comments.

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	appropriate to refer to them as 'all commissioning documentation requested by the DNO' or similar terminology. This is mainly for two reasons: 1. In certain G99 scenarios, we require other documentation such as a final circuit wiring diagram, a Compliance Verification Report and schedule of protection settings. There may well be other documentation required in particular circumstances. The current proposed legal text suggests that the named documents are all that is required as part of the commissioning approval process and this may lead to confusion. 2. Not specifying the name/s of the documentation required would future-proof the text, meaning that, should there be any changes to the ENA EREC G98/G99 commissioning process in future, it may not require a REC change to update Schedule 27 in accordance.	The legal text states that the record for the new Metering Point will be created once the form is approved, not merely received and you have confirmed that the G98/G99 would not be approved until the additional forms you may require for different scenarios have been received. The Code Manager agrees that the proposed legal text may need to be updated in the future if there are changes to the ENA EREC G98/G99 commissioning process, however we feel this is the most suitable solution in order for there to be an auditable trigger for the new obligation.
Norther Power Grid (Distribution Network Operator)	Although we do not support the proposal, if it is implemented, we agree that the G98/G99 documentation should be explicitly referenced within REC Schedule 27 – RMP Lifecycle.	Thank you for your comments.
SP Energy Networks (Distribution Network Operator)	We have identified no issue with the legal text.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	We believe that the most appropriate solution would be that export MPANs are ONLY raised once the necessary (G98 or G99) is submitted rather than at any other time, this would align the processes and ensure that requests are not missed or duplicated which would only add to any frustration or confusion which this change is looking to address.	

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Question 3:	For DNOs: can you confirm what percentage of G98/99 Engineering Recommendation Installation Documents you have approved within the past 12 months where the Premise did not require an Export Metering Point to be created? Can you confirm what scenarios you would expect to approve said documents, but the Premises to not require an Export Metering Point?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	Position: Not applicable from an Electricity Supplier perspective.	N/A
National Grid Electricity Distribution (Distribution Network Operator)	Unfortunately, it has not proven as easy as anticipated to obtain an accurate percentage here, but we are currently comparing reported data and will endeavour to provide this information directly if still required. The only general scenarios that we are aware of would be where generation equipment is installed, but customers are not looking to receive settlement in return for generated energy. It is also worth pointing out that we currently have around 2500 export MPANs which have been created but are currently showing as unregistered. We are happy to provide further information to REC Performance Assurance if required.	Thank you for your comments.
Norther Power Grid (Distribution Network Operator)	Of the G98/99 Engineering Recommendation Installation Documents approved, we have not created MPANs for the following: 2025 calendar year – 63% 2026 year to date – 57% We suspect that export MPANs are not being created for export supplies below 30kW. As this is currently a supplier-led process we're	Thank you for your comments. We aim to monitor MPANs that are created but not registered as part of the benefits realisation analysis of this Change Proposal, should it be approved for implementation. If there is a substantial increase in this activity it will be addressed via a future Issue.

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	unable to comment on the specific circumstances in which an export MPAN may not be required. However, taking the earliest example from our data, if an export MPAN had been created in January 2025, it would have remained unregistered within ERDS and central industry systems. It would now be approximately 21 months old and, during that period, would have been subject to regular DNO review and investigation to determine whether it was still required. In such cases, the information available to support those investigations is often limited, with details typically relating to the installer rather than the end customer. This can make it difficult to establish the status of the connection and may result in unnecessary operational activity where the export supply has not progressed as anticipated.	
SP Energy Networks (Distribution Network Operator)	This is not something that we monitor, as a DNO we may not have a view of whether the customer wishes to utilise their export capability, if we receive the reports from the installer or the builder, we would, and all information meets the acceptance criteria create the export MPAN for the customer to arrange registration. We have however conducted analysis on the number of Export MPANs that have been created and not registered over this calendar year to date. This is not a clear view of these MPANs not being required, however may give an indication of the speed at which the MPANs are being provided to the Supplier to arrange registration. 2026 – 8,549 unregistered exports	Thank you for your comments. We aim to monitor MPANs that are created but not registered as part of the benefits realisation analysis of this Change Proposal, should it be approved for implementation. If there is a substantial increase in this activity it will be addressed via a future Issue.

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	We have also reviewed the number of export MPANs created for 2025 which remain unregistered, this value is 9,968 unregistered exports. These volumes are across our 2 MPIDs	
UK Power Networks (Distribution Network Operator)	From our experience the vast majority of G98/99 documents require an export MPAN to be created, the only example that we are aware of where an export MPAN was not required is where one already exists for the premises in question.	Thank you for your comments.

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Question 4:	Do you agree with the proposed implementation approach (Big Bang)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	**Position: We support the proposed Big Bang implementation approach**. A single implementation date will provide clarity and consistency across industry participants. It will ensure all DNOs adopt the new process simultaneously and avoid differing operational approaches during a phased implementation period. As the proposal is fundamentally a process change rather than a major system transformation, a Big Bang implementation appears proportionate and appropriate. **Recommendation**: Proceed with the proposed Big Bang implementation approach	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree that this would be the most suitable implementation approach.	Thank you for your comments.
Norther Power Grid (Distribution Network Operator)	N/A	N/A
SP Energy Networks (Distribution Network Operator)	Yes, we believe that big bang is the appropriate implementation approach, we do not believe that this solution would be workable if it was staged implementation, and would cause confusion and additional work for Industry parties.	Thank you for your comments.

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UK Power Networks (Distribution Network Operator)	We believe that this change can only be implemented in the way proposed; it would likely cause more issues if it was introduced in any other way.	Thank you for your comments.

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Question 5:	Do you agree with the Code Manager's assessment of the costs and benefits for this change? Specifically, do you think the costs remain the same with the updated solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	**Position: We agree with the Code Manager's assessment of the costs and benefits**. The primary benefit of the proposal is the removal of a manual supplier activity where the DNO already possesses the information required to create the Export Metering Point. The change should therefore deliver operational efficiencies and reduce administrative burden across the industry. Additional benefits include: • earlier availability of Export MPANs for registration activities; • improved support for new housing developments; • reduced dependency on supplier intervention; and • a more streamlined customer journey. From an Electricity Supplier perspective, we do not currently anticipate material implementation costs and therefore broadly agree with the Code Manager's assessment. **Recommendation**: We agree with the Code Manager's assessment of the expected costs and benefits.	Thank you for your comments.

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National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree. Our estimate of incurred costs has not changed following the updating of the solution.	Thank you for your comments.
Norther Power Grid (Distribution Network Operator)	N/A	N/A
SP Energy Networks (Distribution Network Operator)	We agree with the code managers assessment of costs.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	We agree with the benefits identified for this change, but we can see no view on costs within the documents circulated to parties, other than what has been stated in previous responses. However, we believe that these are in line with our expectations and the benefits of this change would be largely positive.	Thank you for your comments.

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Question 6:	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 Change Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	**Position: Yes. We agree that Self-Governance is appropriate**. The proposal represents an operational process improvement which reallocates responsibility for an existing activity without introducing significant consumer detriment, material system impacts or wider policy changes. The modification delivers process efficiencies and improved customer outcomes while remaining within the scope of matters that can reasonably be progressed through Self-Governance. **Recommendation**: The Change Proposal should remain subject to Self-Governance approval.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree that this Change Proposal should be subject to Self-Governance approval by the REC Change Panel.	Thank you for your comments.
Norther Power Grid (Distribution Network Operator)	N/A	N/A
SP Energy Networks (Distribution Network Operator)	Yes, we believe that this change should be self-governance.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	Yes, we believe that self-governance is appropriate for this change.	Thank you for your comments.

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Question 7:	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**
British Gas (Energy Supplier)	**Position: We support the proposed implementation date of 25 June 2027**. The proposed implementation date appears to provide sufficient time for DNOs to complete any required operational or system changes while ensuring delivery of the intended benefits within a reasonable timeframe. We note that DNO responses identified implementation lead times of between six and twelve months, and the proposed date appears consistent with those responses. The benefits associated with reducing supplier administration and improving Export MPAN creation processes support implementation as soon as practicable. **Recommendation**: Approve the proposed implementation date of 25 June 2027.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, this would be the earliest that we would like to see implementation take place. As a DNO we will require adequate time to plan for, and action, any changes that might be required to our processes, policies and general documentation in line with this change. If for any reason approval of this change is delayed, we would propose that the implementation date is delayed in the same manner.	Thank you for your comments.

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Norther Power Grid (Distribution Network Operator)	N/A	N/A
SP Energy Networks (Distribution Network Operator)	Yes, we believe that this is an appropriate implementation date (if not before). SPEN believe that this should give sufficient time for parties to make any changes to their internal processes to accommodate the solution	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	We will require a suitable period of time to ensure that systems and processes are updated to allow us to successfully deliver this change, for which we believe that 9 months will be sufficient.	Thank you for your comments.

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Question 8:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
British Gas (Energy Supplier)	**Position: We support R0321 and believe it will deliver operational efficiencies by simplifying the Export MPAN creation process and reducing unnecessary supplier administration**. During our review of the proposal, we noted the recent introduction of Plug-in Solar arrangements under G98 and believe it would be beneficial to understand how these arrangements are expected to interact with the proposed Export MPAN creation process. In particular, we would welcome clarification on: • whether Plug-in Micro-generator notifications (including Form B2 and Connect Direct submissions) are intended to fall within scope; • what constitutes the relevant DNO trigger within a customer-led notification process; • whether all valid Plug-in Solar notifications are expected to result in an Export MPAN being created; and • how associated Export MPANs would be treated where a Plug-in Micro-generator is subsequently removed. We do not consider these points to be barriers to implementation. Rather, they represent areas where additional clarification may assist industry participants in understanding the end-to-end process.	Thank you for your comments. We note that new technologies, including plug-in solar, continue to develop and enter the Export market. We plan to monitor this as part of benefits realisation post implementation. This will include establishing if plug-in solar has been installed within the scope of the G98/99 arrangements. More generally, REC is also looking at plug-in solar to understand what, if any implications there are on the wider REC, not just as part of this CP. We note that the Electricity Supplier led requests via SDES remain as a process if plug-in solar is not part of the G98/99 arrangements.

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	Recommendation: The Code Manager should consider whether any guidance or clarification is required regarding the interaction between R0321 and the recently approved Plug-in Solar arrangements.	
National Grid Electricity Distribution (Distribution Network Operator)	If there is a shift in process for developers/installers, i.e the process for how they currently request export MPANs is changing, how will this be communicated? Will guidance be provided to alleviate any potential confusion?	Thank you for your comments. There is no change to the process of how developers/ installers request MPANs and it remains the same as it is today.
Norther Power Grid (Distribution Network Operator)	N/A	N/A
SP Energy Networks (Distribution Network Operator)	No further comments.	Thank you.
UK Power Networks (Distribution Network Operator)	No.	Thank you.

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