RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0328 REMOVAL OF D0383 & D0384 REQUIREMENTS FROM SHARING MTDS PROCESS

On 14 August 2026 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0328 Removal of D0383 & D0384 requirements from Sharing MTDs process.

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	08 September 2026
RESPONSIBLE COMMITTEE	Metering Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE CONSULTATION ISSUED	14 August 2026
RESPONSE DEADLINE	07 September 2026

Question 1:	Do you have any comments on the proposed solution or legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	We are supportive of this change to align the schedules to the processes correctly.	Thank you for your comments.
Stark Energy Services (Metering Equipment Manager)	No	Thank you for your confirmation.
SMS (Metering Equipment Manager)	We have no comments to add.	Thank you for your confirmation.
SSE Energy Supply (Energy Supplier)	SSE supports the proposed solution to rectify the issue created following MHHS.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	No comments.	Thank you for your confirmation.
British Gas (Energy Supplier)	**Position: Support** We support the proposed solution. The change appears to correct an inconsistency between REC Schedules 14 and 34 and the underlying MHHS market message design by removing obligations that were introduced in error and cannot currently be fulfilled. The proposal improves clarity by aligning the REC with existing market processes and message flows.	Thank you for your comments.

	From an operational and industry process perspective, we consider the proposed approach to be reasonable and proportionate. We have no further comments on the proposed legal text. The proposed solution removes unnecessary obligations without introducing new requirements, system changes or additional market processes.	

Question 2:	Do you agree with the proposed implementation approach (Big Bang)? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we are supportive of this big bang approach.	Thank you for your comments.
Stark Energy Services (Metering Equipment Manager)	Yes	Thank you for your comments.
SMS (Metering Equipment Manager)	Yes, we agree with the proposed implementation approach.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree that the big bang implementation approach is suitable for this change.	Thank you for your comments.
British Gas (Energy Supplier)	**Position: Agree** We agree with the proposed Big Bang implementation approach. The change is a clarification and correction of existing obligations rather than the introduction of new market processes or system functionality. Given the limited scope of the proposal and the absence of identified system impacts, a Big Bang implementation appears proportionate and appropriate.	Thank you for your comments.

Question 3:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	Yes.	Thank you for your comments.
Stark Energy Services (Metering Equipment Manager)	Yes	Thank you for your comments.
SMS (Metering Equipment Manager)	Yes, we agree with the Code Manager's assessment of the costs and benefits for this change.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Thank you for your comments.
British Gas (Energy Supplier)	**Position: Agree** We agree with the Code Manager's assessment of the costs and benefits for this Change Proposal. Based on the information provided, the proposal corrects obligations that were introduced in error and aligns REC Schedules 14 and 34 with the existing market message framework. The proposal does not introduce new obligations, central system changes or operational	Thank you for your comments.

	processes. We therefore agree that no material implementation costs are anticipated. We also agree that the primary benefits are: • Removal of obligations that are not required and cannot currently be fulfilled. • Improved alignment between REC documentation and the Energy Market Data Specification (EMDS). • Increased clarity regarding when D0383 and D0384 messages are required and which parties should receive them. We therefore support the Code Manager's conclusion that there is a positive case for change.	

Question 4:	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 Metering Expert Panel?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we believe that this should be self governance.	Thank you for your comments.
Stark Energy Services (Metering Equipment Manager)	Yes	Thank you for your comments.
SMS (Metering Equipment Manager)	Yes, we agree this Change Proposal should be subject to Self-Governance approval by the Metering Expert Panel	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree that R0328 should be subject to Self-Governance approval.	Thank you for your comments.
British Gas (Energy Supplier)	**Position: Agree** We agree that Self-Governance is the appropriate Change Path. The proposal appears to correct drafting errors and align REC obligations with established market arrangements. The change does not appear to introduce new policy, alter market outcomes, or create material impacts for consumers or REC Parties. On that basis, we agree that Self-Governance is appropriate	Thank you for your comments.

Question 5:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 06 November 2026? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	Yes, we believe that it is important to ensure that the documentation accurately reflects the process and that any ambiguity is removed at the earliest opportunity.	Thank you for your comments.
Stark Energy Services (Metering Equipment Manager)	Yes	Thank you for your comments.
SMS (Metering Equipment Manager)	Yes, we agree with the implementation date of 06/11/2026	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	This should be implemented at the earliest opportunity.	Thank you for your comments.
National Grid Electricity Distribution (Distribution Network Operator)	Yes, this implementation date seems sensible.	Thank you for your comments.
British Gas (Energy Supplier)	**Position: Agree** We agree with the recommended implementation date of 06 November 2026. Given the limited scope of the proposal and the absence of identified implementation impacts, we do not consider there to be any reason to delay implementation. Early alignment of the REC documentation with	Thank you for your comments.

	the existing market message design will help remove ambiguity and improve clarity for affected parties.	

Question 6:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks (Distribution Network Operator)	No additional comments.	n/a
Stark Energy Services (Metering Equipment Manager)	We are already compliant with R0328, so this change will not affect us.	Thank you for your comments.
SMS (Metering Equipment Manager)	N/A	n/a
SSE Energy Supply (Energy Supplier)	No.	n/a
National Grid Electricity Distribution (Distribution Network Operator)	We would like to note, although the Change Report states that the incorrect additions are impossible to fulfil as the relevant Scenario Variants do not exist, we (Role Code R) have received 27 x D0384's from two MPIDS with Role Code T in the last 2-3 months. It is correct that there is no Scenario Variant within the EMDS that would allow the D0384 to be sent from Role Code T to Role Code R, so we are not sure how this has been happening. We are hoping that the implementation of this change will alleviate the unexpected receipt of these D0384's, however we would question whether the method in which these messages were sent requires any further investigation.	Thank you for your comments. This question should be raised directly to ElectraLink as the body responsible for the Data Transfer Service Agreement (DTSA).

British Gas (Energy Supplier)	**Position: No further comments** The proposal represents a sensible correction to REC obligations and helps ensure the REC remains aligned with the underlying MHHS message framework.	n/a