RETAIL ENERGY CODE

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POSITION ON MPAN DATA CLASSIFICATION

1 PURPOSE

This paper sets out the Code Manager's position on the classification and handling of Meter Point Administration Numbers (MPANs) under UK data protection legislation, reflecting established ICO guidance and sector wide regulatory interpretations. It provides clarity for Parties submitting data to Code Manager services and ensures alignment with obligations arising from the UK GDPR, Data Protection Act 2018, and relevant electricity market governance frameworks.

2 REGULATORY CONTEXT AND ICO BASIS

The UK GDPR defines personal data as information relating to an identified or identifiable natural person, including identification numbers and data enabling organisations to single out an individual. MPANs identify specific metering points, and when processed in a way that links them to a resident or enables decisions affecting that resident, they meet the ICO test for relating to an individual. This includes indirect identifiability where the data allows a Party to determine billing, consumption, or other actions materially affecting a consumer.

3 SECTOR PRACTICE AND PRECEDENT

Across GB energy governance, MPAN related data is consistently treated as personal data where it forms part of settlement, billing, assurance, or regulatory processes:

- Under Market-wide Half Hourly Settlement, Ofgem requires Suppliers and Distribution Network Operators to submit personal data including MPAN core, MPAN address, and meter identifiers into BSC central systems.
- DESNZ classifies MPANs as personal data within statutory schemes such as the Energy Price Guarantee, alongside consumption and meter related data.
- Historic ICO interpretations within industry consultations confirm that MPANs are likely to be personal data because they enable targeted decisions affecting residents at a specific property, even without an associated customer name.

These positions are now embedded in guidance on Relevant Personal Data, which includes MPAN core information, where linked to domestic or microbusiness consumption.

4 CODE MANAGER POSITION

The Code Manager therefore adopts the following interpretation for Code processes:

MPANs constitute personal data when:

- They are used within processes that relate to an identifiable customer (e.g., settlement, billing, query resolution, data assurance);
- They are combined with other attributes such as meter address, consumption, or tariff information;

- Their processing results in decisions or actions that directly affect the resident of a premises.

MPANs may be non-personal data only where:

- They are processed solely for engineering or asset management purposes with no intention or effect of identifying or acting upon a natural person;
- They are held in isolation without accompanying data that could identify or target a resident.

In practice, most Code related uses fall within the first category (MPANs constitute personal data).

5 DATA HANDLING REQUIREMENTS

Given their personal data status in Code processes:

- MPAN data must not be transmitted via email to the Code Manager or any service provider unless explicitly permitted and with appropriate security controls.
- Parties must instead use the REC Portal or other approved secure interfaces for submitting MPAN related data.
- All submissions must comply with UK GDPR principles including purpose limitation, data minimisation, and security of processing.
- Parties remain responsible for establishing whether they act as controllers or processors when handling MPAN data for Code purposes, consistent with BSC definitions.

6 SUMMARY

MPANs are treated as personal data for the purposes of Code related processing due to their ability to single out an identifiable individual through the property they relate to and the decisions that arise from their use. Accordingly, Parties must apply personal data handling standards and use secure Code mandated systems when submitting MPAN information.