RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	**Consultation**
04	Final Recommendation

CHANGE REPORT

R0235 MISSING SCENARIO VARIANTS IN D0179

R0235A MISSING SCENARIO VARIANTS IN D0179 ALTERNATE SOLUTION

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	27 February 2026
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Change Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	Medium	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	DNOs, MOAs, Energy Suppliers		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	SUBJECT MATTER EXPERT
CAROLINE FREIMULLER	SOPHIA LOGIE	HELEN FOSBERRY
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OVERVIEW

There are two missing Scenario Variants in the Data Specification for sending/receiving the Confirmation of Energisation/De'-'Energisation of Prepayment Meter (D0179 / MM00093). The Code Manager is also investigating whether three mandatory Data Items should potentially be optional.

The alternate solution proposes the removal of the D0179 and that the Confirmation or Rejection of Energisation Status Change (D0139 / MM00036) should be send in all scenarios.

CODE MANAGER MINDED TO POSITION

The Code Manager recommends that the REC Change Panel:

- **APPROVE** the proposed change solution for **R0235A**, and **REJECT R0235**;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 27 February 2025.

RETAIL ENERGY CODE

CONTENTS

Code Manager Minded To Position 2
1 Summary 4
2 Problem Statement 4
3 Impacts 5
4 Cross-Code Impacts 5
5 Proposal plan 5
6 Stakeholder Engagement 6
7 Priority Status and Urgency 6
8 Summary of Analysis Undertaken 7
9 Proposed Solution – R0235 7
10 Proposed solution – R0235A 10
11 Draft Legal Text 10
12 Summary of Impact Assessment Activity 11
13 Risks, Assumptions, Issues and Dependencies 12
14 Business Case Assessment 12
15 Case for Change 13
16 Appendix 15
17 Glossary 15

BACKGROUND

1 SUMMARY

The legal text in REC Schedule 14 Metering Operations specifies that the Confirmation of Energisation/De'-'Energisation of Prepayment Meter Market Message (D0179 / MM00093) should be sent:

- From the Distribution Network Operator (DNO) to the Electricity Supplier;
- From the Meter Operator Agent (MOA) to the Electricity Supplier;
- From the DNO to the MOA; and
- From the MOA to the DNO.

The Scenario Variants from DNO to MOA and from MOA to DNO are missing from the Data Specification.

There are also Scenario Variants missing from the MHHS Data Specification, for the Smart Metering Service.

There are also three Data Items which are listed as mandatory within the D0179, which the Proposer of this change has suggested should be changed to optional as the DNO and MOA may not have the information to populate these fields. These are:

- Credit Balance (DI50260/J0537);
- Standing Charge (DI50264/J0543); and
- Prepayment Unit Rate (DI50263/J0542).

Following feedback received at Party impact assessment and from the REC Change Issues Group, an alternate solution (R0235A) has been raised which proposes the removal of the D0179 from REC legal text. It proposes instead that the Confirmation or Rejection of Energisation Status Change (D0139 / MM00036) should be used in all scenarios, replacing the obligation to send the D0179 on traditional Prepayment Meters.

2 PROBLEM STATEMENT

DNOs and MOAs cannot fulfil their full obligations listed in Schedule 14 Metering Operations as there missing Scenario Variants in the Data Specification preventing them from sending the D0179 to all required Parties.

3 IMPACTS

REC PARTIES AND SERVICE USERS
DNOs
MOAs
Energy Suppliers

REC DOCUMENTS / PRODUCTS
Data Specification (R0235)
Schedule 14 Metering Operations (R0235A)

MHHS DESIGN
No impact

MHHS DATA SPECIFICATION
Impact (R0235)

MHHS CODE DRAFTING
Impact (R0235A)

It has also been identified that these Scenario Variants are missing from the MHHS Data Specification, so the Code Manager will need to ensure this change is maintained post MHHS. There are also additional Scenario Variants required for MHHS, which the Code Manager is including as part of this change. It will be assessed how and when is best to implement these.

For R0235A, there will be changes required to REC Schedule 14 Metering Operations. This will make changes to the current MHHS code drafting.

4 CROSS-CODE IMPACTS

There are no cross-code impacts associated with R0235. R0235A may require a cross-code change with the Balancing and Settlement Code (BSC) due to the D0179 being mandated in BSCP515 Licensed Distribution. This has been raised at the Cross Code Steering Group (CCSG).

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**14 Jan 25**	**30 Apr 25**
	Code Manager Assessment	January	February
	Solution Refinement	February	March
	Change Issues Group	March	March
	Impact Assessment	March	April
Change Proposal		**01 May 25**	**30 Jun 25**
	Business Case Assessment	April	May
	Consultation	May	June
	Final Determination	June	June
Voting		**01 Jul 25**	**01 Jul 25**
	Appeal Window	02/07/2025	16/07/2025

The previous Change Plan has the REC Technical Expert Panel (TEP) as the responsible committee and had the voting window milestone as 25 June 2025.

The Code Manager is proposing to make Change Panel the responsible committee, as R0235 should have TEP as the responsible committee and R0235A should have the REC Metering Expert Panel (MEP) as the responsible committee. In scenarios where REC products have multiple responsible owners in Baseline Statement, Schedule 5 Change Management states Change Panel will be the responsible committee.

We are also proposing to amend the voting milestone to 01 July 2025 as the nearest Change Panel date to the original milestone.

6 STAKEHOLDER ENGAGEMENT

The Code Manager presented this change at the March Change Issues Group to investigate the need and impact of moving the three Data Items from mandatory to optional. The questions asked of the group included:

- For DNOs/MOAs – how are these Data Items populated now? Both should already send this flow to the Electricity Supplier and these Data Items are mandatory.
- For Electricity Suppliers – do you predict any impacts to your business if these Data Items were no longer populated by DNOs/MOAs?

These questions were also asked at Party impact assessment, but the Code Manager wants to ensure maximum engagement and feedback before arriving at a conclusion.

Following feedback received at Party impact assessment and from the REC Change Issues Group, an alternate solution (R0235A) has been raised which proposes the removal of the D0179 from REC legal text. It proposes instead that the D0139 should be used in all scenarios.

The May 2025 Change Issues Group meeting indicated a strong preference for the Code Manager to raise the alternate, so that Parties were able to consult on both solution options.

7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	1	27	27
	Retail Markets Impact	Innovation and Market Arrangements	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	7	7
		Legal and Regulatory Compliance	3	14	43
Resource	Complexity / Effort / Duration		3	9	28
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	0	10	0
				Overall Priority Score (rounded)	120

Priority Status	MEDIUM
Change Proposal Type	STANDARD

RETAIL ENERGY CODE

SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

R0235 was first presented at the March Change Issues Group, where several Energy Suppliers, MOAs and DNOs all confirmed they do not send/receive the D0179 but instead use the D0139.

The Code Manager received confirmation from the Data Transfer Network (DTN) that the number of D0179s being sent is indeed very low, with only 22 being sent by DNOs and 258 by MOAs between 01 January 2024 and 11 March 2025.

Data cannot be gathered centrally on the number of D0139s being sent on traditional Prepayment Meters as the DTN cannot see meter types. However, the Code Manager will ask this question of Parties at consultation.

9 PROPOSED SOLUTION – R0235

The proposed solution for R0235 is below. Based on feedback from the REC Change Issues Group, Party impact assessment and the REC Change Panel, the Code Manager has proposed the below 3 data items move from mandatory to conditional.

- Credit Balance (DI50260/J0537);
- Standing Charge (DI50264/J0543); and
- Prepayment Unit Rate (DI50263/J0542).

MM00093 - Confirmation of Energisation/De'-'Energisation of Prepayment Meter - Message Structure

Scenario Variants

Scenario Variant	Name	Source	Target	Owner	Api Route	Api Method
SV00093	Confirmation of Energisation/De'-'Energisation of Prepayment Meter	Distribution Network Operator	Electricity Supplier	Retail Energy Code Company		
SVAAAAA	Confirmation of Energisation/De'-'Energisation of Prepayment Meter	Distribution Network Operator	Electricity Meter Equipment Manager	Retail Energy Code Company		
SVBBBBB	Confirmation of Energisation/De'-'Energisation of Prepayment Meter	Distribution Network Operator	Electricity Smart Meter Equipment Manager	Retail Energy Code Company		
SV00094	Confirmation of Energisation/De'-	Electricity Meter	Electricity Supplier	Retail Energy		

	'Energisation of Prepayment Meter	Equipment Manager		Code Company		
SVCCCCC	Confirmation of Energisation/De-'Energisation of Prepayment Meter	Electricity Meter Equipment Manager	Distribution Network Operator	Retail Energy Code Company		
SVDDDDD	Confirmation of Energisation/De-'Energisation of Prepayment Meter	Electricity Smart Meter Equipment Manager	Distribution Network Operator	Retail Energy Code Company		

- **Data Items**

Data Item Number	Local Catalogue Reference	Name
DI50003	J0003	MPAN Core
DI50004	J0004	Meter Id (Serial Number)
DI50007	J0010	Meter Register Id
DI50008	J0012	Additional Information
DI50009	J0014	Date of Action
DI50016	J0024	Site Visit Check Code
DI50019	J0040	Register Reading
DI50041	J0080	Energisation Status
DI50098	J0173	Reason for Request
DI50260	J0537	Credit Balance
DI50261	J0539	Total Credit Accepted
DI50262	J0540	Total Tokens Inserted
DI50263	J0542	Prepayment Unit Rate
DI50264	J0543	Standing Charge
DI50265	J0544	Total Debt Outstanding
DI50266	J0545	Emergency Credit Status
DI50267	J0547	Debt Recovery Rate
DI50317	J0685	Tariff Code
DI50320	J0691	Failure Reason Code
DI50476	J1022	Prepayment Meter Shutdown Status

- **Flow Structure**

Group ID	Group Description	Range	Condition	L1	L2	L3	L4	L5	L6	L7	L8	Data Item Name	Data Item Rule	Data Item Alternate Name
368	MPAN Cores	1-*		G										
					1							MPAN Core		

					O						Site Visit Check Code		
					O						Additional Information		
					O						Failure Reason Code		
			Tariff Code is Mandatory within a message generated for a Token Meter or a Smart Card Meter, or Optional for any other meter type.		C						Tariff Code		
369	Meters Details per MPAN Core	1-*			G								
						1					Meter Id (Serial Number)		
						1					Energisation Status		
						1					Prepayment Meter Shutdown Status		
						1					Reason for Request		
						1					Date of Action		
			Credit Balance must be provided if the information is held.			~~1~~C					Credit Balance		
						O					Total Credit Accepted		
						O					Total Tokens Inserted		
						O					Emergency Credit Status		

						O						Total Debt Outstanding		
						O						Debt Recovery Rate		
			Standing Charge must be provided if the information is held.			~~1~~C						Standing Charge		
370	Register Detail per Meter	1-*				G								
							1					Meter Register Id		
							1					Register Reading		
			Prepayment Unit Rate must be provided if the information is held.				~~1~~C					Prepayment Unit Rate		

10 PROPOSED SOLUTION – R0235A

The proposed solution for R0235A is the removal of the D0179 from Schedule 14 Metering Operations, and proposing the D0139 is used for all meter types.

11 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0235 can be found here.

The legal text changes to deliver the proposed solution to R0235A are available in both the current version of Schedule 14 Metering Operations here, and in the MHHS version of Schedule 14 Metering Operations here.

RETAIL ENERGY CODE

PRELIMINARY ASSESSMENT

12 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

12.1 SERVICE PROVIDER IMPACT ASSESSMENTS

No Service Provider impact assessment was required as part of this Change.

12.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was conducted from 06 to 28 March 2025. A total of three responses were received from two DNOs and one Energy Supplier. The responses have been published here.

Only the R0235 solution underwent Party impact assessment, as R0235A was raised following the feedback at impact assessment and Change Issues Group.

ENERGY SUPPLIERS	• The Energy Supplier agreed with the proposal to add Scenario Variants into the Data Specification but disagreed that the three Data Items should be made optional. They instead recommended the Data Items be made conditional, where they are optional between DNOs and MOAs but mandatory when sending to Energy Suppliers. The Code Manager has amended the proposed solution to propose they are conditional and must be populated when the information is held by the sending Party. • The Energy Supplier confirmed they have only received one D0179 within the past year. • The Energy Supplier confirmed they thought the D0235 solution appropriately accounted for the industry move to MHHS. • The Energy Supplier confirmed that for the R0235 solution, they would like this to be implemented in the REC February 2026 release after MHHS go-live. • The Energy Supplier confirmed that for the R0235 solution, they expected their costs for implementation to be less than £10,000. • The Energy Supplier confirmed they saw no benefits to their business from the implementation of the R0235 solution.
DISTRIBUTION NETWORK OPERATORS	• Both DNOs disagreed that the Scenario Variants should be added into the Data Specification, and instead thought the legal text should be amended to remove these Scenario Variants. Both raised that the DNO to MOA Scenario Variant in particular was removed as part of a historic MRA change. • Both DNOs confirmed they have sent 0 D0179s in the past year. • Both DNOs confirmed they thought the MHHS arrangements should be amended to remove these Scenario Variants. One called out that as traditional Prepayment Meters should become less common due to the Smart Meter rollout, they did not see a requirement for these Scenario Variants under MHHS.

	• One DNO did not provide estimated lead time for implementation for the R0235, the other confirmed they would require a minimum of six months. • One DNO did not provide estimated cost for implementation for the R0235, the other confirmed they expected this to be in the range of £10,000 to £50,000. • Neither DNO saw any benefits to their business from the implementation of the R0235 solution.

13 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

13.1 RISKS AND ISSUES

No risks or issues have been identified as part of this Change Proposal.

13.2 ASSUMPTIONS AND DEPENDENCIES

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
R0235.A01	Removal of the D0179 would have no impact to Energy Suppliers business operations.	Some Energy Suppliers have confirmed that they already receive the D0139 from DNOs and MOAs on traditional Prepayment Meters, rather than the D0179.	This will be validated at consultation and will feed into the Code Manager's final recommendation.
R0235.A02	The R0235A solution would have minimal costs to Parties.	Parties' systems should already be configured to send and receive the D0139 as required.	This will be validated at consultation and will feed into the Code Manager's final recommendation.

14 BUSINESS CASE ASSESSMENT

14.1 COSTS

For both the R0235 and R0235A solutions, there are no central system costs.

For the R0235 solution, the one Energy Supplier who responded to the Party impact assessment confirmed they foresaw costs of less than £10,000 to configure their system to have the three data items (Credit Balance (DI50260/J0537), Standing Charge (DI50264/J0543) and Prepayment Unit Rate (DI50263/J0542)) as conditional rather than mandatory. The one DNO who responded to this question expected a cost in the range of £10,000 to £50,000.

While the R0235A has not gone through Party impact assessment, the Code Manager would expect minimal costs to Parties as their systems should already be configured to send and receive the D0139 Market Message. This will be validated at consultation.

14.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
ALLOW DNOS AND MOAS TO BE FULLY COMPLIANT WITH SCHEDULE 14 METERING OPERATIONS	The implementation of either the R0235 or R0235A solution will allow DNOs and MOAs to be fully compliant with Schedule 14 Metering Operations.
INCREASE EFFICIENCY IN THE RETAIL ENERGY MARKET	The REC mission statement is to "facilitate the efficient and effective running of the retail energy market, including its systems and processes...through promoting innovation, competition, and delivering positive customer outcomes." The Code Manager believes that R0235A achieves this better than R0235 as it: • does not reintroduce Scenario Variants that have been removed under previous changes; • brings the REC legal text in line with the way Parties are already operating; • removes redundancy as having a specific flow for traditional Prepayment Meters with extra items that are not being used is not efficient; and • future proofs the legal text for the expected decline in traditional Prepayment Meters.

14.3 COST BENEFIT ANALYSIS

The Code Manager believes there is a positive case for change for both the R0235 and R0235A solutions, but that R0235A has a stronger case for change.

There are no central systems costs associated with either change and likely Party implementation costs associated with both Changes. However, the Code Manager believes that R0235A will have lower implementation costs compared with R0235.

There are two intangible benefits associated with R0235A, but only one with R0235.

15 CASE FOR CHANGE

The Code Manager believes there is a positive case for change for both the R0235 and R0235A solutions, but that R0235A has a stronger case for change. This is on the basis that:

- Both solutions resolve the problem statement;

- Both solutions have no central system costs and has proportionate effort required for implementation;
- Both solutions have implementation costs associated to Parties, but the Code Manager believes that R0235A will have lower costs compared with R0235;
- Both solutions allow DNOs and MOAs to be fully compliant with Schedule 14 Metering Operations; and
- The R0235A solution only increases efficiency within the retail energy market as laid out in section 14.2 of this report.

16 APPENDIX

CHANGE PROPOSAL	R0235 R0235A
LEGAL DRAFTING	R0235 R0235A – current Schedule 14 R0235A – MHHS Schedule 14
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link

17 GLOSSARY

TERM	DEFINITION
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
Data Specification	means the document of that name forming part of the Technical Specification
Distribution Network Operator (DNO	means a person holding an Electricity Distribution Licence.
Meter Operator Agent (MOA)	means a Party which has Qualified in that role under the Qualification and Maintenance Schedule. Where used in respect of a particular Metering Point, it means the MOA Appointed by an Electricity Supplier in accordance with the Metering Operations Schedule. The MOA is accountable for the installation, replacement, repair and maintenance of electricity Metering Equipment (either itself or by an EMO), and the MOA must also therefore be Accredited under the Metering Accreditation Schedule.