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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

MHHS METERING GUIDANCE DOCUMENTS

On 13 June 2025 the Code Manager issued a consultation to industry to seek feedback on the following new metering guidance documents created to support Parties with understanding systems and processes updated for the new Market-wide Half Hourly Settlement (MHHS) arrangements:

- Sharing Metering Asset Data - Guidance Document
- Change of Market Segment - Guidance Document

It is proposed that the new guidance documents will be added to the REC as Category 3 documents under the responsibility of the Metering Expert Panel.

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	1.0
RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	02/07/2025
RESPONSIBLE COMMITTEE	Metering Expert Panel
LEAD ANALYST	Harriet Truss

DATE CONSULTATION ISSUED	13/06/2025
RESPONSE DEADLINE	30/06/2025

Question 1:	DO YOU HAVE ANY COMMENTS ON THE PROPOSED 'SHARING METERING ASSET DATA - GUIDANCE DOCUMENT'?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Please see our comments below regarding the "Sharing Metering Asset Data – Guidance Document": Page 4 - Where "Fault Resolution" is listed as a bullet under current processes for Non MHHS Metering Points, this should specify the type of updates included such as change in comms method or comms number. This will make the detail clearer for users. Page 4 - We recommend adding an explanation for the D0313 flow listed to detail when this would be used and who it is sent to. The document has included this information for all other flows listed; this ensures completeness of information. Page 5 - Can you include a link to the "D0268 Population Rules document" for ease. *Page 6 - "The SMRS validates the IF005 and where validation is successful, MTDs are shared with other Market Participants via the IF006",* can you clarify in the document who the market participants are that the MTDs are shared with? Page 7 - *"Within 3 Working Days following metering activity",* can you clarify in the document what is meant by metering activity? Does this	Thank you for your response. Each point has been considered as follows: Page 4, Fault Resolution – the list used here is included according to the sections in Schedule 14 – Metering Operations and expansion on only one of the processes listed does not seem appropriate. The Code Manager will consider whether further expansion on 'fault resolution' is required within the guidance as an item for continuous improvement. Page 4, D0313 – information has been added to the guidance document as follows: 'for auxiliary MTDs related to Advanced meters not included in the D0149 / D0150 flows' Page 5, D0268 document – reference to this document has been removed for the initial

	refer to on site work such as new installs and meter exchanges? Does this apply to remote comms changes?	version of the guidance, as it is not yet ready for publication. Page 6, IF006 recipients – information has been added to the guidance document as follows: 'Depending on the event that the IF005 is being used for the IF006 is shared with the appointed MOA, Data Service and Smart Meter Data Retriever, Supplier, DNO and the Electricity Enquiry Service. Details of the recipients for each scenario variant are included in EMDS.' Page 7 , 'metering activity' - in this guidance 'metering works' is primarily intended to refer to metering work on site. However, the scenario of updates to remote comms would require the D0268 to be sent, although the IF005 would not be required. A small adjustment has been made to the guidance in this section 'MHHS SLAs for sharing MTDs' and an additional FAQ has been added.
EDF Energy Customers Ltd. (Energy Supplier)	We don't have any comments on the content of the 'Sharing Metering Asset Data - Guidance Document'	Noted – thank you.
IMServ Europe Ltd (Metering Equipment Manager (MEM))	Section - Metering Related DIP Market Messages for MHHS Metering Points – This section highlights the IF036 but does not include the	Thank you for the response.

	IF033 which has much of the same metering information, should this be added?	As the IF033 is part of the appointment process rather than for sharing MTDs it has not been included in this guidance. A separate MOA Appointment guidance note is being developed where the IF033 is included.
National Grid Electricity Distribution (Distribution Network Operator (DNO))	Currently we have no further comments to add in relation to the 'Sharing Metering Asset Data' guidance document. This has been passed over to our technical team who will review this in greater detail.	Thank you for the initial response. The Code Manager will remain open to feedback on these documents and where material changes or improvements to the document are identified, updates to the document will be progressed via the Category 3 Change process.

Question 2:	DO YOU AGREE WITH THE PROPOSED APPROACH TO ADD THE 'SHARING METERING ASSET DATA - GUIDANCE DOCUMENT' TO THE REC AS A CATEGORY 3 DOCUMENT UNDER THE RESPONSIBILITY OF THE METERING EXPERT PANEL?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes, we agree with this approach.	Noted - thank you.
EDF Energy Customers Ltd. (Energy Supplier)	We agree that the 'Sharing Metering Asset Data - Guidance Document' should be added to the REC as a Category 3 document under the responsibility of the Metering Expert Panel. The new MHHS arrangements are complex and the transition to them is likely to result in numerous errors, especially where there isn't a common understanding	Noted - thank you.

	of how the new processes and messages should work. Anything that helps people to understand the new processes can only be useful, and should help to reduce errors during the transition period and beyond.	
IMServ Europe Ltd (MEM)	No response included.	n/a
National Grid Electricity Distribution (DNO)	Yes, we are happy to agree with the proposed approach to add the 'Sharing Metering Asset Data' guidance document to the REC as a Category 3 document. This is being looked into further by our technical team who will report back to us with any findings.	Noted - thank you.

Question 3:	DO YOU HAVE ANY COMMENTS ON THE PROPOSED 'CHANGE OF MARKET SEGMENT - GUIDANCE DOCUMENT'?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Please see our comments below for the Change of Market Segment – Guidance Document: Page 4 – The process MAP includes communication between Supplier and LDSO via e-mail, this should be via SDEP, not e-mail. If the supplier wants the connection type changed the communication should be via SDEP. The MPAN is considered personal information and comes under GDPR, therefore email is not a secure method of communication.	Thank you for your response. Each point has been considered as follows: Page 4, communication method - There is no requirement to use Secure Data Exchange Portal (SDEP) for this within the MHHS design, and no SDEP message been created to accommodate this. If required, an SDEP mechanism could be added via a REC

	Page 4 - The first step of the process MAP needs to be amended. We have continuously fedback during MHHS programme calls that Suppliers are not responsible for planning a change of connection type with the customer, prior to requirement of a change of meter. Whilst some Suppliers may offer this as a service, it is not standard industry practice or requirement in code. Step 1 for a change of connection type should be within the LDSO swim lane to agree with the customer what supply is required. Page 5 - Following on from our previous comment, the change of connection type is agreed between the customer/owner of the site and the LDSO. In our experience LDSO's are not always explicit to customers about contacting their Supplier to agree the meter work, this can lead to customers approaching their Supplier giving them short notice that they have agreed a supply change with DNO and require a change of meter on a given date. The Supplier will then approach the appointed MOA to try and meet that date which has already been agreed between the customer and their LDSO. Page 8 - We are working with a Metering Service provider who has a different MPID for their Smart and Advanced market segments. For this scenario, a full change of agent will need to be carried with an effective date that is prior to the date of the metering work to enable the new install to be scheduled by the correct Metering Service provider MPID. E.g. 'Meter Operator A' services both Smart and Advanced meters, but they have different Contract IDs/MPID for their Smart and Advanced market segment. A supply is changing from W/C to CT, so we send a Metering Services appointment type SEG prior to the work, for an effective date for their Advance MPID set for the date of the metering work. If the DNO and customer change the date of that work, we'd have	Change. The opportunity has been taken, however, to align the wording with that used in BSCP705. Page 4, change of connection responsibilities - The process diagram will be updated to remove the indication that the Supplier is responsible for these instances. The Code Manager notes that step 1 reflected what is captured in the BSC and advise that a change should be raised to amend BSCP705 to address this issue. Page 5, Supplier notice – This is an existing issue and may require a change to the existing process to ensure the Supplier is informed of the agreed work. This process is not governed by the REC and should be progressed with the BSC and/or DCUSA. No amendment has been made to the guidance document. Page 8, - The point raised reflects the MHHS design and the guidance has been drafted on this basis, allowing for the scenario where there are two different MOAs and where necessary a cancellation to the MOA Appointment due to the effective from date not being met.

	to cancel that and send a new MS appointment for the new date. On date of exchange, the Advanced Metering Services provider is appointed. In addition to the above suggested amendments, this document should also cover a scenario where Supplier arranges an install for either a smart/advanced meter and sets the appropriate market segment, but when the engineer arrives on site, they need to install a different meter type than what has been requested. This scenario will require a retrospective SEG change of agent and change of market segment. We raised this on a previous call with Elexon, and they confirmed this process would work, but it has not been mentioned in either the new connection processes or this document. We also have a question regarding a change of market segment/connection type that may be required for new connections prior to registration of the MPAN. If the MPAN has not been registered yet and the supplier does not agree with the connection type value in EES (set by DNO) can or should this be changed prior to registration of the MPAN? The guidance document does not cover this scenario, and we recommend that the market segment/connection type can be amended via a request to DNO (via SDEP) and changed via DB02. An example of this would be e.g. domestic new build housing estate and MPANs all set to "L" (LV Current Transformer). We currently have over 1000 MPANs in this position that require an update from DNO. How would a dispute between a Supplier and LDSO regarding the correct market segment and connection type be resolved. Is it the responsibility of the Supplier to arrange a site visit to confirm if there is CT equipment on site, or would this responsibility sit with the LDSO. The process map covers the Supplier requesting the change but	No amendment has been made to the guidance document. Additional scenario – As the type of MOA appointed should dictate the meter installed, we believe this would be a very rare event. As such we don't believe an update to the guidance is required New connections – This question needs to be explored through the change process rather than there being a clear direction in the MHHS Design. As this is primarily a BSC issue – with no meter and no MOA, it is out of the REC's scope – it could be taken to Elexon's MHHS Expert Group, which meets on the third Thursday each month. No amendment has been made to the guidance document. Supplier/DNO disputes – The question raised is out of scope of this guidance document. Similarly to the above question, we suggest this is taken to Elexon's MHHS Expert Group. No amendment has been made to the guidance document.

	doesn't include a decision point for LDSO and what happens if they reject the request. This should be included to understand what action the LDSO will take when they reject a request.	A clarification on the scope of the guidance document has been added at the start of the document.
EDF Energy Customers Ltd. (Energy Supplier)	Yes. **<u>Agreeing works</u>** We disagree with the following text on page 5 and specifically the sentence highlighted in yellow, which is then repeated (in slightly different formats) throughout the document: *The steps within the change of Market Segment process are:* *Nature of work and target work date are agreed between the Supplier, DNO (if a change of Connection Type is required), and MOA.* *Supplier puts in place a 'Prospective' MOA and Data Service Appointment based on the expected Market Segment for the new metering:* This is not an accurate reflection of how this works in practice. In many scenarios, the customer will identify their need for a larger supply of electricity and/or meter, they will either contact their Supplier or DNO; contacting the Supplier will just direct them towards the DNO. It's the customer and DNO who need to agree a works date and most importantly, the customer needs to pay the DNO for the services supplied (design & job costs + VAT). The supplier just needs to request the DNO to attend site via the D0142 with the appropriate lead times for the date on or after when the supply upgrade has occurred.	Thank you for the response. Each point has been considered as follows: <u>Agreeing works</u> – As noted against the Centrica response above, an update will be made to the process diagram regarding the agreement and responsibilities in relation to change of connection type. The described process in section 'Process Steps Overview' will also be updated to reflect that it is expected that the DNO has agreed the change of connection type and a target date with the customer, that then needs to be shared with other parties, and the means of that communication will be as agreed with the relevant DNO.

	We note this was phrased like this in BP011 published by the MHHS Programme: **Notes – Arrangement of Work** * It is anticipated that the Supplier will liaise with interested parties (LDSO, Metering Service, Customer) to agree the nature of works and determine an agreed "Target Work Date". This will then be formally confirmed between the parties. * There are several options available for formally agreeing work/date, between the Supplier and Metering Service. For example, E-Mail, MS Portal, D0142/ D002. * As above, mechanism for agreeing work with the LDSO will be determined by each LDSO (E-Mail, Web Portal, etc.). * In instances where work is scheduled, by a Supplier, for an 'anticipated' SSD – it is that Supplier's responsibility to inform interested parties (i.e. Cancel the work) where ownership of the supply is not 'secured'.	

	It is not clear how we have gone from this to noting that the works "are agree between" parties with no mentions of the method by which this might occur. This is especially relevant as recently most agents have been removing phone numbers and contact points, instead pointing 3rd parties to service desks themselves manned by 3rd parties. This makes it difficult to achieve the agreement noted. The guidance here should be more realistic about the wording for this step, maybe mentioning the various methods by which works can be agreed and noting that that the customer can actually contact the DNO independently and arrange supply upgrades. **Reverse Migration** It would be good to include a reference to reverse migration and how this could be impacted by the Change of Market Segment process in this document; for example where an MPAN has migrated and subsequently goes through a Change of Market Segment. It could be the case that an MPAN with a smart meter has been migrated, and the supplier's current MOA (for the smart segment) is MHHS qualified, but the customer's preferred new MOA (for the advanced segment) is not. In that case we don't believe a reverse migration would be allowed to revert the MPAN back to the pre-MHHS arrangements to enable the non-MHHS qualified MOA to be appointed (as the HHMOA) – instead the MPANs would need to remain in the MHHS arrangements and the supplier would need to find an MHHS qualified MOA.	Reverse Migration – Adding clarity that a Reverse Migration would not be triggered on Change of Market Segment (without a Switch) will be helpful additional guidance. This has been added as a note in the overview section.

IMServ Europe Ltd (MEM)	The image quality of the process Map in the Change of Market Segment document is very poor and this makes it very difficult to use.	Thank you for the response. The image will be reproduced prior to publication to ensure that it is an appropriate quality.
National Grid Electricity Distribution (DNO)	Currently we have no further comments to add in relation to the 'Change of Market Segment' guidance document. This has been passed over to our technical team who will review this in greater detail.	Thank you for the initial response. The Code Manager will remain open to feedback on these documents and where material changes or improvements to the document are identified, updates to the document will be progressed via the Category 3 Change process.

Question 4:	DO YOU AGREE WITH THE PROPOSED APPROACH TO ADD THE 'CHANGE OF MARKET SEGMENT - GUIDANCE DOCUMENT' TO THE REC AS A CATEGORY 3 DOCUMENT UNDER THE RESPONSIBILITY OF THE METERING EXPERT PANEL?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes, we agree with this approach.	Noted - thank you.
EDF Energy Customers Ltd. (Energy Supplier)	We agree that the 'Change of Market Segment - Guidance Document' should be added to the REC as a Category 3 document under the responsibility of the Metering Expert Panel. This aspect of the new MHHS arrangements is especially complex and the transition to them is	Noted - thank you.

	likely to result in numerous errors, especially where there isn't a common understanding of how the new processes and messages should work. Anything that helps people to understand the new processes can only be useful and should help to reduce errors during the transition period and beyond.	
IMServ Europe Ltd (MEM)	No response included.	n/a
National Grid Electricity Distribution (DNO)	Yes, we are happy to agree with the proposed approach to add the 'Change of Market Segment' guidance document to the REC as a Category 3 document. This is being looked into further by our technical team who will report back to us with any findings.	Noted - thank you.