RETAIL ENERGY CODE

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01	Proposal Plan
02	**Impact Assessment V2.0**
03	Consultation
04	Final Recommendation

CHANGE REPORT

R0207 – IMPORT / EXPORT MOA CHARGING CLARIFICATION

DOCUMENT VERSION	V2.0
PROPOSED IMPLEMENTATION DATE	TBC
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Metering Expert Panel	**CHANGE PATH**	Authority Determined
PRIORITY STATUS	Medium	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Energy Suppliers, MOAs		

LEAD ANALYST (SOLUTION LEAD)	SUBJECT MATTER EXPERT
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OVERVIEW

BSC Mod 459 and REC CP R0144 were raised to allow different Meter Operator Agents (MOAs) to be appointed for the import and export MPANs on a shared meter. One of the justifications for this was to stop Export Suppliers being charged uncompetitive rates. Both changes have been placed on hold due to the Market-wide Half-Hourly Settlement (MHHS) Programme, so this change has been raised to specifically resolve the charging issue.

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BACKGROUND

1 SUMMARY

This change has been raised to solve part of the problem statement for R0144 - Allowing different Metering Equipment Managers (MEMs) to be appointed to Import and Export Metering Points, which is on hold due to MHHS.

R0144 is looking to resolve two problems raised by the Proposer:

1. It is easy for the Export Supplier to accidentally become non-compliant if the MOA on the Import MPAN is changed and they are unaware of this. This should be resolved by the MHHS design.
2. Because the Export Supplier has no choice in which MOA they appoint, they must have contracts with every MOA in the market to match the Import MOA. As this reduces competition for Export Suppliers, the Proposer states that they are receiving unfair/inflated charging from Export MOAs.

R0207 has been raised to attempt to resolve the second of these points.

2 AUTHORITY REFERAL AND SEND BACK

On 30 May 2025, the Authority published its decision to send back R0207 – Import / Export MOA Charging Clarification.

A working group was set up to address the issues in the send back letter, which are as follows:

- Comparison between Distribution Network Operator's (DNO) charging MOAs on a non-discriminatory basis as part of the Consolidated Metering Code of Practice (CoMCoP) to support this modification. Acknowledgment that this should not have been used as a comparison for this modification, as DNOs operating as monopolies under regulated price control cannot be compared to MOAs acting in an unregulated, competitive market.
- Performance Assurance Board (PAB) ability to oversee disputes relating to commercial agreements and conflict with CoMCoP, there is a requirement that the PAB is not responsible for the arbitration of commercial disputes. The PAB can only oversee disputes relating to provisions set out in the REC. Requiring Parties to disclose commercially sensitive and confidential information from negotiated contracts would not be appropriate, particularly considering the constitution of the PAB including competitor organisations.
- Risk that Export Suppliers who have negotiated lower rates with MOAs than Import Suppliers, or other Export Suppliers, could face increased charges. Additionally, if all suppliers are required to be treated the same, this could reduce competition. This is especially concerning given that competition is already limited, as Export Suppliers are required to use the Import Supplier's chosen MOA.
- As far as reasonably practicable, any solution must promote competition and ensure the interest of Consumers, particularly with pass through charges, is protected. Any revised

solution will need to be assessed against these principles as part of its impact assessment and consultation.

There have been two meetings of the working group, in September and October 2025. The slides and the minutes can be found here.

Following the first working group, it was agreed that the original problem statement should be updated to address the difficulty and complexity in Export Supplier's agreeing contracts with all Export MOA's.

An alternative solution was developed to address the problem statement and;

- Address the risk of unfair / uncompetitive charging arrangements for linked export suppliers;
- Allow MEMs to recover reasonable costs of delivering their services;
- Promote competition in the supply of metering services;
- Protect the interests of Consumers; and
- If required, be measurable and enforceable under the Retail Energy Code

3 PROBLEM STATEMENT

Original Problem statement:

Where the same electricity Metering Asset is being used for the measurement of Import and Export for more than one Metering Point, the Export MOA must be the same as the Import MOA. This may result in uncompetitive charging by the MOA, as the Export Supplier has no choice in their appointment.

Updated problem statement following Authority send back:

Where the same electricity Metering Asset is being used for the measurement of Import and Export for more than one Metering Point, the Export MOA must be the same as the Import MOA. This may result in uncompetitive charging by the MOA, as the Export Supplier has no choice in their appointment. It also leads to difficulty and complexity in Export Supplier's agreeing contracts with all Export MOA's as many Suppliers do not have contractual relationships with the Export MOA and many MOA's do not want to enter into these arrangements.

4 IMPACTS

CONSUMERS
Indirect – Export Consumers

REC PARTIES
Energy Suppliers (Import & Export)

REC DOCUMENTS / PRODUCTS
Schedule 14 – Metering Operations

	MOAs	Schedule 1 – Interpretations and Definitions

MHHS DESIGN	MHHS DATA SPECIFICATION	MHHS CODE DRAFTING
No impact	No impact	Indirect impact.

5 CONSUMER AND COMPETITION IMPACT

As far as reasonably practicable, any solution must promote competition and ensure the interest of Consumers, particularly with pass through charges, is protected. Therefore, the impact assessment will need to seek feedback on the proposal itself, as well as the assumptions regarding impacts to competition and Consumers. This will involve seeking input on commercial impacts to MOAs and Energy Suppliers, which may need to be shared confidentially. Any confidential information shared would not be detailed in the Change Report but may be collectively summarised and shared with Ofgem to support its decision. This approach and the questions to be included in the impact assessment, were agreed at the second working group meeting on 20 October 2025.

The assumptions to be confirmed as part of the Impact Assessment are;

- An MHHS Qualified MOA must provide the minimum services referenced in the definition of Basic Export MOA Services (auto-appointment/de-appointment, updates to meter information, etc.) as part of their services provided to an Import Supplier. This is required regardless of whether a contract is in place with the Export Supplier. Each MOA providing this service must therefore already consider the cost of these services when determining charges to the Import Supplier, as there is no guarantee they will be able to recover costs from the Export Supplier directly. Therefore, it is reasonable to assume that a MOA may consider these costs in their charges to the Import Supplier. In this scenario, the Import Supplier is still able to benefit from competition, as it would be down to the MOA to determine if and how these costs would need to be recovered.
- If a MOA has not factored in the costs of providing the Basic Export MOA Services, it is not expected that any costs a MOA may choose to recover in their charges to Import Suppliers would be material beyond those charges currently agreed. In the event that individual MOA's choose to introduce significant cost uplifts, the benefits of competition would still be available to the Import Supplier to validate and benchmark costs in the market.
- Any additional costs incurred from the implementation of this Change Proposal are unlikely to materially exceed the allowances made by Suppliers for the provision of Metering Services, and therefore should not result in a direct, material impact to Consumers.

6 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	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		1	9	9
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)	111

Priority Status	MEDIUM
Change Proposal Type	STANDARD

SOLUTION

7 PROPOSED SOLUTION

The proposed solution will introduce new requirements into Schedule 14 - Metering Operations, which is intended to ensure that where a MOA is Appointed for an Associated Import Metering Point, and therefore the Associated Export Metering Point, the MOA shall provide Basic Export MOA Services without requiring direct payment or a bilateral contract between the Export Supplier and MOA.

The Basic Export MOA Services would only apply to MHHS Metering Points, on the basis that the MOA is already required to accept the appointment for the Associated Export Metering Point and maintain metering information as part of the MHHS design. The Basic Export MOA Services will be restricted to specific sections of the Metering Operations Schedule and will not include a requirement to perform site visits or provide bespoke, specialist or competitive services to the Export Supplier. Where an Export Supplier wishes to procure these services, or other services, from the MOA they shall not be precluded from entering a bilateral agreement with the MOA.

8 DRAFT LEGAL TEXT

The legal text changes to deliver the updated proposed solution to R0207 can be found here.

It proposes the addition of two new defined terms in Schedule 1 Interpretation and definitions;

Basic Associated Export MOA Services	means the services which an MOA is required to provide under the following provisions of the Metering Operations Schedule, excluding any request for physical site visits: (a) paragraph 20 (Sharing Information following Electricity Meter Works); (b) paragraph 21 (Change of Energisation Status); (c) paragraph 22 (Electricity MOA Appointment);

	(c) paragraph 24 (Change of Advanced / Smart Data Service Agent); and (d) paragraph 25 (Change of Meter Asset Provider).
Export Supplier	means the Registered Supplier for an Export Metering Point.

And the following amendments to Schedule 14 Metering Operations;

2.7 Where the same electricity Metering Asset is being utilised for the measurement of the Import and/or Export for more than one Metering Point the Registered Supplier(s) for Import / Export Metering Points shall ensure that the same MOA is Appointed for all the Metering Points involved. The rules concerning the Appointment of an MOA in respect of an Associated Export Metering Point are described in Paragraph 22.3.

2.7A Where the same electricity Metering Asset for a Smart Metering Asset is being utilised for the measurement of Export and/or Import by two or more Electricity Suppliers, any of the Electricity Suppliers may raise queries about the functioning of communications equipment with the other Electricity Supplier(s) via the Secure Data Exchange Portal (SDEP) using Market Message PT0079 Smart Metering Communications Issues General Query (Elec).

2.7B The Electricity Supplier for an Associated Export Metering Point is entitled to the Basic Associated Export MOA Services, as described in Paragraph 2.20A.

…

2.20 Each electricity MOA shall ensure that the Import or Export of electricity at the Metering Points for which it is Appointed is accurately recorded by the applicable Metering Asset and that the time control and load switching devices are calibrated, installed and maintained in compliance with the relevant BSC Metering Code(s) of Practice.

2.20A Where an MOA is Appointed for an Associated Import Metering Point (and therefore also Appointed for the Associated Export Metering Point), the MOA shall provide the Basic Associated Export MOA Services to the Export Supplier without requiring any direct payment or bilateral contract between the Export Supplier and the MOA. However, the MOA and the Export Supplier may nevertheless enter into a bilateral contract under which the MOA agrees to provide services in addition to the Basic Associated Export MOA Services in return for the payment of charges, in which case such bilateral contract shall govern the provision of services in place of this Paragraph 2.20A.

2.21 Except in an emergency, the electricity MOA for MHHS Metering Points shall give the Advanced Data Service Agent sufficient notice of the installation, repair, removal, reprogramming, energisation or de-energisation of any meter associated with Advanced Metering Assets, to enable the Advanced Data Service Agent to recover the data

required for settlement using its normal method of data collection.

…

22.3 The MOA Appointment process shall be completed for each individual Metering Point, with the following exclusions:

(a) where the Metering Point is a Related Metering Point, the Electricity Supplier shall only submit a MOA Appointment for the Primary Related Metering Point (and the Supplier Meter Registration Service shall not accept any MOA Appointments submitted in relation to a Secondary Related Metering Points). Where the Supplier Meter Registration Service accepts a MOA Appointment which applies to a Primary Related Metering Point, then the Supplier Meter Registration Service shall treat each Secondary Related Metering Point as if the MOA Appointment was also made in relation to it.

(b) Where the Metering Point is an Associated Export Metering Point, the Electricity Supplier shall only submit a MOA Appointment for the Associated Import Metering Point (and the Supplier Meter Registration Service shall not accept any MOA Appointments submitted in relation to Associated Export Metering Points). Where the Supplier Meter Registration Service accepts a MOA Appointment which applies to an Associated Import Metering Point, then the Supplier Meter Registration Service shall treat each Associated Export Metering Point as if the MOA Appointment was also made in relation to it. The MOA being appointed in respect of the Associated Import Metering Point shall comply with this Paragraph 22 in respect of both the Associated Import Metering Point and the Associated Export Metering Point.

9 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link

10 GLOSSARY

TERM	DEFINITION
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Export	means electricity which is exported from a Premises.
Export Metering Point	means a Metering Point which identifies exports from a Location.
Import	means electricity which is imported to a Premises.
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.
Meter Point Administration Number (MPAN)	means the unique reference number used to identify electricity Metering Points.