RETAIL ENERGY CODE

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R0207 IMPORT / EXPORT MOA CHARGING CLARIFICATION IMPACT ASSESSMENT REQUEST

VERSION	2.0
DATE ISSUED	14/11/2025
RESPONSE DEADLINE	05/12/2025
PARTY RESPONSES REQUESTED	Energy Suppliers, MOAs

SOLUTION LEAD	Holly Law	Holly.Law@recmanager.co.uk

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.

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. 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 its reasonable costs of delivering its 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

LINKS

- Change Proposal
- Change Report

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SOLUTION OVERVIEW

The proposed solution is to 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 bilateral contract between the Export Supplier and MOA.

The Basic Export MOA Services would only apply to MHHS Metering Points, on the basis 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.

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

QUESTIONS

No.	QUESTION
1	Do you have any comments on the proposed solution?
2	Do you agree the proposed solutions address the problem statement?
3	Are there any alternate solutions that would better address the problem statement?
4	Would you incur additional costs, in addition to those incurred today, in providing the 'Basic Associated Export MOA Services' to Export Suppliers? Please provide details, including a rough order of magnitude. (MOAs only – confidential).
5	Do you consider it is reasonable to assume a MOA would have already had to consider the cost of providing the 'Basic Associated Export MOA Services' as part of its MHHS qualification and service offering?
6	Would you incur any additional costs as a result of implementing this Change Proposal that would result in additional pass-through costs to Consumers? Please provide details, including a rough order of magnitude. (Suppliers only – confidential).
7	Do you agree that any additional costs incurred from the implementation of this Change Proposal are unlikely to result in a direct, material impact to Consumers?
8	Do you have any comments on the draft legal text?
9	Do you consider changes to your commercial agreements with Import Suppliers / MOAs will be required if this Change Proposal is implemented?
10	What lead time would be required by your business to implement the proposed solution? Please provide justification.
11	Do you identify any benefits to your business through the implementation of the proposed solution?