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

CHANGE REPORT

R0284 UPDATES TO SCHEDULE 14 MEASUREMENT TRANSFORMERS COMMISSIONING TIMESCALES

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	25 June 2027
IMPLEMENTATION APPROACH	Big Bang

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

LEAD ANALYST (SOLUTION LEAD)	SUBJECT MATTER EXPERT
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OVERVIEW

The current timescales in the REC Schedule 14 Metering Operations sections 15.6 and section 30.6 where an Electricity Metering Asset requires commissioning in accordance with BSC Metering CoP4 need to be reviewed before the Settlement timetable changes the Reconciliation Final (RF) run from being 14 to 4 months to ensure the timescales remain fit for purpose.

CODE MANAGER MINDED TO POSITION

The Code Manager recommends that the Metering Expert Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 25 June 2027.

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BACKGROUND

1 SUMMARY

REC Schedule 14 Metering Operations sets out in section 15.6 and section 30.6 the process that shall be followed where an Electricity Metering Asset requires commissioning in accordance with BSC Metering Code of Practice 4 (CoP4) and the Measurement Transformers are owned by the Distribution Network Operator (DNO). The timescales for this are currently:

- DNO commissions the Measurement Transformers within 16WDs of Energisation (or receipt of D0139);
- DNO sends D0383 Notification of Commissioning Information within 21WDs of Energisation;
- Meter Operator Agent (MOA) commissions Metering Asset within 32WDs of Energisation;
- Electricity Supplier resolves any defects/omissions preventing commissioning within 65WDs of Energisation;
- After resolution, MOA commissions Metering Asset within 80WDs of Energisation; and
- MOA notifies Electricity Supplier commissioning has been completed within 5WDs of completion.

There are also processes with similar timescales set out in sections 15.7 and 30.7, where commissioning is required for Measurement Transformers not owned by the DNO.

In total, these processes could take up to 85WDs. Under the new Settlement timetable being introduced at Market-wide Half Hourly Settlement (MHHS) milestone M16 (currently planned for July 2027), the RF run will be changing to 4 months which is very close to this 85WD window.

This could lead to issues where defects are identified very close to or potentially after the RF run has passed, making it difficult for any Settlement errors to be corrected. This REC Change Proposal looks to review these timescales to make sure they are still appropriate once MHHS milestone M16 has passed.

2 PROBLEM STATEMENT

The current timetables in REC Schedule 14 Metering Operations sections 15.6 and 30.6, where an Electricity Metering Asset requires commissioning in accordance with BSC Metering CoP 4 and the Measurement Transformers are owned by the DNO, or in 15.7 and 30.7 where the Measurement Transformers are not owned by the DNO, may no longer be fit for purpose post the implementation of MHHS Milestone M16, where the Settlement timetable reduces the RF run to 4 months.

3 IMPACTS

CONSUMERS
Electricity Consumers with this Metering set up

REC PARTIES AND SERVICE USERS
Electricity Suppliers
DNOs
MOAs

REC DOCUMENTS / PRODUCTS
Schedule 14 – Metering Operations

MHHS
Indirect impact, as will be proposing changes to REC Schedule 14 Metering Operations section 30.6 and 30.7 which is specific to MHHS Migrated Metering Points.

4 CROSS-CODE IMPACTS

There are no cross-code impacts expected from this Change Proposal. However, this will be monitored via the Cross Code Steering Code (CCSG) for any potential impacts to the Balancing and Settlement Code (BSC) and the Distribution Connection and Use of System Agreement (DCUSA).

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**12 Dec 25**	**30 Apr 26**
	Code Manager Initial Assessment	December	January
	Solution Development	January	February
	Impact Assessment	February	March
	Solution Refinement	March	April
	Business Case Assessment	March	April
Change Proposal		**01 May 26**	**11 Aug 26**
	Consultation	May	June
	Solution Refinement	June	July
	Final Determination	July	August
Voting		**12 Aug 26**	**12 Aug 26**
	Appeal Window	13 Aug 26	27 Aug 26

6 STAKEHOLDER ENGAGEMENT

The Code Manager will utilise the Change Issues Group alongside its usual methods (impact assessment, consultation) of stakeholder engagement for feedback into this Change Proposal. It will also as required use the REC Metering Expert Panel as a critical friend.

This Change Proposal was presented at the Change Issues Group on 05 February 2026, with the minutes available here. Feedback was generally positive, with some attendees providing further feedback that the timescales for each step within the process should be linked to the previous step (rather than all timescales being linked to the date of Energisation). This should avoid early steps being completed quickly and later steps stalling.

There was also discussion around reducing the timescale for the D0384 Notification of Commissioning Status Market Message from 5 Working Days to 3 Working Days to align more closely with Meter Technical Details exchange requirements. The Code Manager took this away to consider, but has at this time not included it in the solution after feedback from some Parties indicated they would like the timescales to change as little as possible.

7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	1	27	27
	Retail Markets Impact	Retail Risk(s)	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	7	7
		Legal and Regulatory Compliance	0	14	0
Resource	Complexity / Effort / Duration		2	9	18
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	3	10	30
				Overall Priority Score (rounded)	115

Priority Status	MEDIUM
Change Proposal Type	STANDARD

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SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

The Code Manager requested Parties to provide any data they could related to this Change Proposal as part of Party impact assessment, particularly regarding what percentage of commissions already exceed the current 80 Working Day timescale.

One response was received confidentially which the Code Manager has considered as part of this Change Proposal.

9 PROPOSED SOLUTION

The proposed solution makes changes to Schedule 14 Metering Operations sections 15.6, 15.7, 30.6 and 30.7. Originally the Code Manager was only looking at sections 15.6 and 30.6, but has expanded this out post impact assessment as 15.7 and 30.7 use the same timescales.

This solution uses the basis of what was labelled solution one at Party impact assessment, which looked to reduce the timescales from 85 Working Days to 75 Working Days. It has however been refined to link each step in the process to the previous step, rather than linking all timescales back to the date of Energisation.

The proposed changes to sections 15.6 and 30.6 are in the below table, with the differences between Clause numbers captured in square brackets. There may be some differences in the action column (mostly regarding additional information) – the below reflects 15.6, with a link to the full track changed document of both 15.6 and 30.6 available in section 10 of this Change Report.

Ref	When	Action	From	To	Information Required	Method
[15.6.1 / 30.6.1]	At the earliest opportunity, but no later than 15 ~~6~~WD after energisation (if DNO energises) or 15~~6~~ WD after receipt of the D0139 from MOA (if MOA or its EMO energises)	Commission Measurement Transformers in accordance with BSC Metering Code of Practice 4.	DNO		Internal Process	N/A

[15.6.2 / 30.6.2]	At the earliest opportunity but no later than ~~21WD after energisation (if the DNO energises) or 21WD after receipt of the D0139 (if the MOA or its EMO energises)~~5 WD after [15.6.1 / 30.6.1]	Send commissioning information for the Measurement Transformers.	DNO	MOA	D0383 Notification of Commissioning information.	Electronic or other method, as agreed
[15.6.3 / 30.6.3]	On the date requested or agreed in [15.5.1 / 30.6.1] but no later than ~~32WD after energisation (if MOA or its EMO energises) or receipt of the D0139 (if the DNO energises)~~10 WD after [15.6.2 / 30.6.2]	Commission Metering Asset in accordance with appropriate BSC Metering Codes of Practice for the Metering Asset and BSC Metering Code of Practice 4. If commissioning is completed successfully, proceed to [15.6.7 / 30.6.7], otherwise proceed to [15.6.4 / 30.6.4].	MOA		Internal Process	N/A
[15.6.4 / 30.6.4]	Within 5 WD of [15.6.3 / 30.6.3] if there has been a defect / omission that prevented commissioning. A defect or omission in the completion of the processes is set out in CoP4 and will also include that the D0383 'Notification of Commissioning status' flow has not been received from the Distribution Network Operator.	Send notification that there is a defect/omission that has prevented commissioning.	MOA	Electricity Supplier	D0384 Notification of Commissioning status	Electronic or other method, as agreed.

[15.6.5 / 30.6.5]	At the earliest opportunity but no later than ~~65~~WD ~~after energisation (if~~ MOA ~~energises) or receipt of the~~ D0139 ~~(if the~~ DNO ~~energises)~~20 WD after [15.6.4 / 30.6.4]	Resolve the defect/omission that has prevented commissioning. It shall be the responsibility of the Electricity Supplier to ensure that the Metering Asset is appropriately commissioned. If the Electricity Supplier believes that there is a risk to Settlement it shall, in accordance with Section L3.6 of the BSC, consult with the relevant Distribution Network Operator and agree the appropriate steps to be taken to minimise the risks to Settlement.	Electricity Supplier	DNO [ADS / HHDC]	D0384 Notification of Commissioning status	Electronic or other method, as agreed.
[15.6.6 / 30.6.6]	When defect / omission has been resolved, but no later than ~~80~~WD ~~after energisation (if the~~ MOA ~~energises) or receipt of the~~ D0139 ~~(if the~~ DNO ~~energises)~~15 WD after [15.6.5 / 30.6.5]	Commission Metering Asset in accordance with appropriate BSC Metering Codes of Practice for the Metering Asset and BSC Metering Code of Practice 4.	MOA		Internal Process	N/A
[15.6.7 / 30.6.7]	Within 5 WD of [15.6.3 / 30.6.3] or [15.6.6 / 30.6.6] if commissioning was completed successfully.	Send notification that commissioning has been completed. Notification that commissioning has been completed shall not be sent if complete information has not been received from the Distribution Network Operator.	MOA	Electricity Supplier	D0384 Notification of Commissioning status	Electronic or other method, as agreed.
[15.6.8 /	Following [15.6.7 / 30.6.7].	Create internal record of MOA	MOA		Internal Process	N/A

30.6.8]		commissioning. This will be used for the change of MOA process and the passing of complete commissioning information.				

The proposed changes to sections 15.7 and 30.7 are in the below table, with the differences between clause numbers captured in square brackets. There may be some differences in the action column (mostly regarding additional information) – the below reflects 15.6, with a link to the full track changed document of both 15.7 and 30.7 available in section 10 of this Change Report.

Ref	When	Action	From	To	Information Required	Method
[15.7.1 / 30.7.1]	On the date requested or agreed in [15.5.1 / 30.7.1] but no later than 30 ~~2~~WD after energisation.	Commission Metering Asset in accordance with appropriate BSC Metering Codes of Practice for the Metering Asset and BSC Metering Code of Practice 4. If commissioning is completed successfully, proceed to [15.7.5 / 30.7.5], otherwise proceed to [15.7.2 / 30.7.2].	MOA (or its EMO)		Internal Process	N/A
[15.7.2 / 30.7.2]	Within 5WD of [15.7.1 / 30.7.1] if there has been a defect/omission that prevented commissioning. A defect or omission in the completion of the	Send notification that there is a defect/omission that has prevented commissioning.	MOA	Electricity Supplier	D0384 Notification of Commissioning status	Electronic or other method, as agreed.

	processes is set out in BSC Metering Code of Practice 4.					
[15.7.3 / 30.7.3]	At the earliest opportunity but no later than ~~65WD after energisation.~~20 WD after [15.7.2 / 30.7.2]	Resolve the defect/omission that has prevented commissioning. It shall be the responsibility of the Electricity Supplier to ensure that the Metering Asset is appropriately commissioned. If the Electricity Supplier believes that there is a risk to Settlement it shall, in accordance with Section L3.6 of the BSC, consult with the relevant Distribution Network Operator and agree the appropriate steps to be taken to minimise the risks to Settlement.	Electricity Supplier	DNO [ADS / HHDC]	D0384 Notification of Commissioning status	Electronic or other method, as agreed.
[15.7.4 / 30.7.4]	When defect / omission has been resolved, but no later than ~~80WD after energisation.~~15 WD after 15.7.3	Commission Metering Asset in accordance with appropriate BSC Metering Codes of Practice for the Metering Asset and BSC Metering Code of Practice 4.	MOA		Internal Process	N/A
[15.7.5 / 30.7.5]	Within 5 WD of [15.7.1 / 30.7.1] or [15.7.4 / 30.7.4] if commissioning was completed	Send notification that commissioning has been completed.	MOA	Electricity Supplier	D0384 Notification of Commissioning status	Electronic or other method, as agreed.

	successfully.					
[15.7.6 / 30.7.6]	Following [15.7.5 / 30.7.5].	Create internal record of MOA commissioning. This will be used for the change of MOA process and the passing of complete commissioning information.	MOA		Internal Process	N/A

9.1 DESCOPED SOLUTIONS

Party impact assessment included a second solution option, which looked to reduce the timescales from 85 Working Days to 65 Working Days. This has been descoped following the feedback received at Party impact assessment.

More information on the solution options as presented as Party impact assessment can be found in the Change Issues Group paper here.

10 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0284 can be found here.

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PRELIMINARY ASSESSMENT

11 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

11.1 SERVICE PROVIDER IMPACT ASSESSMENTS

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

11.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was conducted from 06 February to 06 March 2026. In total seven responses were received from three Energy Suppliers, three DNOs and one Metering Equipment Manager (MEM). The non-confidential responses have been published here.

ENERGY SUPPLIERS	• Two Energy Suppliers were in favour of solution option two, and one believed neither solution should be implemented. • The Energy Supplier who did not believe this Change Proposal should be implemented raised concerns that many commissions already take longer than the 85 Working Day timescale and that many factors causing delay can be outside of the control of the MOA. The Code Manager does not disagree with this assessment but believes that the associated SLAs should be reflective of best practice – in this case, being before the RF run. • One Energy Supplier who favoured solution option two preferred it as it provided a larger window to deal with any issues before the Settlement cut off. The other provided no reasoning. • No Energy Supplier flagged any processes or scenarios that may be impacted by this Change Proposal that had not been considered. • One Energy Supplier confirmed they would require one month between approval and implementation of this Change Proposal; the others did not answer this question. • No constraints on when this Change Proposal could be implemented were raised, and no risks to MHHS Qualification or Migration plans were identified. • One Energy Supplier confirmed they foresaw their costs of implementation as being less than £10,000; the others did not provide a response to this question. • One Energy Supplier confirmed they saw the benefits of implementation of this Change Proposal as being improving the chances of more accurate Settlement data once MHHS changes the Settlement timetable. The others provided no response to this question.

DISTRIBUTION NETWORK OPERATORS	• One DNO was in favour of solution option one, one in favour of solution option two and one believed neither solution should be implemented. • The DNO who favoured solution option one stated it was because this would have the least impact on existing processes. The DNO who did not favour either solution confirmed they were not sure if either solution felt viable. The DNO who favoured solution option two again preferred it as it provided a larger window to deal with any issues before the Settlement cut off. The other provided no reasoning. • One DNO queried if it was possible to align timescales with a Settlement run, as the current timescales align roughly with the R2 Settlement Run. Post M16 there will only be II, SF, R1 and RF runs. The Code Manager does not think it appropriate to align to the new R1 run, as this is roughly 30 Working Days and does not provide enough time for this process to take place. • No DNO flagged any processes or scenarios that may be impacted by this Change Proposal that had not been considered. One did confirm they were still checking something internally, and the Code Manager has requested they come back to us as soon as possible if anything is identified. • One DNO confirmed they would require one month between approval and implementation of this Change Proposal; the others stated six or six to nine months. • No constraints on when this Change Proposal could be implemented were raised, and no risks to MHHS Qualification or Migration plans were identified. • One DNO confirmed they foresaw no costs from the implementation of this Change Proposal, and another confirmed they saw it as being maximum £50,000. The third DNO provided a confidential response which has been considered by the Code Manager. • Two DNOs confirmed they saw no benefits from the implementation of this Change Proposal, the other did not provide a response to this question.
METERING EQUIPMENT MANAGERS	• The MEM was in favour on solution option one. They did not provide reasoning for their preference. • The MEM did not flag any processes or scenarios that may be impacted by this Change Proposal that had not been considered. • The MEM confirmed they would require six months between approval and implementation of this Change Proposal. • No constraints on when this Change Proposal could be implemented were raised, and no risks to MHHS Qualification or Migration plans were identified.

	• The MEM provided a confidential response on costs they saw from the implementation of this Change Proposal, which has been considered by the Code Manager. • The MEM confirmed that while they saw no benefits to their specific business from the implementation of this Change Proposal, and they did see benefits to the Settlement process at large.

11.3 SUMMARY OF AMENDMENTS MADE FOLLOWING IMPACT ASSESSMENT

The following amendments were made to the solution post impact assessment:

- Expand scope to include Schedule 14 Metering Operations sections 15.7 and 30.7, as these use the same timescales as 15.6 and 30.6; and
- Delink timescales for steps from date of Energisation (other than step 1) and link them to the previous step within the process.

12 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

NO.	RISK	NOTES	MITIGATION
R01.R0284	Decreasing the timescales for commissioning Measurement Transformer may lead to an increased number of commissions happening outside of SLA.	The Code Manager acknowledges many commissions already occur outside the current timescale, so shortening this timescale may lead to an increase in this number. However this has been deemed as an acceptable risk, as the SLA should reflect industry best practice and should be before the RF Settlement Run.	n/a

No assumptions, issues or dependencies have been identified as part of this Change Proposal.

13 BUSINESS CASE ASSESSMENT

13.1 COSTS

There are no central systems costs associated with this Change Proposal.

Costs were identified by Parties at impact assessment, ranging between £0 and £50,000 with the majority being towards the lower end of this spectrum.

13.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
INCREASED SETTLEMENT ACCURACY POST MHHS MILESTONE M16	MHHS Milestone M16 will change the RF Settlement Run from 14 to 4 months and is currently planned to happen in July 2027. The implementation of this Change Proposal updates timescales for commissioning Measurement Transformers to ensure the SLA is before Settlement data can crystalise. The Code Manager understands that not all commissions can be completed within this SLA (and that not all commissions are completed within the current SLA) but is of the belief that updating the timescales and having Parties update their internal processes will enable a large proportion of commission to happen before the new RF run.

13.3 COST BENEFIT ANALYSIS

The Code Manager has had to balance reducing the timescales for commissioning Measurement Transformers, so this process has an SLA which is sufficiently before the new MHHS M16 RF Settlement Run, with the impact reducing these timescales will have on Parties. The Code manager is confident that this balance has been struck with the proposed solution.

As there are no central system costs, costs to Parties are proportionate for the proposed changes and one intangible benefit associated with this Change Proposal, the Code Manager believes there is a positive case for change.

14 CASE FOR CHANGE

The Code Manager considers there is a positive case for change for implementing this Change Proposal on the basis that the proposed solution:

- Is both viable and implementable, and effectively resolves the problem statement;
- Has no associated central systems costs, and Party costs are proportionate for the proposed changes;
- Has proportionate effort required for implementation; and

- Should increase Settlement accuracy for Metering Assets with Measurement Transformers requiring commissioning once MHHS Milestone M16 is implemented.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link

16 GLOSSARY

TERM	DEFINITION
BSC Metering Code of Practice 4 (CoP4)	means, the Code of Practice for the Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes, established or adopted in accordance with the Balancing and Settlement Code.
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Electricity Supplier	means a person holding an Electricity Supply Licence.
Energise	shall have the meaning given under the DCUSA, and 'energised', 'energisation' and similar expressions shall be interpreted accordingly.
Market-wide Half Hourly Settlement (MHHS)	means market-wide half hourly settlement, which is being introduced pursuant to the BSC (see MHHS Implementation).
Measurement Transformers	means either a Current Transformer (CT) or a Voltage Transformer (VT) or a device carrying out both such functions, whose purpose is to enable the Metering Equipment to operate at a more convenient current and/or voltage than otherwise present.
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.

TERM	DEFINITION
Metering Asset	shall have the same meaning as Metering Equipment.
Metering Equipment	means: (a) in relation to gas, all the components of a meter installation and ancillary equipment, as defined in IGEM/G/1 edition 2; or (b) in relation to electricity, means the equipment associated with a particular meter, including the meter itself and any related Current Transformer (CT) and/or Voltage Transformer (VT), communication and/or control equipment, as may be further defined in the BSC.
Metering Operations Schedule	means REC Schedule 14.
Metering Point	has the meaning given to it in the Electricity Distribution Licence, which for the time being means: “the point, determined according to the principles and guidance given in the MRA Transition Schedule to the Retail Energy Code, at which a supply of electricity taken into or conveyed from the licensee’s Distribution System: (a) is or is intended to be measured; or (b) where Metering Equipment has been removed, was or was intended to be measured; or (c) in the case of an Unmetered Supply, is treated as measured.”
MHHS Migration	means the act of migrating a Metering Point in accordance with the REC MHHS Migration Schedule. "MHHS Migrated" shall be interpreted accordingly.
Working Day (WD)	means any day other than a Saturday, a Sunday, Christmas Day, Good Friday or a day that is a bank holiday in either or both England and Wales within the meaning of the Banking and Financial Dealings Act 1971.