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I0312 WORKING GROUP
MEETING MINUTES

MEETING	**I0312WG_0306**
DATE	**03 June 2026, 11:00**
LOCATION	**On Teams**

Attendee	Representing	Initials	Role
Jon Hawkins	Retail Energy Code Company	JH	Chair; Director of Market Design
Bela Ashworth	REC Code Manager	BA	Secretary; Change Analyst
Glenn Sheern	REC Code Manager	GS	REC Regulatory Specialist
Molly Fraser	REC Code Manager	MF	Working Group Member
Aleksandra Maczka	REC Code Manager	AM	Working Group Member
Chelsea Evans	REC Code Manager	CE	OAM; Working Group Member
Jemma Johnson	Retail Energy Code Company	JJ	Working Group Member
Rebecca Lowe	Retail Energy Code Company	RL	Working Group Member
Rebecca Griffiths	Retail Energy Code Company	RG	Working Group Member
Rebecca Bennett	Centrica	RB	Working Group Member
Yvette Lawrence-Hood	Centrica	YL-H	Working Group Member
Kristina Leary	SMS	KL	Working Group Member
Helen Clarke	Stark	HC	Working Group Member
Georgina Watkins	Good Energy	GW	Working Group Member
Liz Kelf	Good Energy	LK	Working Group Member
Lee Walker	Elexon	LW	Working Group Member

George Barnes	Utilita	GB	Working Group Member
John Greene	SSE	JG	Working Group Member
Nik Wills	Stark	NW	Working Group Member
Ralph Azagoh-Kouadio	F&S Energy	RA-K	Working Group Member

1 INTRODUCTIONS

JH opened the meeting, and explained that the focus of the session would be to explore in further detail three key areas:

- meter installation, removal and exchange;
- fault resolution; and
- changes to energisation status.

2 REVIEW MINUTES AND ACTIONS OF PREVIOUS MEETING

No comments were received and no amendments were proposed to the draft minutes of the first session. WG members approved the minutes and actions of the previous meeting.

3 PARAMETERS OF I0312

JH gave an overview of the parameters of the I0312 review, summarising key points raised in the first session:

- MHHS introduces the auto-appointment process – the Import Supplier will be responsible for appointing the Meter Operator for the Import MPAN and, where that is linked with an associated Export MPAN in SMRS, the same operator will be appointed for the Export supply, regardless of whether there is a contract in place between the Export Supplier and the new Export MOA.
- R0207 will establish that, where auto-appointment is triggered, there are basic services that are expected to be provided by the Export MOA to the Export Supplier, regardless of whether a direct contract is in place. Beyond those basic services, a direct contract is needed between the Export Supplier and the Export MOA. This includes requests for site visits, bespoke services, and meter works installations. R0207 is due to be presented for final vote on 10 June and will be designated for Authority Determination following the vote.
- Regardless of whether R0207 is approved by the Authority, the situation will continue to exist that the MOA will not be obligated to perform site works without a valid contract in place with the Supplier. If an Export Supplier wishes to request meter works from a

MOA, there needs to be a direct contract in place. Without one, the MOA is within their rights to reject the request.

- In reviewing use cases for I0312, WG members are encouraged to assume that only the Import Supplier is in a position to request meter works from the MOA, and the Export Supplier may only do so when they have entered into a direct contract with the MOA.

4 METERING ASSET INSTALLATION, REMOVAL, EXCHANGE / RECONFIGURATION

4.1 METER EXCHANGE

JH presented an overview of the current default position for requesting meter exchanges. Where there is no direct contract between the Export Supplier and the Export MOA, and only the Import Supplier can request that the meter is removed or exchanged, the MOA will have to send a copy of any updated Meter Technical Details (MTD) to the Export Supplier. The Export Supplier would only be informed of the meter removal / exchange, only the Import Supplier would be able to request those works.

JG requested clarification that the notification by the MOA to the Export Supplier would only be after the event. JH clarified that the default position would be that the Export Supplier would not have prior knowledge of the request having been made or accepted. They would only be informed by the Export MOA after the work has been completed.

RA-K highlighted that they have seen instances where the MOP, on the request of the Import Supplier, has completed a meter exchange, but did not inform the Export Supplier by sending through a D-026 to update the site. RA-K questioned how we could get the MOP to provide this update to the Supplier. JH clarified that, in the post-MHHS migration world, these processes would be automatically synchronised for both Import and Export Supplier. A requirement for MHHS migrated Metering Points is that where the MOP is appointed for both Import and Export Suppliers and MTDs are shared, the MOP will be obligated to share any updates to the meters with both Suppliers. Pre-MHHS migration, it continues to be a manual process to be managed by each MOP.

WG members were reminded that the I0312 review should be assessed through the lens of a post-MHHS migration. JH noted that the situation for legacy Metering Points will also need to be considered. AM noted that the REC Performance Assurance team will also support the I0312 review in an advisory capacity and to ensure assurance, monitoring and possible enforcement avenues are effectively considered.

RB raised an additional question about Export new connections, where the customer has Import Supply (solar panels or other form of renewable generation) and they have created an Export MPAN. While those appointments will be auto aligned, it is not clear how the Import Supplier would be able to request reconfigurations, or how to add the additional registration. The review of the relevant REC products should clarify how this scenario is managed and how the MOA can ensure that the MTDs are sufficiently updated.

JH presented several scenarios for consideration:

- Beyond a fault resolution, what are the scenarios in which the Export Supplier may wish to lead on the meter works and request changes to the shared meter?
- Where there is a non-smart to smart or advanced meter exchange, would the Export Supplier want to lead on or be able to make this request? This could involve a legacy non-smart meter where the Export Supplier is looking to implement an AMR or advanced meter set-up.
- Where there is an Import-only meter (non-smart), would the Export Supplier wish to change this to Import/Export rather than install an Export-only meter?

RB noted that in terms of settlement performance, Export MPANs are included in the Supplier's settlement portfolio under Elexon. If the Export Supplier needed to change the communications or metering, that would likely be due to a fault resolution. However, some of the scenarios already mentioned may be areas the Export Supplier may want to get more involved in.

LK noted that they see many customers who want a half-hourly settled meter, even if the Import Supply is not settled half-hourly. There are scenarios in which an Export Supplier would want to install a half-hourly capable meter, whether that is smart or advanced. A lot of the time, this request may be driven by the customer (commercial sites), who does not want a dual-meter set-up. It is less often that the Supplier is driving the exchange. LK further clarified that this scenario can occur in both where there is a standalone Export supply, or where there is a customer-appointed agent driving the metering set-up through a customer-appointed MOP.

4.1.1 SLIDO – METER EXCHANGE – WHAT SCENARIOS (OTHER THAN FAULT RESOLUTION) WOULD THE EXPORT SUPPLIER NEED TO EXCHANGE THE SHARED IMPORT/EXPORT METER?

A WG member commented that the Export Supplier may want the ability to lead the exchange where there is possibly meter interference/tampering that impacts the Export register. JH asked the group for clarity on investigations of meter interference by the Export Supplier. LK clarified that, while rare, the scenario can occur that the Export Supplier investigates meter interferences, but it is more prevalent for Import metering.

JJ further clarified that it is rare, but where there are meter types with a direct link to Export equipment and the Export is not owned by the customer, there is a potential route for theft as the Export Supply is not feeding that customer directly. For example, the situation in which a developer is able to have shared Export Supply from solar panels on a rented roof. The customer would not benefit from the energy generated, but the developer who sells it do. In this scenario, the Export meter is a dual-element meter with the second element being the Export but not owned by the customer. There is potential for the customer to tap into that Export Supply.

Secondly, JJ pointed out that where there is an Export Supplier driving a meter exchange, the meter may have a wired link to the Export equipment, which runs downstream, so the meter exchange would not impact the meter specifically. However, for dual-element meters or older Export meters where the actual Import/Export is linked, there may be wiring to the Export equipment that is attached to the meter. If an Export Supplier wanted to change that set-up, it would require a change to the meter as well.

4.2 SLIDO – METER REMOVAL – SHOULD THE EXPORT SUPPLIER BE ABLE TO REQUEST PERMANENT REMOVAL (AND DE-ENERGISATION) OF THE METER?

JH explained that meter removal in this review means the full removal of the meter and de-energisation of the supply, of a shared Import/Export metering asset. For example, the generation equipment is decommissioned and therefore the meter should be removed and the MPAN is disconnected, but there is shared Import/Export capability. In the event that the meter is removed by the Export Supplier and the site needs to be de-energised, this would disconnect the ability for the Consumer to import any electricity to the property. WG members were encouraged to consider the Slido question in two elements; should the Export Supplier have the ability to request the full removal (and de-energisation) of the meter, thus disconnecting the Import Supply as well? Or should requests for meter removal and de-energisation be restricted to the Import Supplier?

GB noted removal of the meter will entail a physical element of the site-visit and physically removing the meter, but also a non-physical element of removing the meter. In addition to removing the Export equipment and wiring, the Export Supplier will also need to request de-energised MTDs and de-energisation without physical works being completed. The latter is needed for settlement purposes. There are two processes involved and need to be retained. GB noted that Export Suppliers should be able to request non-physical meter removal (i.e., logical update to MTDs), but there may be additional considerations for their ability to request physical meter removals.

JJ agreed that there is a difference in requesting physical meter removals and logical updates to the MTDs, and where the former is needed, the Export Supplier should not be able to make that request. However, the scenario does occur where there is miscommunication or confusion over the MTDs and there is potential for it to happen by risk. There may need to be an obligation for the MOA to be able to recognise whether there is an Import Supply and the impact to it of having the meter removed. This may require additional communications with the Import Supplier to confirm they will not need to retain Import capability. This would be a manual process but would need to be done before any physical work is done on the site.

RA-K noted that the two Suppliers should still be able to work together and communicate on such meter work requests.
JH observed that there is a strong case for restricting the removal of the meter entirely. Nonetheless, the wider impact to the Import Supplier (and their contract) of the Export Supplier having the ability to permanently remove the meter would need to be further considered.

I0312WG_0306_A01: The Code Manager to include restricting meter removals to the Import Supplier only during the Impact Assessment.

4.3 USE CASE – ADDITIONAL EXPORT MPANS

WG members reviewed a use case where there is an Export MHHS new connection and the Export Supplier has not entered into a contract with the appointed MOA for the existing associated Import, and it is currently not clear how the Export Supplier would obtain the MTDs. The Export Supplier would not have access to the Import Supply MTDs, they have been

appointed a new Export MPAN and they do not have a historic relationship with the MOA. Additionally, not all the relevant details are provided in the IF-036. The shared metering asset has Export capability already.

JH observed that, in this scenario, the Export Supplier would still get the IF-036 because the SMRA will complete the auto-appointment process based on the fact that there is a link with an Import Supply.

RB noted that they are in the process of MHHS migration, but they have flagged a risk for migrated meters where they have been auto-appointed an Export MOA and experiencing delays in receiving the technical details.

LK noted that they are also migrating meters and so have not yet seen this behaviour yet, but they are equally concerned around the MTDs alignment process, particularly for new connections. There is an assumption that based on the Import-Export association and MTDs being held centrally, they would be automatically aligned, even if the meter is not linked to the new connection Export MPAN. LK caveated that this is theoretical and it would be good to understand the reality in the live-MHHS world.

I0312WG_0306_A02: The Code Manager to include validation of the IF-036 and sharing of MTDs for shared Import/Export metering asset in the Impact Assessment – does the SMRA populate the IF-036 with the Import Supplier's details as default, even when it is linked to an Export Supply?

JH noted that there are three scenarios to consider – non-smart, smart and advanced scenarios. Where there is a smart meter, the Export Supplier would receive the MTDs in the IF-036. Where there is a non-smart meter, the Supplier would be informed of the type of meter available, but the MOA may need to send the Export Supplier the D-0149 and D-0150. Similarly with advanced meters, whether the MOA needs to send the D-0268.

I0312WG_0306_A03: The Code Manager to investigate further and speak with MHHS colleagues and the MHHS Expert group.

One WG member commented on Slido that Import Suppliers have existing extensive billing rules and GSOP, so any metering works requested must consider the risk to billing and settlements. Another WG member commented the need to notify the Export Supplier of the meter works and holding the MOP accountable for ensuring the notifications are passed on to the Export Supplier.

LK noted that if the Export Supplier has an issue with the metering asset, they should be tracking any follow-up flows. It would be unreasonable to expect the Import Supplier to monitor the MOP and ensure the MOP has shared the relevant details with the Export Supplier. Under the BSC rules, Export Suppliers have similar obligations and SLA timeframes as Import Suppliers, and should be responsible for managing communications with the MOPs if they need to maintain accurate industry data on settlements.

JH noted that obligating the Import Supplier to monitor notifications may be a challenge as they only have visibility of their own portfolio. This could be a point of consideration for REC Performance Assurance as an obligation for the MOA to synchronise data with the Export Supplier could be managed through REC Assurance.

One WG member commented on Slido that SDEP may be used to allow Suppliers to communicate with each other before requesting meter works. RB agreed that a new SDEP query could be introduced and it should be mandatory to avoid delays for the customer, especially if they go to the Export Supplier to request works.

JG agreed that SDEP could be used where an Export Supplier has made a request that they then need to handover to the Import Supplier for them to raise. However, if an Import Supplier is raising a query because they have been requested to, they would not know at that point that there is an associated Export Supply. An obligation on the Import Supplier to always notify the Export Supplier may not be feasible.

GB noted earlier discussions around allowing Export Suppliers to arrange certain types of meter works themselves, and that this may have implications for the use of SDEP. If it is decided that Export Suppliers are restricted to arranging certain meter works, the situation may occur that the customer contacts the wrong Supplier to book a meter work. If both Suppliers are able to arrange all kinds of meter works, there may not be a need for notifying the other Supplier, especially if the notification is for courtesy only and the other Supplier will not be able to object to the meter works. Additionally, the obligation to notify the other Supplier for all meter works may be potentially quite intensive, whilst delivering minimal benefit.

HC noted that one Supplier's objections to another's meter work request should be determined before the job is raised to the MOA. Other considerations included whether Suppliers should have the ability to cancel the other's meter work requests and expectations around the ability to object – for both Suppliers, but also the MOA. HC suggested potentially including SLAs around the right to object.

BA captured this as an action for the next Working Group session.

5 FAULT RESOLUTION

JH provided an overview of the current default position of Import/Export Suppliers when a meter fault results in a meter exchange. In this case, the MOA must inform the Export Supplier of the meter exchange/removal when sending updated MTDs. However, the Export Supplier would not necessary be aware of the result of the fault investigation or the reasons for the updated MTDs. The MOA would only send the D0002 to the Import Supplier who made the request. The WG was asked whether there are scenarios in which the D0002 should be sent to both Import and Export Suppliers.

A few WG members commented on the Slido that this would prompt the Export Supplier to explore whether internal actions need to be taken following the investigation, or even prevent them from raising an unnecessary meter work request later on, particularly if the outcome of the investigation confirmed no fault was found.

HC questioned whether the D0001 should come from the Supplier or the data collector. There are scenarios in which multiple D0001s can be received on the same meter and one D0002 to close them – would it matter where the D0002 is sent?

JH noted that this leads to a broader question of whether there are certain notifications that might not be relevant to the Export Supplier and how would the MOA know which ones to send.

GB questioned whether the WG should also consider notification to the MOP of separate data collectors.

I0312WG_0306_A04: The Code Manager to explore scenarios that allow for a separate data service to be appointed for a shared Import/Export and how this would impact fault resolution.

5.1 SLIDO – SHOULD THE EXPORT SUPPLIER NOTIFY THE IMPORT SUPPLIER, OR SHOULD THE MOA (ON ACCEPTANCE)?

JH talked through slide 22 of the slide pack and explained that for the I0312 review, 'fault resolution' has been described in two situations of emergency and non-emergency (e.g., dial-up issues, blank/broken displays) faults. In both situations, consider that the Export Supplier has a contract with the MOA for additional services.

HC noted that the WG should also consider an emergency scenario in which DNOs get involved and may have to cut off the supply. In which case, the MOP would need to resolve the fault in a short time period. This depends on who communicates with the DNO.

JH noted that both Suppliers would need to know about the fault resolution in this emergency scenario, but it is likely that only the Import Supplier is notified as their supply has been cut off. However, if the generator is the lead supply, they may contact the Export Supplier instead.

RL raised that a Revenue Protection Service Provider could also be appointed by the Import/Export Supplier and they would be a separate party to the contracted MOA. This leads back to the question of who should be notified about a fault investigation and whether the Import Supplier should be required to notify the Export Supplier of both an investigation being raised and the outcome of it.

JH noted there is a risk that the Import Supplier removes a meter due to tampering, but the customer contacts the Export Supplier to have the meter installed again. The Export Supplier may not be aware of the meter tampering issue, which may have impacted the Export register as well as the Import register.

WG members commented on Slido the need for agreeing principles for engagement between Suppliers before raising a meter works request.

I0312WG_0306_A05: The Code Manager to include emergency works in the Impact Assessment, and whether a new provision within the REC is needed or whether this should be set out as expectations/guidance.

6 CHANGE OF ENERGISATION STATUS

JH talked through slide 24 of the slide pack and explained the default position is that only the Import Supplier can request a physical change to the energisation status. Logical changes will be covered under basic services introduced by R0207, if approved. The MOA will then have to inform the Export Supplier of the changes. The question arises whether the Export Supplier should ever be allowed to request de-energisation if it is for a non-safety reason. Similarly to fault resolution, the discussion was framed in terms of emergency and non-emergency situations.

Change of Energisation status will be picked up in the next WG session for further review.

7 NEXT STEPS, DATE AND TIME OF NEXT MEETING

Action Item	Owner	Deadline/Notes
Update work plan	REC Code Manager	Before next working group
Set up third working group session	Bela Ashworth	Date 14 July, 11:00-13:00
Accept bilateral feedback from participants	REC Code Manager	Ongoing – the Slido is open until 30 June 2026, but feedback is also welcome via Change.management@recmanager.co.uk

No objections raised to the proposed meeting date for the second session.

JH and BA thanked attendees for their engagement and feedback. Members encouraged to reach out via email for further discussion or confidential input (see contact details in slide 30 of attached slide pack).