RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0209 – IMPLEMENTATION OF MARKET-WIDE HALF HOURLY SETTLEMENT (MHHS) ARRANGEMENTS

On 18 September 2024 the Code Manager issued a consultation to industry to seek feedback on the Change Report for R0209.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	24/10/2024
RESPONSIBLE COMMITTEE	CHANGE PANEL
LEAD ANALYST	HARRIET TRUSS

DATE CONSULTATION ISSUED	18/09/2024
RESPONSE DEADLINE	09/10/2024

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<table>
<tr><th>Question 1:</th><td colspan="2">DO YOU AGREE WITH THE PROPOSED SOLUTION TO IMPLEMENT THE CODE DRAFTING DEVELOPED UNDER THE MHHS PROGRAMME? IF NOT, PLEASE EXPLAIN WHY?</td></tr>
<tr><th>RESPONDENT DETAILS</th><th>RESPONSE</th><th>CODE MANAGER COMMENTS</th></tr>
<tr><td>Northern Powergrid (Distribution Network Operator (DNO))</td><td>Yes</td><td>Noted – Thank you.</td></tr>
<tr><td>EDF
(Energy Supplier)</td><td>Yes, we agree with the implementation of the code drafting developed under the MHHS Programme.

We were closely involved in the MHHS code drafting workstream and participated in all of the consultations undertaken. As a result we have not re-reviewed the legal text that was approved by CCAG at M6 as part of this Change Request – we have only reviewed the changes from that baseline as highlighted within this Change Report and the draft legal text.</td><td>Noted – Thank you.</td></tr>
<tr><td>Centrica
(Energy Supplier)</td><td>We do have a couple of comments regarding the code drafting which have been listed below:
<table><tr><th>REC Document</th><th>Location</th><th>Comment</th></tr><tr><td>Rec Schedule 23 - Registration Services</td><td>All</td><td>In other schedules there are MHHS and non-MHHS tables - this one is inconsistent in that the current roles have been restored. This will not work for the transition period where current and new roles will co-exist. I suggest different table rows for MS and DS</td></tr><tr><td>Schedule 28 - Related Metering Points</td><td>2.2 and subsequent</td><td>This does not cover where the MPANs that need to be related are 1 MHHS and 1 not. This needs to be clarified here and in subsequent sections.</td></tr></table></td><td>Thank you for these comments.

The Code Manager has provided comments in the table immediately below Question 1.</td></tr>
</table>

Scottish Power Energy Networks (DNO)	Yes, previous consultations in respect of the code drafting that has been developed have been reviewed as part of the MHHS work.	Noted – Thank you.
Anonymous (Metering Equipment Manager (MEM))	Yes, we agree with the proposed solution.	Noted – Thank you.
ScottishPower (Energy Supplier)	We are content with the proposed implementation of the MHHS Programme drafting into the Code. We recognise the substantial efforts invested by a wide range of stakeholders into this endeavour.	Noted – Thank you.

QUESTION 1 CENTRICA RESPONSE – CODE MANAGER COMMENTS

Schedule 23	The approach to drafting in Schedule 23 was agreed through the Code Drafting Working Group under MHHS governance and explained in the drafting comments, against the relevant process steps, for the MHHS drafting consultations: "Legacy agents included as part of transition text. The requirement is to send to appointed agents so there is no need to differentiate MHHS from non-MHHS." It was agreed through consequential change discussions under the programme's Consequential Change Impact Assessment Group and the REC MSAG that Data Services would not be CSS Users and not be sent CSS Market Messages. Therefore, Data Services are not referenced within the process tables. To help provide clarity, the proposed legal text has been updated.
Schedule 28	This scenario is not explicitly covered in the MHHS design. There will not be any resulting update included in the R0209 legal text submitted for decision. However, this has been considered and the Code Manager will work with RECCo and the MHHS Programme to confirm the position. Further detail on the approach can be found in the Solution Development Report.

Question 2:	DO YOU AGREE WITH THE CORRECTION TO THE OWNERSHIP OF THE AMVLP SCENARIO VARIANTS? IF NOT, PLEASE EXPLAIN WHY?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (DNO)	Yes	Noted – Thank you.
EDF (Energy Supplier)	Yes – we agree that these corrections are appropriate.	Noted – Thank you.
Centrica (Energy Supplier)	Yes we agree	Noted – Thank you.
Scottish Power Energy Networks (DNO)	Yes	Noted – Thank you.
Anonymous (MEM)	We can see the merits of the AMVLP scenario variants moving under the ownership of Balancing and Settlement Code Company, however, would like to seek clarification that any future updates to these Data Flows will be completed via cross code updates?	The Code Manager supports that where changes to Market Messages and Scenarios Variants impact across different industry codes the code bodies work together to align changes where required.
ScottishPower (Energy Supplier)	We have no objections on the ownership changes to the AMVLP Scenario Variants under this proposal to raise at this stage.	Noted – Thank you.

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<tr><th>Question 3:</th><td colspan="2">DO YOU AGREE WITH THE INCLUSION OF THE ADDITIONAL REDLINED TEXT IN SCHEDULE 14 AND SCHEDULE XX? IF NOT, PLEASE EXPLAIN WHY?</td></tr>
<tr><th>RESPONDENT DETAILS</th><th>RESPONSE</th><th>CODE MANAGER COMMENTS</th></tr>
<tr><td>Northern Powergrid (DNO)</td><td>Yes</td><td>Noted – Thank you.</td></tr>
<tr><td>EDF (Energy Supplier)</td><td>Yes. We have reviewed the redlined text in these two schedules and agree that the changes from the text approved at M6 are appropriate and necessary.</td><td>Noted – Thank you.</td></tr>
<tr><td>Centrica (Energy Supplier)</td><td>Please find below our comments regarding Schedule XX (Migration):

<table><tr><th>REC Document</th><th>Location</th><th>Comment</th></tr><tr><td>RECXX (Migration)</td><td>1.3</td><td>If only one Service Provider (SP) appointment succeeds, I think there ought to be an obligation to retrospectively appoint the other SP (DS or MS as applicable) to the date of the successful appointee.</td></tr><tr><td>RECXX (Migration)</td><td>2.8.13</td><td>This is incorrect, supplier should be de-appointing following receipt of PUB-036 at 2.8.24 - otherwise this risks the migration being cancelled and no MOA or DC would then be appointed. This is a design error that is being corrected by the MHHS design team.</td></tr><tr><td>RECXX (Migration)</td><td>3</td><td>No mention of D0052 which has to be sent when an MSID is reverse migrated back to NHH arrangements - so trad, smart and advanced NHH meters.</td></tr></table></td><td>Thank you for these comments regarding Schedule XX – Migration.

The Code Manager has provided comments in the table immediately below Question 3.

There will not be any resulting updates included in the R0209 legal text submitted for decision</td></tr>
</table>

Scottish Power Energy Networks (DNO)	We have no issue with the additional redline text.	Noted – Thank you.
Anonymous (MEM)	We agree with the redlined texted introduced as part of R0209, however, a comment regarding the migration schedule has been added in the response to question 7.	Noted – Thank you.
ScottishPower (Energy Supplier)	We are content with the additional redlined text for Schedules 14 and XX under this proposal	Noted – Thank you.

QUESTION 3 CENTRICA RESPONSE – CODE MANAGER COMMENTS

Schedule XX, 1.3	The drafting in 1.3 is to make clear what 'migrated' means and that a Metering Point will be considered migrated even if only one of the agent appointments is successful. At this point the Metering Point would be settled using MHHS rules and messages would be sent via the DIP. There is no requirement defined in the migration design to retrospectively appoint the agent, therefore nothing specific has been included in the REC code drafting. In this scenario where the missing agent is a MOA, there are already regulatory requirements for the Supplier to resolve the situation. The Supplier would identify this following receipt of the missing agent report (IF-045). The Code Manager and RECCo acknowledge a change could be raised to include an explicit statement in the code, however do not consider this to materially impact the success of R0209 implementation and it is not specific to MHHS.
Schedule XX 2.8.13	The MHHS Programme design team has confirmed there is currently no intention to change the current MHHS design baseline, which can be found in MHHS-DEL963 - BPM-002 - Change of Service - Metering Service - Forward Migration v1.4, against which the REC code drafting has been created. The design captures that a de-appointment (D0151/MM00056) should be issued following receipt of the IF-0035 (Registration Service Appointment Status Notification) and not after the IF-036 (Service Provider Notification of Appointment). If a change to the MHHS design is approved at a later date, it would need to be reflected in the REC code drafting. This would be progressed via a separate Change Proposal. The risk identified that there could be no MOA appointed will partially be mitigated by the IF-045 (Registration Service Reminder Notification) process.

Schedule XX, 3	The D0052 is a Supplier to Data Collector message, therefore it is covered in the BSC drafting rather than in the REC.

Question 4:	WILL THERE BE ANY ADDITIONAL COSTS TO YOUR ORGANISATION FOR THE IMPLEMENTATION OF R0209, OVER AND ABOVE THE COSTS ALREADY CONSIDERED IN YOUR MHHS DELIVERY PLANS?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (DNO)	The changes associated with R0209 are being met as part of the requirements of the MHHS programme so there are no specific costs to this change.	Noted – Thank you.
EDF (Energy Supplier)	No	Noted – Thank you.
Centrica (Energy Supplier)	We do not expect any additional costs to implement R0209 than that already forecast in our MHHS delivery plans.	Noted – Thank you.
Scottish Power Energy Networks (DNO)	No additional costs identified.	Noted – Thank you.
Anonymous (MEM)	No	Noted – Thank you.
ScottishPower (Energy Supplier)	We have not identified additional implementation costs from this proposal to note at this stage.	Noted – Thank you.

Question 5:	DO YOU AGREE WITH THE PROPOSED IMPLEMENTATION APPROACH? IF NOT, PLEASE EXPLAIN WHY?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (DNO)	Yes	Noted – Thank you.
EDF (Energy Supplier)	Yes, we agree that a 'big bang' approach to implementation is appropriate.	Noted – Thank you.
Centrica (Energy Supplier)	Yes, we agree with the proposed implementation in line with the M8 milestone.	Noted – Thank you.
Scottish Power Energy Networks (DNO)	Yes, we agree with the proposed implementation approach and would stress that where any recalibration of the plan that is accepted by Ofgem is factored into this Change where relevant to ensure that all milestones remain in line with any revisions to the MHHS plan.	Noted – Thank you. The proposed implementation date has purposefully been tied to MHHS Programme Milestone M8, so that any changes in the MHHS Programme Plan will automatically apply to the implementation of this change.
Anonymous (MEM)	Yes	Noted – Thank you.
ScottishPower (Energy Supplier)	We are content with the current implementation approach for this proposal.	Noted – Thank you.

Question 6:	DO YOU AGREE WITH THE CODE MANAGER'S MINDED TO RECOMMENDATION THAT THIS CHANGE PROPOSAL SHOULD BE APPROVED FOR IMPLEMENTATION AT MHHS PROGRAMME MILESTONE M8? IF NOT, PLEASE EXPLAIN WHY?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (DNO)	Yes	Noted – Thank you.
EDF (Energy Supplier)	Yes, we agree that the changes should be implemented at MHHS Programme Milestone M8.	Noted – Thank you.
Centrica (Energy Supplier)	Yes, we agree.	Noted – Thank you.
Scottish Power Energy Networks (DNO)	Yes, we are in agreement with this, however as above this should be aligned to the MHHS Plan at all times and any revisions to key milestone dates must be reflected in the implementation of this change.	Noted – Thank you. The proposed implementation date has purposefully been tied to programme milestone M8, so that any changes in the MHHS Programme Plan will automatically apply to the implementation of this change.
Anonymous (MEM)	Yes, we agree	Noted – Thank you.
ScottishPower (Energy Supplier)	We are content with the current implementation timetable for this proposal.	Noted – Thank you.

Question 7:	DO YOU HAVE ANY OTHER COMMENTS RELATING TO THIS CHANGE PROPOSAL?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Northern Powergrid (DNO)	No	Noted – Thank you.
EDF (Energy Supplier)	No	Noted – Thank you.
Centrica (Energy Supplier)	No	Noted – Thank you.
Scottish Power Energy Networks (DNO)	No additional comments	Noted – Thank you.
Anonymous (MEM)	Schedule XX 2.7.16 does not match DEL963 or BSCP708, leaving this in would result in additional change requirements for our legacy systems and a mismatch between code documents and migration design.	This drafting was included as a result of the REC MHHS consequential changes, developed through REC MSAG rather than a direct requirement from the MHHS design. There were two consequential changes that cover the D0170: • REC-Owned Market Messages • Meter Technical Details Request

<table>
<tr>
<td></td>
<td></td>
<td>The code drafting for consequential changes has been included and consulted on as part of the overall MHHS code drafting.

The Code Manager will look into providing further clarity as part of the wider information on MHHS changes available to REC Parties.</td>
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<tr>
<td>ScottishPower (Energy Supplier)</td>
<td>Having reviewed the draft legal text, we have noted a small number of minor discrepancies which could be addressed at this stage. We have set out these points and our comments in the table below:

MHHS Implementation – ScottishPower Comments:
<table>
<tr><th>Schedule</th><th>Simplified Text</th><th>ScottishPower Comments</th></tr>
<tr><td>EES Service Definition [MHHSv1.0]</td><td>6.10. The EES Provider shall ensure its interface with the Data Integration Platform shall have 98% availability over each calendar month (excluding Scheduled Maintenance).</td><td>We note that the provision uses a “shall / shall” construction. Perhaps it would be clearer to state that: “The EES Provider shall ensure its interface with the Data Integration Platform has 98% availability …”</td></tr>
<tr><td>ERDS Service Definition [MHHSv1.0]</td><td>Interfaces to the GDCC Provider, Electricity</td><td>We note that the paragraph number for this provision</td></tr>
</table>
</td>
<td>Thank you for highlighting these for consideration.

The suggested amendments have been reviewed and the legal text for the following REC documents has been updated:

• Schedule 1
• Schedule 28
• Schedule 30
• Schedule XX
• EES Service Definition</td>
</tr>
</table>

		Suppliers and the MDDA utilise the Data Transfer Network for the transportation of Market Messages to and from a Data Transfer Network gateway within each DNO's estate. As such, a DNO is responsible for the transfer of Market Messages between its Data Transfer Network gateway and the ERDA.[4]	has been deleted. Perhaps it should be added back.		The ERDS Service Definition has not been amended. The reviewed text is intended as one paragraph relating to the DTN as follows: "4.3. Interfaces to the GDCC Provider, Electricity Suppliers and the MDDA utilise the Data Transfer Network for the transportation of Market Messages to and from a Data Transfer Network gateway within each DNO's estate. As such, a DNO is responsible for the transfer of Market Messages between its Data Transfer Network gateway and the ERDA. For the purposes of the Data Transfer Network, the ERDA and the SMRA are identified as the same Market Role Code within Industry Standing Data." This is what has been captured in the redlining.
	ERDS Service Definition [MHHSv1.0]	4.3. For the purposes of the Data Transfer Network, the ERDA and the SMRSA are identified as the same Market Role Code within Industry Standing Data.	In connection with the point above, perhaps the paragraph number for this provision should also be revised.		
	Schedule 1 (Interpretations and Definitions [MHHSv1.0])	Industry Standing Data – means, the central repository of reference data, maintained in accordance with the BSC, for use by electricity Market Participants.	We believe that the comma after "means" is not required.		
	Schedule 1 (Interpretations and Definitions [MHHSv1.0])	MHHS Migration Plan – means the plan as defined in the Balancing and Settlement Code and any associated documentation to include the migration	We believe that "the Balancing and Settlement Code" should instead be "the BSC" to match the convention in the rest of Schedule 1.		

		volumes set by the MHHS Programme.			
	Schedule 1 (Interpretations and Definitions [MHHSv1.0])	Market Domain Data – means, the central repository of reference data maintained in both electricity (for legacy settlement arrangements only) and gas, for use by respective Market Participants.	We believe that the comma after “means” is not required.		
	Schedule 28 (Related Metering Points [MHHSv1.0])	1.8 The Related Metering Point management process relies on messages sent between the Registered Supplier and the relevant Supplier Meter Registration Agent for MHHS Metering Points and Electricity Retail Data Agent for Non MHHS Metering Points, as described in Paragraphs 2, 3 and 4 of this REC Schedule.	We believe that “Non MHHS Metering Points” should instead be “Non-MHHS Metering Points”.		
	Schedule 30 (Resolution of CFSB Issues [MHHSv1.0])	9.9(d) for a Non-MHHS Metering Point, where supply is measured by a meter that is an Enrolled Smart Meter, both the Gaining Supplier and Losing Supplier shall submit the agreed Switch Meter Reading to their respective	We believe that “respective Data Collector’s” should instead be “respective Data Collectors”.		

		Data Collector's in accordance with the BSC.			
	Schedule XX (MHHS Migration)	1.4 For a Metering Point that has been MHHS Migrated (and which has not been MHHS Reverse Migrated), the standard processes for Appointing Meter Operator Agents shall be followed, as defined in the Metering Operations Schedule. For a Metering Point that has not been MHHS Migrated, the standard processes for Appointing Meter Operator Agents shall be followed, as defined in the MHHS Transition Schedule.	We note that this provision refers to the "MHHS Transition Schedule", yet we understand that such a schedule no longer exists. Perhaps this provision should be revised to match.		
	Schedule XX (MHHS Migration)	2.7.1 ... If the Gaining Supplier chooses not to migrate the Metering Point then it will Appoint the MOA in accordance with the process in the MHHS Transition Schedule	We note that this provision refers to the "MHHS Transition Schedule", yet we understand that such a schedule no longer exists. Perhaps this provision should be revised to match.		