RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	Final Recommendation

CHANGE REPORT

I0240 – DATA ALIGNMENT OF METER INFORMATION THROUGH MHHS MIGRATION

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	TBC
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	CHANGE PANEL	CHANGE PATH	SELF-GOVERNANCE
PRIORITY STATUS	HIGH	URGENCY	STANDARD
IMPACTED STAKEHOLDERS	ELECTRICITY CONSUMERS, ELECTRICITY METERING EQUIPMENT MANAGERS		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	ASSURANCE LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

This Issue looks to address that when Meter updates are made during a Market Wide Half-Hourly Settlement (MHHS) migration, whilst the Meter Technical Details (MTDs) will be shared between participants, there will be no update sent to the Registration Service as the Gaining Meter Operator Agent (MOA) will not know that they need to send a D0312 (for reverse migration) or IF005 (for forward migration) and the Losing MOA cannot send the message.

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BACKGROUND

1 SUMMARY

During the MHHS migration process, specific data flows between Market Participants and the Registration Service are being rejected, leading to potential data integrity issues. Once a forward migration is initiated (for example, via IF031 for a non-MHHS Metering Point), or a reverse migration is triggered (for example, via a Switch Request from a non-MHHS Qualified Supplier for an MHHS Metering Point), the Losing MOA is no longer permitted to send meter updates to the Registration Service via D0312 or IF005 respectively.

Although MTDs are shared between the Losing and Gaining MOAs as part of the agent change process, any subsequent updates to MTD, such as those resulting from meter work, may not be reflected in the Registration Service. This is because the Gaining MOA is unaware that an update has occurred and therefore does not send the necessary D0312 or IF005, while the Losing MOA is restricted from doing so.

Further complications arise in relation to Energisation status updates and Metering Point notifications. Messages such as the D0205 (Energisation status) and D0139 (Metering Point details) may also be rejected during migration, potentially resulting in misalignment between Market Participant systems and the Central Registration Service. It is unclear whether the MHHS equivalent message (IF-007) would also be rejected under these conditions.

This Issue presents a risk to data accuracy and operational consistency across the market and requires clarification and potential process changes to ensure that all relevant updates are captured and communicated effectively during the migration window. Primarily, there will be a misalignment in the data held with the Registration Service and that held between other industry Parties. In addition, the Registration Service could issue an incorrect PUB_036 to Parties which would need in updated MTD's being received from the MS and old MTD's from the Registration Service resulting in user intervention to correct the discrepancy.

This Issue is required to be resolved for MHHS Reversed Migration. Given that this may start impacting industry from M8/10, currently expected in September 2025, a solution is required to be developed as soon as practicable.

2 PROBLEM STATEMENT

During MHHS migration, key Market Messages from the Losing MOA, such as D0312, IF005, D0205, and D0139, are rejected by the Registration Service, preventing updates to meter details and Energisation status. This creates a risk of data misalignment, as the Gaining MOA may not be aware that updates occurred and therefore cannot resend them.

3 IMPACTS

CONSUMERS
All Electricity Consumers

REC SERVICE PROVIDERS
ERDAs (MPRS)
DIP Service

RECCO / REC CODE MANAGER
REC Performance Assurance

REC PARTIES AND SERVICE USERS
Electricity Metering Equipment Manager
Energy Suppliers

REC DOCUMENTS / PRODUCTS
Schedule 14 – Metering Operations
Schedule XX- MHHS Migration

MHHS
Any solution could impact Schedule 14 – Metering Operations and the MHHS Migration Schedule. Full impacts on MHHS Code Drafting will be determined once a solution has been developed.
This Issue will be required to be resolved for MHHS Reverse Migration. This could affect industry from the M8/M10 milestone.
If guidance is required, this Issue could impact the Metering Updates Guidance Documents. These documents offer a potential route for capturing guidance, rather than additions to Schedule 14 – Metering Operations or the MHHS Migration Schedule.

4 CROSS-CODE IMPACTS

This Issue affects the MHHS Programme, therefore there will be continued engagement between the Code Manager and the MHHS Programme to ensure this Issue is appropriately managed and progressed. The Code Manager will also remain in engagement with the Balancing and Settlement Code (BSC), in case any cross-code change with the BSC is required.

This Issue has previously been discussed, and will continue to be discussed, at the Cross-Code Steering Group. The CCSG will be kept up to date on the progression of this Issue to help determine any cross-code impacts and/or further changes required.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**07 Jul-25**	**31 Sept-25**
	Solution Analysis	July	September
	Solution Development	July	September

The Code Manager is only able to provide the Proposal Plan for the solution analysis and solution development activities at this stage. Once a solution has been developed, the Code Manager will be able to determine if and what impact assessments are required, and the timescales for the Change Proposal progression.

The Code Manager will provide an update to the Responsible Committee following the completion of the solution development.

6 STAKEHOLDER ENGAGEMENT

The solution development for this Issue will be progressed via the REC Change Issues Group. This Issue is also likely to include a Party impact assessment and a standard industry consultation.

These stakeholder engagement activities will be confirmed once the solution has been developed and shared with the Change Issues Group.

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	2	25	50
	Retail Markets Impact	Innovation and Market Arrangements	2	15	30
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	5	10
		Legal and Regulatory Compliance	1	13	13
Resource	Complexity / Effort / Duration		1	8	8
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	15	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		1		8
Urgency *(The need to progress a change to meet a targeted date)*		Significant Code Reviews	2	20	40
				Overall Priority Score (rounded)	165

Priority Status	HIGH
Change Proposal Type	STANDARD

This Issue has been given a priority status of high based upon a weighted prioritisation score of 165.

8 APPENDIX

CHANGE PROPOSAL	Link
ANY OTHER DOCUMENTS / LINKS	MHHS Programme Change Issues Group (June 2025)

9 GLOSSARY

TERM	DEFINITION
Term	Means yes
Balancing and Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
D0312	The D0312 is a notification of Meter information sent to MPAS (Meter Point Administration Service) by the Electricity Supplier. It includes a MOP (Meter Operator) Flow Response Code and can be sent electronically or by another agreed method. If the response to a D0312 is 'Accepted', the process proceeds or ends as specified. If not accepted, a corrected D0312 may be sent if the rejection can be resolved without involving other industry Parties.
D0205	The D0205 is a Market Message used for updating Registration details. It is referenced as MM00108 and is a supplier-initiated update of Registration details. The rules for including specific data items and the dependency between items are specified within the MRA and MPAS Validation Procedures
D0139	The D0139 is a Market Message flow that confirms that the Energisation Status of a Metering Point has been changed, or notifies that a change was not possible and gives the reason for failure. It is used in the context of Electricity Suppliers and Distribution Network Operators (DNOs) to confirm or reject changes in Energisation status.
Energise	shall have the meaning given under the DCUSA, and 'energised', 'energisation' and similar expressions shall be interpreted accordingly.
Electricity Retail Data Agent (ERDA)	means a provider of a DNO's Electricity Retail Data Service.

TERM	DEFINITION
Market Message	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
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 Technical Details (MTD)	means all the relevant information about Energy meters required by the Registered Energy Supplier, Supplier Agents, Distribution Network Operator and/or Gas Transporter to carry out its duties as such under this Code and other Energy Codes.
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.”
Metering Point Registration System (MPRS)	means the System used or procured by each DNO in order to provide the Electricity Retail Data Service in accordance with the REC and / or the Supplier Meter Registration Service in accordance with the BSC.
Registration Service	means the component of the Central Switching Service which records Switching Operation Data and manages Switches, as further described in the Switching Data Management Schedule and the Registration Services Schedule.