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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0241 – MHHS INCREMENTAL CHANGES FOR GO LIVE

On 17 June 2025 the Code Manager issued a consultation to industry to seek feedback on the Change Report for R0241.

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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LEAD ANALYST	HARRIET TRUSS

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Question 1:	DO YOU AGREE WITH THE PROPOSED SOLUTION TO IMPLEMENT THE UPDATED CODE DRAFTING DEVELOPED THROUGH I0241 AND ENDORSED BY THE MHHS PROGRAMME? IF NOT, PLEASE EXPLAIN WHY?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	We agree with the proposed solution and updated code drafting developed through I0241. Please see below our comments regarding the code drafting, we recommend a few minor changes: **"Schedule XX – MHHS Migration MHHSv1.3 for I0241":** **2.9 New Connection MHHS Migration - page 32** 2.9 – This section currently uses the term "Gaining Supplier" throughout, since this pertains to an initial registration, the correct term would be "Registering Supplier", as it does not involve a switch. The definition of "Gaining Supplier" under the REC is as follows *"means, in relation to a proposed switch (or switch), the Energy Supplier which is proposing to become the Registered Supplier at an RMP as a result of the proposed switch".* We suggest removing "Gaining Supplier" and replace with "Registering Supplier" to avoid any confusion. **3 MHHS Reverse Migration - page 39** Point 3.4 - *"In the case of Initial Registration there is no Losing Meter Operator Agent (or Advanced / Smart Data Service) and therefore the IF-003 (Notification of Reverse Migration and De-appointment) will only be issued to the Losing Supplier, Electricity Enquiry Service and DNO."*	Thank you for your response. The Code Manager and RECCo MHHS team have considered each point as follows: **Schedule XX – MHHS Migration MHHSv1.3 for I0241:** 2.9 New Connection MHHS Migration - page 32 The drafting is consistent with that used in the Registrations Schedule and is not an MHHS specific issue. However, we do recognise that the definition for Gaining Supplier is currently specific to a Switch. We propose that an update to the Gaining Supplier definition is progressed outside of MHHS so that it can consider the wider impact across the REC.

	There is not a losing supplier in an initial registration, this also contradicts 3.3 above, we suggest the removal of "Losing supplier". **3.9 New Connection Reverse Migration – page 47** 3.9 – We again recommend removing "Gaining Supplier" and replacing with "Registering Supplier" as this is not related to a switch, but an initial registration. 3.9.6 – *"Within the timescales set out in BSCP708, where the Appointment is taking effect."* There is no losing supplier as this is an initial registration, there is also no MOA de-appointment for the same reason. We suggest removing this. **"EES API Interface Specification MHHSv1.1 for I0241":** **9 Get Technical Details by Mpan – page 23** 9.5 Returned Technical Detail Data Items The data item "energisation_status", this should say that when the MPAN is registered (new connection) the value will be null for a pre-M10 MPAN and then de-energised for post-M10.	As it is not critical to MHHS Go-Live this will not be progressed through R0241 and the MHHS drafting. <u>3 MHHS Reverse Migration - page 39</u> We agree that the inclusion of Losing Supplier in the New Connections process is not appropriate and removal from 3.4 will reflect the MHHS design. The MHHS drafting will be updated as part of R0241. <u>3.9 New Connection Reverse Migration – page 47</u> As noted above in relation to 2.9, no updates will be progressed under R0241 in relation to 'Gaining Supplier'. Similarly to the above in relation to 3.4, we agree that removal of Losing Supplier from 3.9.6 is appropriate and the MHHS drafting will be updated as part of R0241. **EES API Interface Specification MHHSv1.1 for I0241:**

		9 Get Technical Details by Mpan – page 23 Although we agree with logic described in the response, this level of guidance isn't provided currently in this specification for any data items. As there is no technical impact, and it is not a critical change nor inconsistent with the MHHS design, no update will be made to the MHHS drafting under R0241. Inclusion of this type of guidance will be considered for a future improvement to the technical specification.
E.ON Next Energy Limited/ E.ON Energy Services UK LTD (Energy Supplier)	In the main we agree with the proposed solution with exception of the below specially: **Schedule XX - MHHS Migration MHHSv1.2** Following CR037 the steps 2.8.8 and 2.8.11 should reflect the proposed changes, whereby for any migration COA IF-033s received before 17.00 a MOA has until 23.00 to respond with the IF-034. A similar comment can also be made regarding steps 2.7.8 and 2.7.11, which refer to the COS appointments. Although CR037 specifically references COA migration, issues may arise with a 60 minute SLA. It is not clear on the rationale for having two different SLAs and until the IF-033 message is read by the recipient system to see the event codes of MCA/MCS, we would not be able to differentiate which IF-033 should be processed before another IF-033 which may have a tighter response	Thank you for your response. The Code Manager and RECCo MHHS team have discussed this with the MHHS Programme to verify the position. We have confirmed how to progress with Ofgem, as the Proposer. We agree that the drafting is currently incorrect for Change of Agent, MOA Appointments, as part of a migration and will update the drafting in Schedule XX under R0241 to align with the migration SLAs that were confirmed under Programme Change Request CR-037. However, for migrations via a Switch, the MHHS design states that BAU SLAs should

	time. This comment will also be followed up with the MHHS programme migration team.	apply for MOA Appointments, therefore no drafting update will be progressed.
National Grid Electricity Distribution (Distribution Network Operator (DNO))	Yes, we agree.	Noted – Thank you.
OVO Energy Ltd (Energy Supplier)	In principle yes. However we note that since R0241 has been in development, a further iteration of the MHHS Design (IR8.11) has been released. We consider that the R0241 legal text should be reviewed in light of IR8.11 to ensure alignment. It is not clear from the change report whether this has been done.	Thank you for the response. The REC MHHS team have reviewed all of the interim releases including IR8.11. We can confirm there are no impacts to the REC MHHS drafting from IR8.11, this will be noted in the Change Report.
Scottish Power Energy Networks (DNO)	SPEN are supportive of the update of the code drafting and believe that this provides clarity	Noted – Thank you.

Question 2:	DO YOU AGREE WITH THE PROPOSED IMPLEMENTATION APPROACH? IF NOT, PLEASE EXPLAIN WHY?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes, we agree with the proposed implementation approach.	Noted – Thank you.
E.ON Next Energy Limited/ E.ON Energy Services UK LTD (Energy Supplier)	Yes, we agree	Noted – Thank you.

National Grid Electricity Distribution (DNO)	Yes, we agree that the 'Big Bang' implementation approach is most suitable for this Change Proposal.	Noted – Thank you.
OVO Energy Ltd (Energy Supplier)	Yes.	Noted – Thank you.
Scottish Power Energy Networks (DNO)	Yes.	Noted – Thank you.

Question 3:	DO YOU AGREE WITH THE CODE MANAGER'S ASSESSMENT OF THE COSTS AND BENEFITS FOR THIS CHANGE?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes, we agree with the assessment of the costs and benefits.	Noted – Thank you.
E.ON Next Energy Limited/ E.ON Energy Services UK LTD (Energy Supplier)	Yes, we agree	Noted – Thank you.
National Grid Electricity Distribution (DNO)	Yes, we agree with the Code Manager's assessment of the costs and benefits for this change.	Noted – Thank you.
OVO Energy Ltd (Energy Supplier)	Yes.	Noted – Thank you.

Scottish Power Energy Networks (DNO)	Yes.	Noted – Thank you.

Question 4:	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**
Centrica (Energy Supplier)	Yes, we agree this change proposal should be approved for implementation at M8.	Noted – Thank you.
E.ON Next Energy Limited/ E.ON Energy Services UK LTD (Energy Supplier)	Yes we agree notwithstanding our comments in relation to Q1	Noted – Thank you.
National Grid Electricity Distribution (DNO)	Yes, we agree that this Change Proposal will need to be implemented at MHHS Milestone M8 to coincide with R0209.	Noted – Thank you.
OVO Energy Ltd (Energy Supplier)	Yes.	Noted – Thank you.
Scottish Power Energy Networks (DNO)	Yes.	Noted – Thank you.

Question 5:	DO YOU HAVE ANY OTHER COMMENTS RELATING TO THIS CHANGE PROPOSAL?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	No further comments.	N/a
E.ON Next Energy Limited/ E.ON Energy Services UK LTD (Energy Supplier)	No other comments	N/a
National Grid Electricity Distribution (DNO)	No further comments.	N/a
OVO Energy Ltd (Energy Supplier)	No.	N/a
Scottish Power Energy Networks (DNO)	No other comments.	N/a