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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0201 – CREATION OF A TOOL TO MANUALLY CORRECT ERDS/CSS DISCREPANCIES

On 8 November 2024 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for R0201 Creation of a tool to manually correct ERDS/CSS discrepancies.

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

DOCUMENT VERSION	1.0
RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	12/08/2025
RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Holly Law

DATE IMPACT ASSESSMENT ISSUED	08/11/2024
RESPONSE DEADLINE	29/11/2024

Information Request	**Please provide the monthly volumes (i.e. number of MPANs) for the last 6 months of instances you have noted that required manual correction to ensure data with CSS and MPRS are aligned.**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	BUUK have had 11 requests over the last 6 months to manually align CSS and MPRS.	Noted, thank you.
National Grid Electricity Distribution (Distribution Network Operator)	54 instances where there has been a misalignment identified and a required ERDS to replay a message. 14 instances where there has been a misalignment identified and a manual amendment required to ERDS (MPRS).	Noted, thank you.
Northern Powergrid (Distribution Network Operator)	In the last 6 months we have completed 10 manual corrections in MPRS to align with CSS data.	Noted, thank you.
Scottish Power Energy Networks (Distribution Network Operator)	Please see below the volumes of MPANs that we have required to apply a manual correction to align mismatched data between MPRS and CSS. This is the total across both of our MPIDs SPOW and MANW Jun-24 0 Jul-24 1 Aug-24 0 Sep-24 2	Noted, thank you.

	Oct-24 1 Nov-24 6 TOTAL 10	
SSE Energy Supply (Energy Supplier)	-	N/a
SSEN (Distribution Network Operator)	5 in total in the last 6 months	Noted, thank you.
St Clements (Other – MPRS ERDA Provider)	N/A	N/a
UK Power Networks (Distribution Network Operator)	N/A	N/a

Question 1:	**Do you have any comments on the proposed solution?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	We are aligned and support the response provided by St Clements, and support the implementation of this Modification Proposal.	Noted, thank you.
National Grid Electricity Distribution (Distribution Network Operator)	We believe that the ability to be able to re-align Registration Data where issues have been identified is critical to support the MHHS	Thank you for the response, the Code Manager will look into the option of CSS

	requirements to maintain accurate data and ensure there is a fully auditable process. If corrections were required without this automated functionality, these would require manual data fixes which, if possible, would carry a higher risk of error. The BSCP604 process which is currently used is an invaluable tool and we would fully support this functionality being made available within MHHS. However, our understanding of the introduction of a Central Switching Service is that it would facilitate reporting from a central source. Normally MPRS will generate an error message to CSS or CSS will reject an MPRS message and raise a Service Now Ticket, with both scenarios resulting in a Service Now ticket. This seems like the more appropriate source for the reporting requirements detailed in the Solution Development Report, rather than ERDS providing the reports. Under the Annual BSC Audit, we currently have an audit requirement to evidence retrospective amendments. During development of the MHHS changes there was significant feedback from Suppliers preferring a more automated solution which does not require Services being reappointed through BAU flows. Will Suppliers be consulted on the solution again to avoid a late vote rejection/redesign of the solution?	reporting once R0224 - Agile Reporting within CSS has been delivered – the implementation date has not yet been determined. This, and the associated BSC change are being consulted on under both the REC and the BSC.
Northern Powergrid (Distribution Network Operator)	The solution addresses the need for continuation of a manual amendment tool within the MPRS application, as per MHHS CR045 discussions with the programme and St Clements.	Thank you for the response, the Code Manager will look into the option of CSS reporting once R0224 - Agile Reporting within CSS has been delivered – the

	This will ensure data corrections can be completed and alignment issues with data are addressed within a regulatory requirement. We do note though that reporting would be better suited from ServiceNow than ERDS due to the ability for both CSS and MPRS to generate error tickets.	implementation date has not yet been determined.
Scottish Power Energy Networks (Distribution Network Operator)	We are not supportive of the Performance Assurance element of the proposed solution. Under the current process these scenarios result in incidents being raised in the CSS Service Management system. This allows for the relevant tracking of initial response and actual resolution times for the ERDS, this also provides an audit trail of action taken. We see no rationale in the DNO providing manual monthly reports when this information should be available from the existing incidents, this would be an additional ongoing burden on each DNO to provide what is essentially duplication of information already available in the CSS systems. This could also be subject to manual error. We are supportive of the tracking and monitoring of these scenarios (assuming that the volumes that have been previously stated stack up in the risk assessment), we would suggest that the existing reports are assessed for any changes that can allow these to be utilised for the monitoring purposes required. In terms of the proposal to allow the ERDS to make manual changes to allow the alignment of data between CSS and ERDS, we are supportive of this proposal however this does not cover all scenarios.	Thank you for the response. We currently do not have any related reports which could be used, the Code Manager will look into the option of CSS reporting once R0224 - Agile Reporting within CSS has been delivered – the implementation date has not yet been determined.
SSE Energy Supply (Energy Supplier)	No.	N/a

SSEN (Distribution Network Operator)	As the volume of exceptions is very low and CSS Service Now tickets are produced and sent between parties for correction this may be a more cost-effective solution than MPRS having a new report created.	We currently do not have any related reports which could be used, the Code Manager will look into the option of CSS reporting once R0224 - Agile Reporting within CSS has been delivered – the implementation date has not yet been determined.
St Clements (Other – MPRS ERDA Provider)	Normally MPRS will generate an error message to CSS or CSS will reject an MPRS message and raise a Service Now Ticket with both scenarios result in a Service Now ticket. This seems like the more appropriate source for the reporting requirements detailed in the Solution Development Report, rather than ERDS providing the reports. During development of the MHHS changes there was significant feedback from Suppliers preferring a more automated solution which does not require Services being reappointed through BAU flows. Will Suppliers be consulted on the solution again to avoid a late vote rejection/redesign of the solution?	We currently do not have any related reports which could be used, the Code Manager will look into the option of CSS reporting once R0224 - Agile Reporting within CSS has been delivered – the implementation date has not yet been determined. The solution was consulted on under BSC CP1606. The majority of respondents (5/6) agreed with the proposed solution.
UK Power Networks (Distribution Network Operator)	-	N/a

Question 2:	**Do you believe the proposed solution can be applied to Related Metering Points and Associated Import / Export which may have different Registered Suppliers.**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	-	N/a
National Grid Electricity Distribution (Distribution Network Operator)	MPRS will use the service alignment functionality to de-appoint the services from the relevant Associated and Related MPANs.	Noted, thank you.
Northern Powergrid (Distribution Network Operator)	The tool may also be useful for completing amendments within MPRS to the data items to correct associated values for different suppliers and agents in MPANs relationship or association scenarios.	Noted, thank you.
Scottish Power Energy Networks (Distribution Network Operator)	Yes, MPRS will use the service alignment functionality to de-appoint the services from the relevant Associated and Related MPANs.	Noted, thank you.
SSE Energy Supply (Energy Supplier)	We see no reason why the proposed solution should not be applied to Related Metering Points or Import / Export Supplies.	Noted, thank you.
SSEN (Distribution Network Operator)	St Clements Services the MPRS developer has confirmed MPRS will manage related and associated MPANs.	Noted, thank you.
St Clements (Other – MPRS ERDA Provider)	MPRS will use the service alignment functionality to de-appoint the services from the relevant Associated and Related MPANs	Noted, thank you.
UK Power Networks (Distribution Network Operator)	MPRS functionality should allow this to happen to de-appoint the services from the relevant Associated and Related MPANs.	Noted, thank you.

Question 3:	Do you think we have identified and considered all processes and scenarios that may be impacted through the implementation of the proposed change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	-	N/a
National Grid Electricity Distribution (Distribution Network Operator)	We believe that a solution is also required for MHHS Migration where there is a switch and a subsequent reverse migration. Currently the proposed solution only covers business as usual MHHS.	Thank you for your response. We believe that this would be an edge case where there is a CSS issue resulting in missed messages for a Metering Point that is going through a Reverse Migration on that specific day. Our assumption is that for reverse migrated Metering Points the current manual correction mechanism will still be available as for other non-MHHS Metering Points and are awaiting confirmation from the MPRS provider. As there is a limited window between the proposed implementation of R0201 (March 2026) and the point at which Metering Points can no longer be reverse migrated (M14 – October 2026), the Code Manager does not support updating the solution to include a migration solution.

Northern Powergrid (Distribution Network Operator)	We believe that consideration has been suitably given to impacts related to MHHS BAU process, but that consideration is still required for migration activity. The party Impact Assessment will be required to confirm further views and impacts, including an appropriate period for suppliers to review and make comments on the change.	Please see Code Manager response above on migration This response has been received under Party IA. A further opportunity to review the end to end solution was provided under the BSC CP1606 consultation and will be available in the R0201 consultation.
SSE Energy Supply (Energy Supplier)	R0201 does not appear to cover processes at all, we expect that the BSC Solution will cover the necessary processes as they appear to be out of scope of R0201.	As suggested the BSC CP1606 solution covers the business processes for the end to end solution.
SSEN (Distribution Network Operator)	The solution covers BAU processes but Migrations both forward and reverse need a solution also.	Please see Code Manager response above on migration
UK Power Networks (Distribution Network Operator)	-	N/a

Question 4:	**Do you agree the proposed solution addresses the problem statement? If not, please provide details.**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	-	N/a

National Grid Electricity Distribution (Distribution Network Operator)	Whilst the amendments to the schedules outlined in the solution statement would clarify the obligations, there is still the requirement to build the practical solution of additional MHHS Dip messages and the functionality which is not fully explored within this CR R0201 therefore it is unclear if the proposed solution contained within the solution document fully addresses the problem statement.	BSC CP1606 solution covers the business processes for the end to end solution.
Northern Powergrid (Distribution Network Operator)	We agree with the solution in relation to the problem statement.	Noted, thank you.
Scottish Power Energy Networks (Distribution Network Operator)	We do not believe that as written the proposal addresses the problem statement, please reference response to questions 1 & 3.	Please see responses to questions 1 & 3
SSE Energy Supply (Energy Supplier)	R0201 only addresses the problem statement in conjunction with the REC Solution.	BSC CP1606 solution covers the business processes for the end to end solution.
SSEN (Distribution Network Operator)	Agreed	Noted, thank you.
St Clements (Other – MPRS ERDA Provider)	N/A	N/a
UK Power Networks (Distribution Network Operator)	N/A	N/a

Question 5:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	-	N/a
National Grid Electricity Distribution (Distribution Network Operator)	We have no comments on the proposed legal text.	N/a
Northern Powergrid (Distribution Network Operator)	N/A	N/a
Scottish Power Energy Networks (Distribution Network Operator)	The proposed legal text for 11.5 does not specify that this is for registration data alignment. As written, this implies that the ERDS is responsible for any misalignment update. There are instances where the CSS/ERDS are not masters of the data and although a request can be made to another party to update information, the ERDS has no control over this. As written, we believe that this exposes ERDS to areas where we have no control. We believe that this section should be amended to avoid ambiguity in this respect. We have not identified any issue with the legal text, however the text in relation to Schedule 14 relates more to Supplier and MOP than DNO, but it seems to follow the intent of the proposal.	Thank you for the response ERDS Service Definition – this has been reviewed by the Code Manager and the proposed legal text has not been updated.
SSE Energy Supply (Energy Supplier)	No	N/a
SSEN (Distribution Network Operator)	Nothing at this time.	Noted, thank you.
St Clements (Other – MPRS ERDA Provider)	N/A	N/a

UK Power Networks (Distribution Network Operator)	N/A	N/a

Question 6:	**Do you agree with the assumption that there is no need for end-to-end testing and instead will rely on internal (PIT) testing at the DNO.**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	-	N/a
National Grid Electricity Distribution (Distribution Network Operator)	Yes assuming that the practical solution to implement this obligation, which is not included within this CR R0201, is Agreed.	Noted, thank you.
Northern Powergrid (Distribution Network Operator)	Yes, we agree that PIT testing will be sufficient to ensure that the tool operates as expected.	Noted, thank you.
Scottish Power Energy Networks (Distribution Network Operator)	We are confident that there is no need for end-to-end testing and that internal DNO testing would be sufficient.	Noted, thank you.
SSE Energy Supply (Energy Supplier)	Without detail in the end-to-end Process that we are expecting BSC to provide we cannot see how testing could be carried out. We therefore agree that there will be no need for end-to-end testing.	Noted, thank you.
SSEN (Distribution Network Operator)	Agreed.	Noted, thank you.
St Clements (Other – MPRS ERDA Provider)	Yes	Noted, thank you.
UK Power Networks (Distribution Network Operator)	Yes	Noted, thank you.

Question 7:	**What lead time would be required for your business to implement the proposed solution? Please provide justification.**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	-	N/a
National Grid Electricity Distribution (Distribution Network Operator)	Our Service Provider has advised that Development & Testing of the solution before delivery to LDSOs was estimated as part of MHHS CR045 at 116 Days. R0201 adds further Reporting Requirements which will increase this impact (the design for these reports is not known), although we recommend that these requirements are placed on Service Now. In addition, we will need further time on top of this (normally 3 months) to test and implement. Although supportive of this functionality, due to existing MHHS programme commitments and the magnitude of this change (estimated 116+ man days to deliver), our Service Provider has stated that there is no capacity to deliver this functionality prior to the M10 milestone without negatively impacting other MHHS deliverables. A more realistic timeline is to develop this functionality to go live in the early months following M10 (when migration volumes are expected to be low).	Thank you for the response. The St. Clements response to the BSC Consultation, which has a reduced scope compared to the end to end solution considered in the R0201 impact assessment, has confirmed a revised estimated lead time of 49 days rather than 116. The revised timelines will be the baseline for the proposed implementation date.
Northern Powergrid (Distribution Network Operator)	We require a 6-month period to test and implement the solution following receipt of the MPRS code update from St Clements Services, which will not be developed prior to the MHHS programme M10 milestone due to current commitments for testing and development.	Thank you for the response.

		The St. Clements response to the BSC Consultation, which has a reduced scope compared to the end to end solution considered in the R0201 impact assessment, has confirmed a revised estimated lead time of 49 days rather than 116. The revised timelines will be the baseline for the proposed implementation date.
SSE Energy Supply (Energy Supplier)	Lead time for this change would be minimal, however it should not come into effect until after MHHS implementation.	Noted, thank you.
SSEN (Distribution Network Operator)	SSEN's solution is dependent on SCS and the delivery of MPRS. SSEN will then need additional time to be determined to implement the change internally.	Noted, thank you.

Question 8:	**Would implementing the proposed solution incur any costs to your business? If so, please provide details.**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	-	N/a
National Grid Electricity Distribution (Distribution Network Operator)	Yes we would incur costs from our Service Provider to develop and test the proposed solution, together with costs incurred to develop and test the reporting requirements which are still to be decided, although we believe an alternate solution would be to generate reports out of a central source such as the CSS. There will be additional costs, as yet	Noted, thank you.

	unknown, with the associated BSC changes which although not included within this CR R0201, should be a consideration of the overall solution impact to parties.	
SSE Energy Supply (Energy Supplier)	Whilst we cannot be sure until our MHHS solution is in place, we would expect any costs to be minimal.	Noted, thank you.
SSEN (Distribution Network Operator)	This change will add costs but they are unable to be determined until the size of the MPRS release is known i.e. a patch or full release.	Noted, thank you.

Question 9:	**Do you identify any benefits to your business through the implementation of the proposed solution?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	-	N/a
National Grid Electricity Distribution (Distribution Network Operator)	Whilst we understand the need to monitor this functionality, we would question the requirement for the ERDA to provide the required reporting. It would be more efficient for this reporting to be sourced from a central system. However, we are supportive of the change to have the ability to be able to re-align Registration Data where issues have been identified via an automated functionality as this would enable corrections to be undertaken quickly and accurately thereby reducing impacts on consumers' ability to switch suppliers. There is a risk that if an issue was identified and this automated functionality was not available and required a manual data fix, this could cause customer	Noted, thank you.

	detriment due to a potential delay in the manual fix being deployed and notification of the correction to other parties.	
Northern Powergrid (Distribution Network Operator)	Essential tool for data correction and avoidance of alignment issues.	Noted, thank you.
Scottish Power Energy Networks (Distribution Network Operator)	We have not identified any benefits to our business with the implementation of this solution as it stands.	Noted, thank you.
SSE Energy Supply (Energy Supplier)	This change should provide the means to introduce a process to correct agent appointments following a mismatch between CSS and ERDS, this will help us prevent Settlement and Billing errors.	Noted, thank you.
SSEN (Distribution Network Operator)	N/A	N/a
St Clements (Other – MPRS ERDA Provider)	N/A	N/a
UK Power Networks (Distribution Network Operator)	N/A	N/a

Question 10:	**Taking into consideration both the costs and the benefits seen by your organisation, do you consider this change should be made?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)	Yes	Noted, thank you.
National Grid Electricity Distribution	Whilst we understand the need to monitor this functionality, we would question the requirement for the ERDA to provide the required	Noted, thank you.

(Distribution Network Operator)	reporting. It would be more efficient for this reporting to be sourced from a central system. However, we are supportive of the change to have the ability to be able to re-align Registration Data where issues have been identified via an automated functionality as this would enable corrections to be undertaken quickly and accurately thereby reducing impacts on consumers' ability to switch suppliers. There is a risk that if an issue was identified and this automated functionality was not available and required a manual data fix, this could cause customer detriment due to a potential delay in the manual fix being deployed and notification of the correction to other parties. Therefore whilst we are supportive of the concept of the change we are not supportive of the total solution to introduce a requirement for ERDA to provide individual reporting.	
Northern Powergrid (Distribution Network Operator)	We agree with the change, on reviewing benefits and cost the risk of data alignment issues and impacts to data is critical.	Noted, thank you.
Scottish Power Energy Networks (Distribution Network Operator)	We are of the view that a change needs to be made to ensure that data is aligned and appropriate updates are provided to relevant parties, however we do not believe that this change as written covers the requirements for the MHHS delivery in its entirely, there are gaps that require to be included to ensure that there is no detriment to customers, as previously mentioned reverse migration/forward migration and switching also need to be considered. We are also of the view that further analysis of the CSS incident management process is requires to assess the utilisation of this rather than individual DNO's sending manual reports.	Noted, thank you.
SSE Energy Supply (Energy Supplier)	Yes	Noted, thank you.

SSEN (Distribution Network Operator)	SSEN agrees the change should be made but at an appropriate time post MHHS go-live.	Noted, thank you.
St Clements (Other – MPRS ERDA Provider)	N/A	N/a
UK Power Networks (Distribution Network Operator)	N/A	N/a

Question 11:	**Do you have any other comments relating to this Change Proposal?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
BUUK (Distribution Network Operator)		N/a
National Grid Electricity Distribution (Distribution Network Operator)	No comments.	N/a
Northern Powergrid (Distribution Network Operator)	No comments.	N/a
Scottish Power Energy Networks (Distribution Network Operator)	It is critical that Suppliers are mandated to support this approach if implemented. When the data is corrected in ERDS will there be monitoring/tracking in place to ensure that the proposal is adhered to through the full process, with suppliers appointing the agents to ensure no downstream misalignment?	Thank you for the response. Introduction of the IF045 'SMRS Reminder Notification' under MHHS gives us the opportunity to monitor Supplier performance when it comes to timely agent appointment. We have been working with the DIP Manager

		to access the required reports to monitor this. Once those arrangements are agreed, we will update the PARC and introduce the new risk drivers.
SSE Energy Supply (Energy Supplier)	No.	N/a
SSEN (Distribution Network Operator)	Not at this time.	N/a
St Clements (Other – MPRS ERDA Provider)	It is critical that Suppliers are mandated to support this approach if implemented. The D0204 was not always supported which led to misalignment in some Supplier systems.	Thank you for the response. Introduction of the IF045 'SMRS Reminder Notification' under MHHS gives us the opportunity to monitor Supplier performance when it comes to timely agent appointment. We have been working with the DIP Manager to access the required reports to monitor this. Once those arrangements are agreed, we will update the PARC and introduce the new risk drivers. D0204 'Selective or Full Refresh of MPAS Details' is a BSC flow and there are no obligations under the REC on Suppliers in relation to the Market Message.
UK Power Networks (Distribution Network Operator)	N/A	N/a