RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	**Final Recommendation**

CHANGE REPORT

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

DOCUMENT VERSION	1.0
PROPOSED IMPLEMENTATION DATE	27 March 2026
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	CHANGE PANEL	**CHANGE PATH**	SELF-GOVERNANCE
PRIORITY STATUS	HIGH	**URGENCY**	STANDARD
IMPACTED STAKEHOLDERS	ENERGY SUPPLIERS, METERING EQUIPMENT MANAGERS, ERDS PROVIDER, CSS PROVIDER		

LEAD ANALYST	TECHNICAL LEAD	ASSURANCE LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

This Change seeks to create a new tool to allow the manual correction of data discrepancies in the Electricity Retail Data Service (ERDS) and Central Switching Service (CSS) systems, post Market-Wide Half Hourly Settlement (MHHS) implementation.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 27 March 2026.

RETAIL ENERGY CODE

CONTENTS

1 Summary 3
2 Problem Statement 4
3 Impacts 4
4 Cross-Code Impacts 5
5 Proposal plan 5
6 Stakeholder Engagement 6
7 Priority Status and Urgency 6
8 Summary of Analysis Undertaken 6
9 Proposed Solution 7
10 Draft Legal Text 7
11 Summary of Impact Assessment Activity 7
12 Risks, Assumptions, Issues and Dependencies 8
13 Business Case Assessment 11
14 Case for Change 12
15 Summary of Consultation Responses 12
16 Summary of Amendments Made Following Consultation 12
17 Appendix 13
18 Glossary 13

RETAIL ENERGY CODE

BACKGROUND

1 SUMMARY

Distribution Network Operators (DNOs), in their role as an Electricity Retail Data Agent (ERDA) currently use a tool to manually update supplier Registration Data to reflect the correct supplier Registration with the correct Effective From Date, however, during Market-Wide Half Hourly Settlement (MHHS) design discussions, concerns were raised regarding the lack of a manual correction mechanism.

Current Position

The Central Switching Service (CSS) is the master of supplier Registration Data e.g. the supplier responsible for the Metering Point. CSS and Electricity Retail Data Service (ERDS) discrepancies can arise where the secured active or cancellation notification is not issued by CSS (missing messages) or the secured active notification is not accepted by the ERDS.

Where issues arise, there is currently no mechanism designed into the system for supplier Registration Data to be retrospectively corrected therefore manual correction is required.

In addition to the correction tool used by DNOs to manually update supplier Registration Data, Energy Suppliers also have to appoint Supplier Agents bilaterally; however, details will not be captured until the ERDS has been corrected. A D0204/ MM00107 Market Message is sent (from ERDS) to inform the Energy Supplier of the changes and a D0209/ MM00109 Market Message to notify the Data Aggregator and Elexon Central Systems.

It is understood that there are currently approximately 100 manual corrections per month (across all DNOs) - Note that this mechanism is not defined within the REC.

As the supplier Registration is applied retrospectively, the Effective From Date is aligned across ERDS and CSS. Any correction will be captured through a future Settlement run.

MHHS Position

The Switching Arrangements are based on the principle that CSS is the master of Switching Registration data, therefore all Switching Data Service Providers should reflect the supplier Registration held by the CSS.

Pre-MHHS, there is a mechanism in place to ensure that missing supplier Registrations are reflected in ERDS should the systems become misaligned (as per current position above). MHHS doesn't replicate this mechanism therefore there is no manual work around to correct data.

Under MHHS arrangements a missing supplier Registration will prevent Supplier Agents from being appointed. From a REC perspective this relates to Meter Operator Agents (MOAs) and may prevent metering activity from being carried out. This is a known exception which occurs regularly today, with DNOs reportedly being required to correct several hundred of these exceptions each month. Any delay in implementing a mechanism to correct these exceptions for

MHHS Migrated Metering Points will therefore result in an increasing backlog of erroneous switching data in the DNO's Supplier Meter Registration Service (SMRS).

Whilst MHHS CR-045 'Supply Start Date (SSD) Correction Tool' covered additional messaging to Parties to de-appoint erroneous agents and to inform Market Participants of the revised supplier Registration, these are out of scope for the REC and would therefore expect an equivalent change to be progressed under the BSC to include these changes.

Should the REC change be implemented without the changes to SMRS requirements, it would be expected that the missed supplier Registration would become effective retrospectively and the supplier to appoint the required Supplier Agents without relying on the MHHSP IF-001 Notification of Change of Supplier. The supplier should be aware of the Registration based on CSS messages and would likely be managing lapsed Supplier Agent appointment requests. However, this would not enable Settlement data to be corrected.

The MHHS Programme, in conjunction with St Clements have identified a solution to address the issue and raised CR-045. Based on the limited time available before M10 (the implementation of MHHS system changes), CR-045 was rejected by the MHHS Programme, however it was noted that parties were supportive of the change and agreed that it should be passed to code bodies to deliver through the BAU change processes.

2 PROBLEM STATEMENT

There are instances where ERDS (and SMRS under BSC governance) can be misaligned with the CSS, and under the MHHS arrangements there is no mechanism for manual correction which is in place today. From MHHS go live the supplier will not be able to appoint their preferred agents. This issue only applies to MHHS Migrated Metering Points as the existing mechanism for manually correcting data would be used if the issue related to a non-migrated Metering Point.

In the event that the supplier cannot appoint its agents, this may prevent the supplier from accurately billing the Consumer.

The potential impact will increase as MHHS Migration continues, with more MHHS Metering Points potentially impacted by any CSS / ERDS discrepancy.

3 IMPACTS

CONSUMERS
Electricity

REC SERVICE PROVIDERS
CSS Provider
ERDS Provider

RECCO / REC CODE MANAGER
REC Performance Assurance (RPA)

REC PARTIES AND SERVICE USERS
DNOs

REC DOCUMENTS / PRODUCTS
ERDS Service Definition

Energy Suppliers	Schedule 14 – Metering Operations Performance Assurance Reporting Catalogue (PARC)

MHHS DESIGN	MHHS DATA SPECIFICATION	MHHS CODE DRAFTING
No impact	No impact	Indirect impact - ERDS Service Definition

The REC Performance Assurance team assessed this proposal against the Performance Assurance Framework (PAF) and other related processes and have highlighted that they believe it will have an impact on the services provided by RPA due to impacts on Retail Risk 13 - Retail consumers have a negative consumer experience as part of the metering works conducted.

4 CROSS-CODE IMPACTS

The ERDS (governed under the REC) and Supplier Meter Registration Service (SMRS) (governed under the BSC), use the same underlying, Metering Point Registration System (MPRS). Therefore, this misalignment also applies to SMRS.

A change in the REC can only cover the correction of data within ERDS. A BSC change (CP1606) has been raised to deliver the CR-045 proposed changes.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**01-Aug-24**	**03-Mar-25**
	Solution Development	August	August
	Impact Assessment	November	November
	Solution Refinement	January	February
Change Proposal		**04-Mar-25**	**07-Oct-25**
	Business Case Assessment	June	July
	Update Responsible Committee	August	August
	Consultation	August	September
	Final Determination	October	October
Voting		**07-Oct-25**	**07-Oct-25**

6 STAKEHOLDER ENGAGEMENT

This change was presented at the Change Issues Group on the 01 August 2024 under MHHS CR-045, to consider the solution in the REC and whether it should be reliant on an aligned progression with an associated BSC Change. Discussions were had between RECCo, Elexon, the MHHS Programme and St Clements and was shared at the Cross Code Steering Group (CCSG) for information. It was also presented for discussion at the Technical Change Workshop on 20 August.

Energy Suppliers, DNOs and Service Providers have been identified as impacted by this proposal. A 15 Working Day (WD) Party impact assessment was issued in November, to give impacted Market Participants and Service Providers sufficient time to assess the proposed solution and respond to the impact assessment.

A preliminary assessment was carried out following the impact assessment, which considered impact assessment responses and the case for change to develop the Code Manager's recommendation.

The Code Manager has been working with the BSC to align timelines for this Change Proposal and their equivalent.

7 PRIORITY STATUS AND URGENCY

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	1	27	27
	Retail Markets Impact	Retail Risk(s)	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	3	14	43
Resource	Complexity / Effort / Duration		2	9	18
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		2		17
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	2	10	20
				Overall Priority Score (rounded)	163

Priority Status	HIGH
Change Proposal Type	STANDARD

SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

This issue was initially discussed by the MHHS Programme when CR-045 was raised and impact assessed. Following CR-045 being rejected it was agreed that it should be passed to code bodies to deliver through the change processes at the earliest feasible implementation date.

The MHHS Programme have worked with St Clements and to identify a solution to address the issue.

Whilst the REC change can place an obligation on the ERDA to correct data, a parallel BSC change is also required to introduce the new business process elements, with Data Integration Platform (DIP) Market Messages issued to participants once the registration data is corrected.

9 PROPOSED SOLUTION

The current mechanism for manual correction of supplier Registration Data is not defined in the REC. Therefore, given the position set out within the MHHS Design which prevents this data being updated retrospectively, changes are proposed to the ERDS Service Definition and Schedule 14 – Metering Operations.

The transition to MHHS arrangements increases reliance on information held by the ERDS within the Registration Service systems. Misalignment of data between CSS and the Registration Service systems increases the risk that on a switch, an appropriate MEM is not appointed to the Metering Point on time leading to issues impacting the Consumer. To monitor and manage this risk, high-level reporting requirements for Performance Assurance are being developed. The ERDS Provider will be required to report on the instances of data alignment identified during a period for risk monitoring. The specific requirements such as the format, template or frequency of the report will be specified as the PARC changes are developed, however an indicative summary of the expected reporting requirements has been provided.

In addition, DNOs will be required to implement the tool by the implementation date of this proposal. On an ongoing basis DNOs will be required to actively identify and resolve discrepancies.

A solution development report can be found here.

10 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0201 can be found here.

PRELIMINARY ASSESSMENT

11 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

11.1 PARTY IMPACT ASSESSMENTS

A party impact assessment was issued on 8 November 2024. In total eight responses were received from one Energy Supplier, six DNOs and one response from the MPRS Provider.

ENERGY SUPPLIERS	• Supported that the solution should be applied to both Related Metering Points & Import/Export supplies. • All responses supported the proposed legal text and solution. • Supported that there is no need for end-to-end testing. • Noted that lead time would be minimal. • Noted that implementation should be after MHHS go live M8/M10. • Costs would be minimal.

	• Benefits identified were prevention of Settlement and billing errors.
DISTRIBUTION NETWORK OPERATORS	• Provided volumes of required manual corrections to support the business case (up to six per month). • All responses provided supported the proposed change. • Several responses identified a potential requirement for the solution to be provided during MHHS migration. • Several responses challenged the ERDA based reporting solution and suggested that CSS Service Now reporting should be used instead. • The dependency between this solution and the BSC solution was highlighted. • Supported that the solution should be applied to both Related Metering Points & Import/Export supplies. • One response suggested an amendment to the legal text for the ERDS Service Definition was needed, no other comments were provided on the legal text. • Supported that there is no need for end-to-end testing. • Responses around lead time pointed to the MPRS Provider lead time plus up to an additional six months for test and implementation. • Confirmed there would be costs to implement in addition to the MPRS Provider costs. The costs that were provided were marked confidential.
MPRS PROVIDER	• Identified a potential requirement for the solution to be provided during MHHS migration. • Challenged the ERDA based reporting solution and suggested that CSS Service Now reporting should be used instead. • Supported that the solution should be applied to both Related Metering Points & Import/Export supplies. • Supported that there is no need for end-to-end testing. • The lead time that was provided for this impact assessment was 116+ days. This was revised however, under the BSC CP1606 to 49 days. • Costs were provided and were marked confidential.

12 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

12.1 RISKS AND ISSUES

NO.	RISK	NOTES	MITIGATION
R1	DNOs will not implement the tool by the		Obligation to be defined in the legal text.

	implementation date of this proposal.		
R2	DNOs will not actively identify and resolve discrepancies.		Obligation to be defined in the legal text.
R3	Demand for support to parties during the early months following MHHS Go Live may impact the MPRS provider's capacity to develop a solution by March 2026	Support will be using the same resource as would be involved in developing this CP solution.	Code Manager to monitor as part of release activities
R4	Should there be an incident where there are inconsistencies to resolve between CSS and ERDS the resolution will be more challenging, it may be that migrated meter points cannot be resolved until the implementation of this tool in March 2026.	Noted at PAB on 30/09/2025	Should any such incident occur RECCo and Code Manager will do the following: Initiate a cross Party resolution group, with representatives of DCC, RECCo and the Code Manager. If relevant this will also involve DNOs, Elexon or other stakeholders. Utilise the improved system documentation developed by DCC in response to the major switching incident in developing an appropriate action plan. Provide to the PAB (or the Switching Change Advisory Board) updates on this plan. If there are decisions required on the way forwards (for example if REC Parties cannot agree on an agreed set of actions), and the associated risks are significant. This will be promptly raised for resolution to the PAB.

NO.	ISSUE	NOTES	HOW TO PROGRESS
I1	Market Participants have previously raised concerns with implementation of this change before M10 due to MHHS design, build and test priorities.	The Programme does not share individual IAs publicly. However, the CR-045 impact assessment Report gives a summary of the responses.	Closed

12.2 ASSUMPTIONS AND DEPENDENCIES

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A1	There is no need for end-to-end testing and will rely on internal (PIT) testing at the DNO.	RECCo suggested at the Change Issues Group that they did not expect this change to require end-to-end testing. The Energy Software Solutions representative agreed, suggesting that a key issue with CR-045 had been testing on a market-wide scale.	Closed, validated at impact assessment.
A2	Elexon can process the retrospective messages as they have no validation on these.		To be confirmed by Elexon.
A3	Programme milestone M6, will be met on the 23 August 2024.		Closed.
A4	Pre work carried out, not by the Code Manager is accurate.		Closed – solution and assessment progressed under the programme updated and validated under R0201 impact assessment and BSC CP 1606 consultation.

NO.	DEPENDENCY	NOTES	STATUS
D1	The parallel BSC change should be considered. Whilst it may be feasible to implement the REC CP independently, delivery efficiencies may be gained with parallel implementation.		Closed, the REC and BSC Change Plans are aligned.

13 BUSINESS CASE ASSESSMENT

13.1 COSTS

COSTS	DESIGN/ DEVELOPMENT/ IMPLEMENTATION COSTS	ONGOING OPERATIONAL COSTS
SUPPLIERS/ DNOS/ MPRS PROVIDER	c£1,240,000 - £2,048,000	None provided

These are the total costs that would be distributed across all 40 DNOs & IDNOs in their role as ERDAs. They have been estimated based on the costs of implementation for the correction tool plus a cost range for all DNOs based on the lower and upper limits provided in their responses.

13.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
REDUCTION IN SETTLEMENT AND BILLING ERRORS	This change will provide the means to introduce a process to correct agent appointments following a mismatch between CSS and ERDS, this will help prevent Settlement and billing errors.
DATA ACCURACY	MHHS Migrated Metering Points will result in an increasing backlog of erroneous switching data in the DNO's SMRS, this solution will enable corrections to be undertaken quickly and accurately thereby reducing impacts on Consumers' ability to switch suppliers.

13.3 COST BENEFIT ANALYSIS

There are no direct costs to the REC for this change. The cost to industry to implement this Change Proposal is spread across all ERDAs. They are all supportive of implementing the change and that the benefits outweigh the cost to implement.

14 CASE FOR CHANGE

SELF GOVERNANCE

The Code Manager considers there is a positive case for implementing this Change Proposal on the basis that the proposed solution:

- Appropriately resolves the original Problem Statement
- The cost and effort of implementing and operating the proposed solution is proportionate and cost-effective
- If the Change Proposal is not implemented, it would cause detriment to Market Participants and Consumers and their ability to Switch.

15 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 30 September 2025 to obtain views on the Change Report (For Consultation). In total five responses were received from four DNOs and the MPRS Provider. The key themes from these responses have been summarised and set out below. The non-confidential responses have been published here.

15.1 SUMMARY OF RESPONSES

Responses were supportive of the change and that it should be implemented, with explanations provided on why there were mismatches that need to be resolved using the tool.

15.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

All respondents agreed with the proposed solution.

15.3 BENEFITS RELATIVE TO IMPLEMENTATION AND OPERATIONAL COSTS

Two of the five respondents agreed with the Code Manager's assessment of the costs and benefits, the other three marked them as not applicable.

15.4 IMPLEMENTATION DATE AND APPROACH

The MPRS Provider agreed that this Change could be implemented for the proposed implementation date providing that no other changes are to be developed at the same time, and that this be given consideration in the prioritisation of future Change Proposals and Issues.

16 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No amendments have been made following consultation.

17 APPENDIX

CHANGE PROPOSAL	Link
SOLUTION DEVELOPMENT REPORT	Link
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
CONSOLIDATED CONSULTATION RESPONSES	Link
RECCO OVERVIEW SLIDES	Link
LEGAL TEXT	Link

18 GLOSSARY

TERM	DEFINITION
Central Switching Service	means the Systems and processes provided or procured by the CSS Provider for the purpose of providing the Address Management Service and the Registration Service.
Data Aggregator	means the person Appointed by an Electricity Supplier to aggregate consumption data for an RMP as further described in the Balancing and Settlement Code.
Electricity Retail Data Service	means the electricity registration services provided under this Code to support the provision of electricity retail data to the CSS and other services.
Metering Point Registration System	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 Interpretations and Definitions 59 Copyright 2024 Retail Energy Code Company Supplier Meter Registration Service in accordance with the BSC.
Registration Data	means the data recorded in relation to a Registration.
Secured Active	means the Registration Status as described in Paragraph 1.4 of the Registration Services Schedule