RETAIL ENERGY CODE

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

CHANGE REPORT

R0190 RELATED METER POINT RMP STATUS RULES

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	27 February 2026
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Change Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	Medium	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Energy Suppliers, MPRS		

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

The drafting in Schedule 28 – Related Metering Points has been updated for Market-wide Half Hourly Settlement (MHHS), allowing related Metering Points to be in a Status of Operational or Created in the Metering Point Registration System (MPRS), as long as all Related Metering Points are in the same Status. This Change Proposal suggests allowing Secondary Metering Points with a Status of Created to be linked to Primary Metering Points with a Status of Operational, for MHHS migrated Metering Points only.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the REC Change Panel:

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

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BACKGROUND

1 SUMMARY

The MHHS drafting within Schedule 28 – Related Metering Points has updated paragraph 5.1, allowing related Metering Points to be in a Status of Operational or Created as long as all Related Metering Points are in the same Status. This is planned to go live on 22 September 2025, as part of the MHHS Milestone 8 code release.

It has been raised by St Clements in their role as a Service Provider of the Metering Point Registration Service (MPRS) that for Metering Points that have migrated into the MHHS arrangements, Primary Metering Points with a Status of Operational should be able to be linked to Secondary Metering Points with a Status of Created. This is because once the relationship is established, the relevant agents will be automatically appointed on the Secondary Metering Point to match the Primary Metering Point, moving the RMP Status from Created to Operational.

As part of this Change Proposal, the Code Manager would like feedback from industry Parties (particularly Energy Suppliers) on how likely they would be to use this scenario if it was introduced into the REC.

Part of the scope of this Change Proposal when it was first raised was also to look at the existing MPRS validation rules when creating Related Metering Points, as it was suggested there may be a discrepancy between the Code and these validation rules. The Code Manager has descoped this from this Change Proposal as when it was raised, there were 20 identified Related Metering Point pairs which did not conform to the Code. This has since dropped to 0, and data held by the Code Manager confirms that (discounting for data cleanse activities), less than 100 new Related Metering Points have been set up in the past two years.

These small volumes suggest that even if the technical validation within MPRS does not match that of the Code, Energy Suppliers are still being compliant with their obligations and this does not justify a change to the MPRS technical validation.

2 PROBLEM STATEMENT

By not allowing Primary Metering Points with a Status of Operational to be linked to Secondary Metering Points with a Status of Created, where the Metering Points have migrated into the MHHS arrangements, full advantage is not being taken of the MHHS functionality of automatically appointing agents to Secondary Metering Points.

3 IMPACTS

CONSUMERS
Indirect impact

REC SERVICE PROVIDERS
Metering Point Registration System (MPRS)

REC PARTIES AND SERVICE USERS
Energy Suppliers

REC DOCUMENTS / PRODUCTS
Schedule 28 – Related Metering Points

MHHS
This Change Proposal directly impacts on the MHHS drafting for Schedule 28 - Related Metering Points.

4 CROSS-CODE IMPACTS

This Change Proposal has been highlighted at the Cross-Code Steering Group (CCSG) to ensure there are no consequential impacts to the Balancing and Settlement Code (BSC).

No cross-code impacts have been identified.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**14 Jul 25**	**13 Nov 25**
	Solution Analysis	July	August
	Solution Development	August	October
	Party Impact Assessment	September	October
	Business Case Assessment	October	November
Change Proposal		**14 Nov 25**	**19 Jan 26**
	Consultation	November	December
	Final Determination	December	January
Voting		**20 Jan 26**	**20 Jan 26**
	Appeal Window	21 Jan 26	04 Feb 26

6 STAKEHOLDER ENGAGEMENT

The solution development stage of this Change Proposal included presentation at the Change Issues Group and the issuing of an Information Request.

This assisted the Code Manager in determining whether allowing Secondary Created Metering Points to be linked to Primary Operational Metering Points is something Energy Suppliers would use in their operational processes. There was also a question around how prevalent Related Metering Points will be as the Smart Meter rollout continues.

6.1 INFORMAMTION REQUEST

An Information Request was conducted from 31 July 2025 to 22 August 2025. Three responses were received to the Information Request from one Energy Supplier and two Distribution Network Operators (DNOs). The non-confidential responses have been published here.

The responses allowed the Code Manager to conclude that while it is not foreseen that large numbers of Related Metering Points will be set up in future, the change proposed by this Change Proposal is something that would be useful for Energy Suppliers to be able to do. As no technical changes are required to MPRS to allow this Change Proposal to be implemented, the Code Manager and RECCo made the decision to continue progressing this Change Proposal.

7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	1	27	27
	Retail Markets Impact	Innovation and Market Arrangements	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		3	9	28
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	0	10	0
				Overall Priority Score (rounded)	129

Priority Status	MEDIUM
Change Proposal Type	STANDARD

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SOLUTION

8 PROPOSED SOLUTION

The proposed solution for this Change Proposal is to make amendments to Schedule 28 – Related Metering Points section 2.3 (a). The proposed changes are:

2.3 The prerequisites for this procedure are that:

> *(a) the Metering Points which are to become Related Metering Points must each have the same RMP Status of Operational or Created (unless the Metering Points are MHHS Metering Points, in which case the Metering Point which is to become the Primary Related Metering Point may have an RMP Status of Operational and the Metering Point which is to become the Secondary Related Metering Point may have an RMP Status of Created);*

This change means, for MHHS Metering Points, that once the relationship is established, the relevant agents will be automatically appointed on the Secondary Metering Point to match the Primary Metering Point, moving the RMP Status from Created to Operational. This reduces the number of steps in the process Energy Suppliers must carry out on the Secondary Metering Point.

9 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0190 can be found here.

No changes have been made from consultation.

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PRELIMINARY ASSESSMENT

10 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

10.1 SERVICE PROVIDER IMPACT ASSESSMENTS

No Service Provider impact assessment was required as part of this Change Proposal.

10.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was conducted from 19 September 2025 to 10 October 2025. In total two responses were received from one Energy Supplier and one DNO. The non-confidential responses have been published here.

ENERGY SUPPLIERS	• The Energy Supplier was supportive of the proposed solution and had no comments on the legal text as drafted. They agreed the proposed solution addresses the problem statement. • The Energy Supplier agreed all processes and scenarios that may be impacted by this Change Proposal had been considered. They did not foresee any impacts in the way they are required to manage Related Metering Points that had not been identified by the Code Manager, or any risks to their MHHS qualification or migration plans. • The Energy Supplier confirmed they supported a February 2026 implementation date. • The Energy Supplier confirmed they expected the implementation of this Change Proposal to cost less than £10,000. • The Energy Supplier did not identify any specific benefits at this time, but confirmed they believed this Change Proposal should be implemented.
DISTRIBUTION NETWORK OPERATORS	• The DNO confirmed they did not foresee a material impact in relation to Distribution Use of System Charge (DUoS) billing from the implementation of this Change Proposal. They added the confirmation from the Central Switching Service (CSS) and MPRS Service Providers there was no impact to their systems alleviated any concerns they may have had. • The DNO agreed the proposed solution addresses the problem statement. • The DNO raised they were unclear how exceptions would be managed if a Secondary Metering Point fails to transition from Created to Operational due to agent appointment issues. The Code Manager has confirmed this would be managed in the same way it is managed now for any Metering Point that fails to move from Created to Operational for this reason. • The DNO has no comments on the proposed legal text and did not raise any impacts on the way they are required to manage

	Related Metering Points that had not been identified by the Code Manager. • The DNO provided no comments on a required lead time, and confirmed they expected the implementation of this Change Proposal to cost them £0. • The DNO confirmed they saw better visibility and traceability, and increased operational efficiency as potential benefits from the implementation of this Change Proposal.

11 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

11.1 RISKS AND ISSUES

NO.	RISK	NOTES	MITIGATION
R01.I0190	Allowing Metering Points that are Operational and Created to become Related may have consequential impacts to the CSS.	The CSS Provider confirmed there was no impact from the implementation of R0190 on 29 August 2025.	A request will be issued to the CSS Provider for confirmation of any consequential impacts, and actions required to be taken if any impacts are identified.

There are no issues identified with this Change Proposal.

11.2 ASSUMPTIONS AND DEPENDENCIES

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A01.I0190	There are no impacts to MPRS or the MPRS validation rules from the implementation of this Change Proposal.	St Clements, in their role as the MPRS Service Provider, confirmed there was no impact from the implementation of R0190 on 11 September 2025.	Validated.

There are no dependencies identified with this Change Proposal.

12 BUSINESS CASE ASSESSMENT

12.1 COSTS

There are no central systems costs associated with the implementation of this Change Proposal.

The two respondents at Party impact assessment confirmed they saw their costs as being £0 or less than £10,000.

12.2 BENEFITS

TANGIBLE BENEFITS	BENEFITS DESCRIPTION
OPERATIONAL EFFICIENCIES	The implementation of this Change Proposal would mean, for MHHS Metering Points, that once the relationship is established, the relevant agents will be automatically appointed on the Secondary Metering Point to match the Primary Metering Point, moving the RMP Status from Created to Operational. This reduces the number of steps in the process Energy Suppliers must carry out on the Secondary Metering Point, as currently the agents must be appointed to both Metering Points to move them to a status of Operational and then the relationship created.

12.3 COST BENEFIT ANALYSIS

As there are no central system costs, minimal Party costs and one tangible benefit associated with this Change Proposal, the Code Manager believes there is a positive case for change.

13 CASE FOR CHANGE

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

- Is both viable and implementable, and effectively resolves the problem statement;
- Has no associated central system costs and minimal associated Party costs;
- Has proportionate effort required for implementation; and
- Provides operational efficiencies for the creation of Metering Point relationships for MHHS Metering Point.

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14 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 21 November 2025 to obtain views on the Change Report (For Consultation). In total two responses were received from DNOs. The key themes from these responses have been summarised and set out below. The non-confidential responses have been published here.

14.1 SUMMARY OF RESPONSES

Both respondents were supportive of the Change Proposal and believed it should be implemented.

14.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

Both respondents agreed with the proposed solution and provided no comments on the proposed legal text to support the solution.

14.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

Both respondents agreed with the Code Manager's assessment of the costs and benefits for this Change Proposal. Both respondents agreed with the Code Manager's recommendation that this Change Proposal should be approved and should be subject to self-governance voting at the REC Change Panel.

14.4 IMPLEMENTATION DATE AND APPROACH

Both respondents agreed with the Code Manager's recommendation of a Big Bang implementation and with the proposed implementation date of 27 February 2026.

15 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No amendments have been made following consultation.

16 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Link
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
CONSOLIDATED CONSULTATION RESPONSES	Link
ANY OTHER DOCUMENTS	Consolidated Information Request Responses

17 GLOSSARY

TERM	DEFINITION
Created	means the RMP Status indicating that an RMP has been created but is not yet Operational.
Distribution Use of System Charge (DUoS)	means a DNO's distribution use of system charges as defined within DCUSA.
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.
Operational	means the RMP Status indicating: (a) for gas RMPs, that the RMP is capable of offtaking gas (and not, for the avoidance of doubt, Isolated or no longer capable of offtaking gas); or (b) for electricity RMPs, that the RMP has been energised and has not been disconnected.
Primary Related Metering Point	means a Metering Point with which other Metering Points (the Secondary Related Metering Points) are related. This concept relates only to electricity and is described further in the Related Metering Points Schedule.
Registrable Measurement Point (RMP)	means a Supply Meter Point or Metering Point identified in the Central Switching Service.
Related Metering Point	means two or more related Metering Points as further described in the Related Metering Points Schedule.
RMP Status	means the status of an RMP, which can be Created, Operational, Dormant or Terminated.

Secondary Related Metering Point	means a Related Metering Point which is not the Primary Related Metering Point. This concept relates only to electricity and is described further in the Related Metering Points Schedule.