RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	Final Recommendation

CHANGE REPORT

I0282 – RETURN OF LEGACY METERS

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	TBD
IMPLEMENTATION APPROACH	TBD

RESPONSIBLE COMMITTEE	METERING EXPERT PANEL	CHANGE PATH	SELF-GOVERNANCE
PRIORITY STATUS	LOW	URGENCY	STANDARD
IMPACTED STAKEHOLDERS	Distribution Network Operators (DNOs), Energy Suppliers, Meter Asset Providers (MAPs), Metering Equipment Manager (MEMs)		

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OVERVIEW

Returning legacy non-Smart Meters is costly, inefficient, and creates unnecessary environmental impact, especially since ownership is often hard to confirm and the meters are not reused. The Issue explores a suggestion to allow these meters to be responsibly disposed of, potentially by waste management companies, and deciding how any scrap value should be managed.

RETAIL ENERGY CODE

CONTENTS

1 Summary 3
2 Problem Statement 3
3 Impacts 4
4 Cross-Code Impacts 4
5 Proposal Plan 5
6 Stakeholder Engagement 5
7 Priority Status and Urgency 6
8 Appendix 6
9 Glossary 6

RETAIL ENERGY CODE

BACKGROUND

1 SUMMARY

The issue identified is that current arrangements require or assume that legacy Meter Asset Providers (MAPs) take back old, non-Smart Meters once they are removed from Consumers' Premises, even though many of these meters are obsolete, cannot be reused, and ultimately require disposal. This has resulted in large volumes of legacy meters being transported across the country between storage providers and legacy MAPs, creating unnecessary cost, administrative burden, and environmental impact. Storage providers are issuing extensive lists of Meter Serial Numbers (MSN) to try to establish meter ownership, and legacy MAPs must manually verify these details. This process has been made more difficult by historical changes in company names and ownership structures. Once ownership is confirmed, the meters are frequently transported to the legacy MAP only for them to arrange disposal, which provides no net value and simply adds further transportation and handling costs.

This Issue has been identified through feedback from legacy MAPs and storage providers, operational analysis, and observations of the growing number of non-Smart Meters being removed as part of the Smart Meter rollout. It has also been noted that there is little to no recycling or refurbishment of these legacy meters for reuse, meaning the current expectation for MAPs to take possession of them is no longer aligned with the practical lifecycle of these assets. The absence of a standardised disposal route and the lack of clarity around the treatment of any scrap or residual value further highlight shortcomings in the existing arrangements.

The Proposer has suggested that a Code change may help to reduce avoidable costs, minimise environmental impact, and streamline operational processes. Transporting obsolete meters around the country purely to confirm ownership and then dispose of them is inefficient and environmentally unsustainable. A more appropriate approach could be for an accredited waste management company to collect legacy electricity and gas meters directly, disposing of them in an environmentally responsible manner without requiring their return to the originating MAP contrary to the process in place for current MAPs. This would simplify logistics, decrease administrative effort, and ensure compliance with environmental standards. In doing so, this Issue could further establish clear rules regarding how any residual scrap value is treated, whether it is used by the storage provider to offset disposal costs or returned to the legacy MAP.

The Issue is therefore exploring whether to introduce a code-approved option allowing legacy, non-reusable meters to be disposed of directly through an accredited waste management service rather than being transported back to MAPs. This reflects the realities of modern metering, reduces unnecessary environmental and financial costs, and should provide further clarity where the current Code drafting does not. Engagement with trade associations will help assess industry views of the scale of the Issue and possible solutions.

2 PROBLEM STATEMENT

The process for handling removed legacy non-Smart Meters is inefficient and environmentally costly, with unclear ownership, unnecessary transport, and no established recycling route. A

consistent, sustainable disposal solution is needed to reduce waste, simplify operations, and clarify the management of any scrap value.

3 IMPACTS

CONSUMERS
Electricity
Gas

REC DOCUMENTS / PRODUCTS
Consolidated Metering Code of Practice (CoMCoP)

REC PARTIES AND SERVICE USERS
Distribution Network Operators (DNOs)
Energy Suppliers
Meter Asset Providers (MAPs)
Metering Equipment Managers (MEMs)

MHHS
There are no expected impacts to MHHS at this stage. The Code Manager will continue to engage with the REC MHHS Programme to assess the Issue and any impacts that may arise as this Issue progresses.

Consumers: The proposer has noted that whilst they do not expect Consumers to be directly impacted by this Issue, the recycling of legacy meters will have an environmental benefit that will be seen by Consumers as part of the wider transition to Net Zero.

Consolidated Metering Code of Practice (CoMCoP): Clause 11.2.9 of the CoMCoP states that 'Metering Equipment must be returned to the Meter Asset Provider (unless subject to alternative commercial arrangements)'. The Proposer has identified that the use of the phrase 'commercial arrangements' may cover disposal, however there could be various bilateral agreements in place, and this could result in an impact where the process becomes burdensome for the Parties involved.

4 CROSS-CODE IMPACTS

No cross-code impacts have been identified by the Code Manager at this stage.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**01 Oct-25**	**13 May-26**
	Solution Analysis	October	March
	Engagement with Trade Associations	October	March
	Change Issues Group Engagement	December	April
	Solution Development	April	April
	Update to the Responsible Committee	May	May

6 STAKEHOLDER ENGAGEMENT

The Code Manager is planning to engage with the Change Issues Group as and when appropriate to gather feedback on this Issue and reflect on possible solutions that could be implemented.

The Code Manager is also planning to engage with a number of trade associations such as the Association of Meter Operators (AMO), the Community of Meter Asset Providers (CMAP), the Energy Networks Association (ENA) and the Independent Networks Association (INA) to understand which Parties are experiencing problems with the return of legacy meters, understand the different processes MAPs, MEMs and DNOs have currently in place, discuss any issues they may have with storage providers, and consider any other issues that could arise in this process. Depending on the evolution of the solution, other trade associations should be engaged with such as the Prepayment Meter Forum (PPMF).

The Code Manager has so far engaged with CMAP who believes that this Issue does not affect current MAPs as there is an industry process in place and an obligation for meters to be returned to the asset owner. The process described in CoMCoP and facilitated by the UKMF Meter Returns Document means that current MAPs are not being contacted by storage providers to identify their assets. The issue could originate from storage providers not receiving the relevant details regarding the assets or not accessing this information themselves when it comes to legacy MAPs.

The Code Manager took this update to the December CHIG and enquired whether members believed that the Issue could come from the lack of data access for storage providers. A DNO representative noted that the CoMCoP process could be outdated and an AMO representative highlighted that MEMs are currently questioning the cost-benefit of returning versus disposing of meters.

The Code Manager is therefore continuing to engage with industry stakeholders to consider all possible impacts this issue may have industry wide.

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	0	17	0
	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		1	9	9
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	Contribution to/ Alignment with RECCo's Forward Work Plan		1		8
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	1	10	10
				Overall Priority Score (rounded)	96

Priority Status	LOW
Change Proposal Type	STANDARD

This Issue has been assigned a priority status of low, based upon a weighted prioritisation score of 96.

8 APPENDIX

CHANGE PROPOSAL	Link
ANY OTHER DOCUMENTS	UKMF Meter Returns Document RECCHIG_25_1204 Draft minutes

9 GLOSSARY

TERM	DEFINITION
Consolidated Metering Code of Practice (CoMCoP)	means the code of practice forming part of this Code against which Meter Asset Managers, Meter Operator Agents, Approved Meter Installers, Electricity Metering Operatives and AMR Service Providers are assessed pursuant to the Metering Accreditation Schedule.
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Energy Suppliers	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Meter Asset Provider (MAP)	means the person that makes the Metering Assets for an RMP available for use by the Registered Supplier and the Consumer. This might be the Consumer, the Registered Supplier or a Third Party. It will normally be the owner of the Metering Asset, and they will normally lease the

	Metering Asset to the Registered Supplier or the Consumer (in return for a rental payment)
Meter Serial Number (MSN)	means the serial number that identifies the meter at an RMP.
Metering Equipment Manager (MEM)	means, as applicable, either: (a) for electricity, a Meter Operator Agent (MOA); or (b) for gas, a Meter Asset Manager (MAM).
Premises	is to be interpreted in accordance with the Gas Act and the Electricity Act.
Prepayment Meter	has the meaning given in the Energy Supply Licences.
Smart Meter	means a meter which conforms (or is intended to conform) with the SMETS.