RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	Final Recommendation

CHANGE REPORT

I0325 – POST-MHHS FULL TRANSITION COMPLETE (M15) REC UPDATES

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

RESPONSIBLE COMMITTEE	CHANGE PANEL	**CHANGE PATH**	SELF-GOVERNANCE
PRIORITISATION CATEGORY	HIGH	**URGENCY**	STANDARD
IMPACTED STAKEHOLDERS	AMR Service Providers, Data Aggregators, Data Collectors, Data Services, Distribution Network Operators (DNOs), Electricity Enquiry Service (EES) Users, Energy Suppliers, Meter Asset Providers (MAPs), Metering Equipment Managers (MEMs), Switching Operator, Third Party Intermediaries (TPIs)		

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

This Issue seeks to remove any redundant legacy and transitional obligations within the REC regarding the operation of the Market-wide Half Hourly Settlement (MHHS) arrangements.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the REC Change Panel:

- **APPROVE** the Proposal Plan, including the Responsible Sub-Committee, Change Path, Priority Status, Urgency and timetable.

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BACKGROUND

1 SUMMARY

The Retail Energy Code (REC) was updated to add requirements that support the transition to, and enduring operation of the MHHS arrangements. This was done primarily through R0209 – Implementation of Market-wide Half Hourly Settlement (MHHS) Arrangements and R0241 – MHHS Incremental Changes for go live (please see below for a detailed list of REC Change Proposals that were made to deliver the intent of MHHS). As part of the MHHS transition, each impacted Metering Point will be migrated using processes defined in Codes, including the REC. Once this migration activity is complete, the legacy and transitional arrangements will become redundant and should be removed from the REC to support its efficient operation.

The following additional Change Proposals were made to deliver the intent of MHHS:

- R0003 – Market-wide Half-Hourly Settlement Implementation which introduced an obligation within the REC for the delivery and implementation of MHHS;
- R0044 – MHHS Programme Changes required to Central Switching Service and R0097 Consequential Change for CSS Smart Meter Data Retriever Appointments were implemented at MHHS M8 to introduce the governance for sharing Smart Meter Data Retriever appointment information via the Central Switching Service to the Smart Meter Data Service Provider;
- R0032 – New Registration data items and processes to support the transition to Market-wide Half Hourly Settlement (MHHS) and R0066 – Inclusion of SMRS Data Items in EES (BSC CP1568 Consequential Change) introduced amended and new MHHS data items into the industry as an enabler in advance of the wider MHHS Implementation;
- R0083 – Changes to Supply Number Format for MHHS was implemented at MHHS M8 to introduce an amended Supply Number format as a consequential change of the removal of some data items from the industry under the MHHS arrangements;
- R0093 – Uplift to CSS Maximum Demand Volumes during MHHS Migration Period was implemented to ensure that the Switching Operator is appropriately prepared for the increase in message volumes that will be created during the MHHS Migration Period.
- R0202 – Annual Review of the Performance Assurance Report Catalogue (2025-26) was implemented to progress changes to the Performance Assurance Reporting Catalogue (PARC) to support monitoring of Retail Risks under the transition period and enduring arrangements for MHHS;
- R0208 – Adding the DIP Rules to the Cross Code Steering Group Terms of Reference added the Data Integration Platform to the scope of the Cross Code Steering Group; and
- Changes to Category 3 documents were implemented through C3-0130, C3-0131, C3-0136, C3-0137, C3-0138, C3-0139 and C3-0089.

2 PROBLEM STATEMENT

Retention of redundant obligations within the REC would make it more complex to navigate for Market Participants and could cause confusion on the obligations that are in effect to support the efficient operation of the Great British Energy retail market.

It is also worth noting that until Ofgem formally closes the MHHS Significant Code Review (SCR), this REC Issue could potentially impact that SCR.

3 IMPACTS

CONSUMERS
All Electricity Consumers (indirect positive impact)

REC SERVICE PROVIDERS
Service Providers should not be impacted by the changes identified beyond these already identified for MHHS Implementation.
Impacts on the EES Service Provider will depend on the approach, to be determined under I0325, to be taken for implementing identified changes to EES.

RECCO / REC CODE MANAGER
None currently identified. This Issue will be used to validate whether any updates are required for operational process documentation.

REC PARTIES AND SERVICE USERS
AMR Service Providers
Data Aggregators
Data Collectors
Data Services
Distribution Network Operators (DNOs)
Electricity Enquiry Service (EES) Users
Energy Suppliers
Meter Asset Providers (MAPs)

REC DOCUMENTS / PRODUCTS
A full scope document showing the various REC documents and products that will be impacted has been drafted and is available here.

Metering Equipment Managers (MEMs)
Switching Operator
Third Party Intermediaries (TPIs)

MHHS
This Issue has been noted by the programme who will be seeking confidence that there are no impacts to MHHS Implementation, particularly in regard to the timing of the changes to be made. A risk has been raised in and by the programme against all codes that removal of redundant clauses needs to not happen whilst they are still being used.
Changes made under this Issue will only be made to processes no longer required. For example, MHHS Migration will be complete, therefore Schedule 34 will be removed.

4 CROSS-CODE IMPACTS

It is expected that the Balancing & Settlement Code (BSC) and the Distribution Code Use of System Agreement (DCUSA) will also look to identify what legacy, and transitional arrangements should be removed from their governed documents. Cross-code coordination may be required for consultation on, or implementation of parts of the solution to I0325 where there are dependencies between the Codes. This however does not impact the development of the REC solution itself.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**30 Apr-26**	**30 Oct-26**
	Solution Analysis	April	August
	Stakeholder Engagement	August	September
	Solution Development	August	October
	Legal Review	September	October

This Proposal Plan does not include a Party impact assessment because no impact or operational changes required by REC Parties are expected. REC Parties will be able to engage and submit views as part of the industry consultation that will be issued once the definition of this Issue has been finalised.

The current expectation is that the solution should be implemented only after the MHHS Programme Milestone M15 which is currently planned for 07 May 2027 as the transitional/legacy requirements will still be required to complete MHHS Migration. The solution could be implemented in any available release following the programme confirmation that M15

has been met, with a preference to minimise the gap between MHHS Migration completion and implementation.

6 STAKEHOLDER ENGAGEMENT

Throughout the development of this Issue, the Code Manager is planning to engage with the Change Issues Group to gather feedback. This will help to determine the most appropriate solution to this Issue given the MHHS Migration timescales.

The Code Manager is also planning to engage with the BSC, DCUSA and the DIP given the potential cross-code impacts of this Issue. This Issue will also be monitored by the MHHS programme.

7 PRIORITISATION CATEGORY AND URGENCY

7.1 PROPOSER REVIEW

This Issue was submitted prior to 29 May 2026, the implementation of the Ofgem Code Prioritisation Harmonisation. There was no requirement for the Proposer to provide their review of the Prioritisation Category and Urgency when this was Change Proposal was submitted.

7.2 CODE MANAGER REVIEW

The Code Manager is proposing this Issue be given an Urgency Status of Standard and a Prioritisation Category of High.

The Code Manager believes this Issue:

- Does not meet the Ofgem criteria for Urgency;
- Has a strong alignment to the Strategic Direction Statement (SDS) as it strongly supports an SDS priority 3, objective 13.3: Ensure successful rollout of Market-wide Half-Hourly Settlement;
- Has medium importance as it delivers useful but broadly comparable benefits to other Standard changes; and
- Has a medium complexity as the scope of the solution is broad and requires a certain amount of time to work through each element and REC governed product effectively and ensure adequate Cross-Code coordination.

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PRELIMINARY ASSESSMENT

8 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

No risks, issues and dependencies have been identified by the Code Manager at this stage.

8.1 ASSUMPTIONS

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A01.I0325	No changes to the REC will be made until legacy or transitional arrangements are no longer being used. The implementation approach will be proposed with that in mind.	N/A	To be validated in the consultation.

9 APPENDIX

CHANGE PROPOSAL	Link
RELATED CHANGES	R0209 – Implementation of Market-wide Half Hourly Settlement (MHHS) Arrangements R0241 – MHHS Incremental Changes for go live R0003 – Market-wide Half-Hourly Settlement Implementation R0044 – MHHS Programme Changes required to Central Switching Service R0097 Consequential Change for CSS Smart Meter Data Retriever Appointments R0093 – Uplift to CSS Maximum Demand Volumes during MHHS Migration Period R0032 – New Registration data items and processes to support the transition to Market-wide Half Hourly Settlement (MHHS) R0066 – Inclusion of SMRS Data Items in EES (BSC CP1568 Consequential Change) R0083 – Changes to Supply Number Format for MHHS R0202 – Annual Review of the Performance Assurance Report Catalogue (2025-26) R0208 – Adding the DIP Rules to the Cross Code Steering Group Terms of Reference
ANY OTHER DOCUMENTS	I0325 Scope list

10 GLOSSARY

TERM	DEFINITION
AMR Service Provider (ASP)	means a business or organisation that offers provision of consumption data from a utility meter collected through an AMR system to a number of parties including Consumers, Shippers, Energy Suppliers, Gas Transporters, DNOs, energy brokers and energy management companies. Such a business or organisation may choose to apply for

TERM	DEFINITION
	approval (and therefore may be approved) under the Consolidated Metering Code of Practice in accordance with the Metering Accreditation Schedule.
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.
Data Collector	means the person Appointed by an Electricity Supplier to collect and process meter readings for an RMP as further described in the Balancing and Settlement Code.
Data Service	means the Advanced Data Service, Smart Data Service or Unmetered Supplies Data Service.
Data Communication Company (DCC)	means the person holding the DCC Licence.
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Electricity Enquiry Service (EES) User	means a Party or Non-Party REC Service User which is entitled to use the EES under the Data Access Schedule.
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Market-wide Half Hourly Settlement (MHHS)	means market-wide half hourly settlement, which is being introduced pursuant to the BSC (see MHHS Implementation).
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).
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).
Significant Code Review (SCR)	means a review of one or more matters by the Authority which the Authority considers is: (a) related to this Code (whether on its own or together with other Energy Code(s)); and (b) likely to be of significance in relation to the Authority's principal objective and/or general duties (as set out in section 3A of the Electricity Act and section 4AA of the Gas Act),

TERM	DEFINITION
	statutory functions and/or relevant obligations arising under Law, and concerning which the Authority has issued a notice that the review will constitute a significant code review.
Switching Operator	means the DCC in performing the role of managing the co-ordination of the CSS Provider and the other Switching Data Service Providers, including the mechanisms for CSS Users to report incidents and access service management support, from the CSS Go-Live Date.
Third Party Intermediary (TPI)	means a broker or introducer acting between Consumers and Energy Suppliers, including Price Comparison Websites.