RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

GUIDANCE ON ELECTRICITY METERING POINTS (MHHS)

On 27 June 2024 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for the Guidance on Electricity Metering Points.

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	03/09/2024
RESPONSIBLE COMMITTEE	Metering Expert Panel
LEAD ANALYST	Harriet Truss

DATE CONSULTATION ISSUED	27/06/2024
RESPONSE DEADLINE	19/07/2024

Question 1:	Do you have any comments on the proposed red lined text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
EDF Energy (Energy Supplier)	The changes to the redlined text for MHHS seem appropriate, however as detailed in our response to Question 2, we don't agree that there should be a separate guidance document for MHHS metering points.	Noted – thank you
National Grid Electricity Distribution (Distribution Network Operator (DNO))	3.1 Principles – although not part of the "redlined text", "RMP" is an acronym for "Registerable Metering Points" not "Related Metering Points" and therefore "RMP" should be removed to avoid confusion.	This has also been identified by the Code Manager along with some other housekeeping requirements. The redlining for MHHS has been done in isolation for a clear distinction however the Code Manager intends to recommend to the Metering Expert Panel that all the changes are considered together so that the MHHS changes are applied to an updated baseline.
Scottish Power Energy Networks (DNO)	No comments	Noted – thank you
SSE Energy Supply Ltd (Energy Supplier)	No	Noted – thank you

Question 2:	**Do you agree with the approach to have a separate guidance document for MHHS metering points, rather than a single document to cover both migrated and non-migrated metering points?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
EDF Energy (Energy Supplier)	No, we do not agree. We would prefer to see a single document covering migrated and non-migrated metering points. Not only are a small number of relatively minor changes being made to the document, but the main subject matter covered by this document is not directly impacted by MHHS. The only changes being made are to references (i.e.to Advanced rather than Half Hourly) and to remove NHH UMS. Creating a separate document could create the impression that the changes arising from MHHS are more material than they actually are. We think it would be easier to have single document that accounts for MHHS, for example rather than replacing references to Half Hourly with Advanced, you could say Half Hourly Metering Point (or Advanced Metering Point under MHHS). Similarly, you could include a note that the information on NHH UMS is not relevant under MHHS. In our view that is a more efficient way of updating this document to make it fit for purpose for MHHS.	The Code Manager has considered this response and sees value in the reasoning provided for a single document. However, the proposal will remain as creating a separate document for MHHS migrated MPANs, following the majority of responses.
National Grid Electricity Distribution (Distribution Network Operator (DNO))	We agree with the approach to have a separate guidance document for MHHS metering points, however, if this is a new document referring	The Code Manager notes the suggestions in this response and agrees regarding appropriate referencing and version control.

	only to migrated meters, the change history should start from the new MHHS v0.1. It could then be made clearer within Section 2 Introduction, that two separate documents exist for Metering Operations, one for migrated and one for non-migrated metering points, i.e. Introduction This document relates to migrated metering points only – for non-migrated metering points please refer to Guidance on Electricity Metering Points	This will be incorporated into the final version provided to the Metering Expert Panel for approval.
Scottish Power Energy Networks (DNO)	We believe that there is benefit in having a separate document for the transition period until everything is aligned under the MHHS regime.	Noted – thank you
SSE Energy Supply Ltd (Energy Supplier)	Yes as we believe this will be clearer.	Noted – thank you