RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

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

CHANGE REPORT

R0198 – METER ASSET MANAGER (MAM) COMMUNICATIONS METHOD REGISTER

DOCUMENT VERSION	1.0
PROPOSED IMPLEMENTATION DATE	27 February 26
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Metering Expert Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	Low	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Metering Asset Managers, Gas Suppliers		

LEAD ANALYST (SOLUTION LEAD)	ASSURANCE LEAD	SUBJECT MATTER EXPERT
LYDIA BENTLEY	ANTON MODEN	GLENN SHEERN
Click to send an email	Click to send an email	Click to send an email

OVERVIEW

Studies conducted by the REC Performance Assurance team have concluded that gas market data fidelity may be improved by reducing the frequency of missed messages passed from Meter Asset Managers (MAMs) to the Central Data Service Provider (CDSP), via gas Suppliers & Shippers. This Issue seeks to explore mechanisms by which a record of the communication methods used by MAMs and gas Suppliers could support the data quality improvement objective.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the REC Metering Expert Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 28 February 2026.

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 5
8 Summary Of Analysis Undertaken 6
9 Proposed Solution 7
10 Draft Legal Text 8
11 Summary Of Impact Assessment Activity 8
12 Risks, Assumptions, Issues And Dependencies 9
13 Business Case Assessment 9
14 Case For Change 11
15 Summary Of Consultation Responses 11
16 Summary Of Amendments Made Following Consultation 13
17 Appendix 13
18 Glossary 14

BACKGROUND

1 SUMMARY

Metering Asset Managers (MAMs) are permitted within the REC to communicate Market Messages for up to three methods via: the Data Transfer Network (DTN), the Information Exchange (IX), or email. Whilst some Market Messages and scenarios mandate one method only, many scenarios (especially those found in Schedule 14 – Metering Operations) allow for a MAM to communicate via any of the three methods. Whilst this provides flexibility for MAMs to adapt to differing requirements across diverse business scenarios, it also presents challenges in assuring the quality of gas market data.

Following investigative work conducted by the REC Performance Assurance team, it has been suggested that having a spread of viable communication options may result in mismatches where Data Items are held differently by different REC Users. For example, if a MAM sends a Market Message to another MAM using a method that the receiving MAM does not use, it is likely that the message will be missed, and they will record the same Data Item for a given Metering Asset differently. Additionally, it was also determined that having a spread of viable methods makes gas market data gathering exercises harder to facilitate.

2 PROBLEM STATEMENT

MAMs communicate with each other, and with other Parties, using up to three possible methods as they send Market Messages in line with their obligations in the REC. It has been suggested that access to multiple communication methods might contribute to gas data quality issues. This Issue seeks to explore a solution to mitigate this.

3 IMPACTS

CONSUMERS
None

REC SERVICE PROVIDERS
None

REC PARTIES AND SERVICE USERS
MAMs
Gas Suppliers

REC DOCUMENTS / PRODUCTS
Schedule 14 – Metering Operations
REC Baseline Statement

MHHS DESIGN
N/A

MHHS DATA SPECIFICATION
N/A

MHHS CODE DRAFTING
N/A

Impact is limited to gas Suppliers and MAMs, who will be asked to complete, and then review on an as-needed basis, a Communications Method Register to capture how Market Messages are sent and received. The Code Manager does not expect there to be any impact on Service Providers, Consumers, or the MHHS programme.

There will be an impact on Schedule 14 – Metering Operations, where drafting changes will be needed to introduce the Communications Method Register. Additionally, the Code Manager expects that the register will constitute a new Category 3 document, so changes to the REC Baseline Statement may be needed.

4 CROSS CODE IMPACTS

None.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**17 Dec 24**	**16 May 25**
	Solution Development	December	March
	Legal Review	April	April
	Impact Assessment	April	May
	Solution Refinement	May	May
Change Proposal		**17 May 25**	**12 Aug 25**
	Business Case Assessment	May	May
	Consultation	June	July
	Solution Refinement	May	July
	Final Determination	July	August
Voting		**13 Aug 25**	**13 Aug 25**
	Appeal Window	August	August

6 STAKEHOLDER ENGAGEMENT

The Code Manager plans to work closely with MAMs to ensure that their views and operational requirements are represented and acknowledged during solution development. Additionally, the Code Manager plans to engage more widely with industry during the progression of this Issue, at forums including, but not limited to: Change Issues Group (CHIG), Association of Meter Operators (AMO), Gas Operational Metering Forum (G-OMF), and the REC Metering Expert Panel in an advisory role to the Code Manager.

7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	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	0	14	0
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		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	0	10	0
		Overall Priority Score (rounded)			100

Priority Score	Priority Status
171 and above	Critical
151 to 170	High
101 to 150	Medium
0 to 100	Low

Priority Status	LOW
Change Proposal Type	STANDARD

Urgent Change Proposals meet the Criteria for Urgency as set out by Ofgem

This Issue has a priority status of Low, based on a score of 100. This score has been calculated as follows:

- Complexity/Effort/Duration has been given a score of two, indicating moderate complexity. This is reflective of the complexity of the overarching objectives of the Issue

(i.e., supporting a long-term reduction in the number of permissible communication methods), balanced against the lesser relative complexity of an interim solution.

- Operational Effectiveness & Efficiency has been given a score of two, indicating moderate impact. This is because this Issue aims to explore interim solutions that should result in better execution of REC Processes pertinent to MAMs via a reduction in missed Market Messages.
- Retail Market Impact: Innovation & Market Arrangements has been given a score of two, indicating moderate impact. This is because this Issue aims to explore solution options that will improve how MAMs interact with each other and innovates how escalations regarding missed Market Messages may be approached.
- All other metrics have been given a score of zero or one, as appropriate.

SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

The Code Manager has worked with various industry stakeholder engagement forums, such as CHIG, AMO & G-OMF to develop a solution that meets the needs of industry. CHIG has been used as the primary workshop forum, with discussions on the proposed solution in the December 24 and February 25 meetings.

The Code Manager has invited discussion on different iterations of the proposed solution, specifically focussing on a “spectrum of complexity” for a Communications Method Register. The initial proposal was for a relatively small register, only containing Party name and communications method. Feedback from industry suggested that a more comprehensive register, which contains additional information such as primary and backup communication methods, and methods on a Market Message by Market Message basis, may be useful. As a result of these discussions, the Code Manager has proposed a solution that encompasses some of this additional complexity that industry have reported may be useful.

8.1 SOLUTION DESIGN PHILOSOPHY

The Code Manager has designed the solution in the expectation that the following goals are achieved:

Capture of data relating to Consumer-appointed MAMs:

The scope of the proposed solution includes a register for MAM togas Supplier communications. Whilst this was not initially in the scope of R0198, it was suggested during forum discussions that these communications should be captured within the proposed register. Whilst it is expected that most MAM to/from gas Supplier communications will be prescribed under contractual arrangements, it was pointed out that communications sent by Consumer-appointed MAMs to gas Suppliers would be valuable to catalogue in the register, due to a perceived likelihood for these to contribute to gas data quality issues in the context of the R0198 problem statement.

Capture of data in differential Market Messages obligations:

The Code Manager has designed the register in such a way as to allow for different communication methods for different Market Messages, i.e., IX for an ONJOB, DTN for an ONDET. Whilst the Code Manager has no expectations for how useful this may or may not be as a functionality of the register, it was reported during initial solution development conversations that this might be helpful.

Communications Method Register as a Category 3 document:

The Code Manager is proposing the Communications Method Register be introduced as a new Category 3 document, owned by the Code Manager. This means that changes can be introduced and consulted to ensure that the register evolves in a way that best meets the needs of industry.

9 PROPOSED SOLUTION

The Code Manager proposes to introduce two Communications Method Registers. These registers will capture the means by which a REC Party discharges their obligations within Schedule 14 to send Market Messages to other REC Parties. For actions and communications sent from one REC Party to another, Schedule 14 features interface tables that prescribe the "Means" by which these messages are sent. Relevant to this Issue, these Means can include IX, DTN, and Email.

The Communications Method Register will sample specific "Actions", as well as their associated "Interfaces". i.e., the required Market Message (e.g., ONJOB, ONUPD), and the recipient and the sender ("From" and "To"). In this way, certain obligated REC Party communication will be captured, with space provided below for REC Parties to indicate the "Means" that they would use to communicate in that scenario, i.e., IX, DTN, or email.

The Code Manager is proposing two registers: One for MAM to MAM communications, and one for MAM togas Supplier communications. gas Suppliers and MAMs will be able to record both their primary communication method, and their backup within the register. The Code Manager would expect that the Communications Method Registers will act as "living documents", and will be updated as required by users, in order to provide the greatest mutual value.

The Code Manager proposes that these registers are published on the REC portal, and made available to REC Parties, in order to support in the resolution of missed Market Messages.

9.1 CHANGES FOLLOWING IMPACT ASSESSMENT

Following Impact Assessment, the Code Manager has made the following changes to the solution:

Addition of "Escalation Contact" option to Communications Method Register:

Following feedback from a REC Party, the Communications Method Register has been updated with a flag to allow Parties to indicate that they are open to discussing relevant missed Market Messages using existing escalation contact channels. As the purpose of the Communications

Method register is to support Parties in the resolution of missed Market Messages, the Code Manager expects that this addition will support the functionality of the register.

10 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0198 can be found here.

The legal text is split into two parts:

1) Changes to Schedule 14 – Metering Operations to introduce the Code Manager's intention to provide and maintain a register where MAMs, AMIs and gas Suppliers may record their communication methods in respect of Market Messages within the schedule.

2) The Communications Method Register – A new Category 3 document, whose purpose is as described above.

PRELIMINARY ASSESSMENT

11 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

11.1 REC PARTY IMPACT ASSESSMENTS

The Code Manager published a Party Impact Assessment between 03 April 25 and 29 April 25. In total, three responses were received; two from gas Suppliers, and one confidential response from a Metering Equipment Manager. The two non-confidential responses from Parties are summarised below.

GAS SUPPLIERS	**Summary:** One respondent was in favour of the proposed solution, with caveats made regarding the ways in which the register will be engaged with. One respondent was broadly against the proposed solution but are in favour of changes made to the register following their feedback. **Views on Solution:** SSE: SSE did not support the proposed solution. In their view only a permanent reduction in the number of permissible communication methods would result in a reduction in missed Market Messages. They did state that having a register is a positive step forward but identified issues in the register being updated optionally. The Code Manager would counter this point, as the legal drafting does create an obligation to review and maintain the register. The Code Manager has responded to SSE directly and modified the proposed solution in order to approach a compromise. More details can be found in the solution section of this document. Scottish Power: Scottish Power were supportive of the proposed solution, but were supportive on the basis that certain considerations

	were made about how the register will be hosted. They identified that it would be useful for the register to be published in the proposed release in a complete a state as possible, having been circulated potentially as part of pre-release activities. The Code Manager agrees with this position and will explore this following a provisional approval of this Change. This is detailed further under the Assumptions section of this document. **Implementation Approach & Timeline:** Both respondents supported the implementation approach and timeline. **Impact:** Neither respondent identified any financial or operational impact on their organisations.

12 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

12.1 ASSUMPTIONS AND DEPENDENCIES

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
1	The Code Manager will resolve questions relating to how and where the register is maintained on the REC portal as part of standard release activities.	This assumption has been raised following feedback from a Party IA respondent who raised questions over how the register will be hosted on the portal, and the extent to which it may be "pre-completed" by Parties prior to official go-live.	To be validated during the pre-release lead time of this Change, between July 25 and February 26.
2	The costs of hosting the register on the portal will be so low as to be negligible.	The Code Manager expects that because the register is a spreadsheet that will be publicly available, or some other similar kind of downloadable data, that the costs of hosting it are so low as not to be within scope of a cost-benefit test for this Change.	To be validated following release of this Change.

13 BUSINESS CASE ASSESSMENT

13.1 COSTS

No costs have been identified to deliver the proposed solution; there are neither central system costs nor Party costs.

13.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
INDIRECT REDUCTION IN MISSED MARKET MESSAGES	The Code Manager expects that by having access to a register where communication method preferences are detailed, a REC Party who has not received an expected Market Message will be able to understand the reasons for this, and engage with the other Party to resolve the situation. The Code Manager expects that once this behaviour (as delivered by the functionality of the register) becomes established, this will result in a reduction in missed Market Messages as Parties begin to utilise the register.
IMPROVED MISSED MESSAGE RESOLUTION APPROACH	For the same reasons outlined above, the Code Manager expects that by having access to the register, it will become possible for a Party to determine, the reasons why a Market Message they have sent is missed. This in turn will result in a more streamlined approach where Parties may utilise escalation contacts and channels more efficiently as they will have more information on communication preferences.
IMPROVED PERFORMANCE ASSURANCE FUNCTIONALITY	Having access to market-wide communications method information will support better functioning of Performance Assurance activities as missed Market Messages can be better analysed to determine route causes.

13.3 COST BENEFIT ANALYSIS

The Code Manager considers that the cost benefit test for the proposed solution has been met. There are no costs associated with delivery of the proposed solution, either from Parties or from Central Systems. Additionally, the Code Manager expects at this stage that the hosting of the register itself is likely to be so inexpensive as to be negligible (please refer to Assumptions section of this document for further information).

Furthermore, the Code Manager has identified a number of intangible benefits and has been told by a respondent to the Party Impact Assessment that they expect that the register will support in the reduction and resolution of missed Market Messages. Whilst one Party did question the benefit of the proposed solution, on balance, the Code Manager considers that due to this Change having essentially nil costs to implement, the amount of benefit required to make the proposed solution outweighs the negatives.

As a result, the Code Manager considers that a cost benefit test is still met, as the proposed solution should deliver a benefit that is proportionate to a nil cost of delivery.

RETAIL ENERGY CODE

14 CASE FOR CHANGE

SELF GOVERNANCE

The Code Manager considers that there is a case for change to implement this solution, on the basis that it:

- Is both viable and implementable, and it appropriately resolves the problem statement; and
- Is cost effective and proportionate to the anticipated benefit.

15 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 12 June 2025 to obtain views on the Preliminary Change report. In total four responses were received from three gas Suppliers (one of whom responded anonymously) and one Metering Equipment Manager. The key themes from these responses have been summarised and set out below.

15.1 SUMMARY OF RESPONSES

Of the four responses, three were supportive of the proposed solution and the implementation of the Change Proposal. The other respondent agreed in principle with the proposed solution, but argued that it did not resolve the problem statement in its current status.

15.1.1 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

Comments on "Core Solution"

Three of the respondents supported the proposed solution and agreed that the legal text delivered the intent of the solution. The other respondent did not support the proposed solution due, but did concede that the legal drafting delivers its intent. This respondent did not feel that the proposed solution would resolve the issues identified in the problem statement at an operational level. They felt that the proposed solution was insufficient in two areas:

1. Allowing respondents to indicate that they would differentially receive one Market Message via DTN, and another Market Message via IX, for example, would create an undue operational burden on market participants.

   Code Manager Response – It is not the Code Manager's expectation that Parties would use the Communication's Method Register as a pre-emptive tool to determine how to send specific Market Messages to specific Parties. Rather, it would be expected that Parties would use the Register as a tool to determine on an ad-hoc basis why responses haven't been received to missed Market Messages. This may then be useful as a tool to resolve escalations.

2. The proposed solution does not address scenarios where "Suppliers fail to process and pass on ONJOB flows to Suppliers".

Code Manager Response – The Code Manager agrees that this is unlikely to be resolved as a direct result of the R0198 proposed solution. However, the Code Manager feels that this could be addressed as part of the solution for I0196, which is currently in a solution development cycle at the time of publication, and has encouraged the respondent to raise this feedback as part of the exploration of that Issue.

At the time of publication of this report, the Code Manager is still in active dialogue with this consultation respondent.

Comments on proposed "Expanded Solution"

The Code Manager consulted on changes to the proposed solution in response to feedback garnered during the Party Impact Assessment. The Code Manager asked for views on two proposed changes to the solution:

1. Removing the functionality whereby REC Parties can differentially record preferences for one communication method against one Market Message and a different communication method against a different Market Message.
2. Enhancing the obligation in the proposed changes to Schedule 14 – Metering Operations to bind REC Parties to only use the indicated Communication Method as recorded in the Register.

Against the first proposed change, two respondents were in favour of removing this functionality, and two respondents were in favour of retaining it. As the respondents were split, the Code Manager took the view that retaining the functionality would be the most appropriate approach. This decision was informed by favourable feedback for this functionality at the REC Change Issues Group in the absence of a majority one way or the other in the consultation.

Against the second proposed change, three respondents were against enhancing the obligation, and one respondent was in favour. As a result, the Code Manager has decided not to enhance the obligation in line with the majority of consultation feedback.

15.1.2 BENEFITS RELATIVE TO IMPLEMENTATION AND OPERATIONAL COSTS

Two of the respondents supported the Code Manager's assessment of the costs and benefits of the proposed solution. One of these respondents also used their response to indicate that any long-term push towards reducing the number of permissible communication methods from three to one would be likely to incur significant, however.

Of the other two respondents, one indicated that there would likely be operational costs associated with the completion of the register, but they were unable to quantify these. The other respond identified cost-benefit concerns related to the two proposed solution alternations as discussed in section 15.1.1 of this document. They identified that there is no quantifiable benefits case to support the inclusion of the differential Market Message reporting functionality, and that undue costs may arise from the inclusion of a strengthened obligation. The Code Manager did not respond to the feedback relating to the undue costs arising from a strengthened obligation as this proposal is not being progressed.

On the points relating to an unquantifiable benefit relating specifically to the differential Market Message functionality, the Code Manager reiterated points made in Section 13 of this

document. The Code Manager's view is that the cost-benefit threshold is easily achievable due to the low costs to deliver and action the register, and that even modest benefits can result in a positive case for change. Therefore, whilst the Code Manager acknowledges the point about there being an unsubstantiated benefit case for the inclusion of the variable market message functionality, the additional costs to deliver it versus a solution without this functionality are likely to be so low as to not seriously impact the overall cost benefit case.

15.1.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

Notwithstanding the feedback detailed in Sections 15.1.1 and 15.1.2 of this document relating to questions over the operational improvements delivered by the proposed solution and questions relating to the cost-benefit of additions to the solution, the respondents overall did indicate a support for the "core" solution, and it's associated cost-benefit case. As a result, there is a tacit support amongst the majority of the respondents for the case for change, and the Code Manager's recommendation as a result.

15.1.4 IMPLEMENTATION DATE AND APPROACH

All respondents supported the Code Manager's recommendation in respect of the implementation date and approach.

16 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No changes have been made following consultation.

17 APPENDIX

CHANGE PROPOSAL	Link
APRIL REC ISSUES GROUP: GAS MEM PRESENTATION	Link
PROPOSED SOLUTION	Link
CONSOLIDATED PARTY IMPACT ASSESSMENT RESPONSES	Link
CONSOLIDATED CONSULTATION RESPONSES	Link

RETAIL ENERGY CODE

18 GLOSSARY

TERM	DEFINITION
Central Data Service Provider	means the 'Central Data Service Provider' appointed by Gas Transporters pursuant to standard special condition A15 (Central Data Service Provider) of the Gas Transporter Licences
Communications Method Register	refers the document in which Metering Asset Managers and Gas Suppliers may record the means by which they send Market Messages as part of their obligations as described in Schedule 14 – Metering Operations.
DTN	has the meaning given to that expression in the Data Transfer Services Agreement
IX	defined by Xoserve as “Information Exchange (IX) allows our customers to securely transfer files across the gas industry through a virtual gateway.”
Market Message	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
Metering Asset Manager	means a Party which has Qualified in that role under the Qualification and Maintenance Schedule. Where used in respect of a particular Supply Meter Point, it means the MAM Appointed by a Gas Supplier in accordance with the Metering Operations Schedule. The MAM is accountable for the installation, replacement, repair and maintenance of gas Metering Equipment (either itself or by an AMI), and the MAM must also therefore be Accredited under the Metering Accreditation Schedule.