RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0198 - METERING ASSET MANAGER (MAM) COMMUNICATION METHOD REGISTER

On 12 June 2025 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0198.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	06 August 2025
RESPONSIBLE COMMITTEE	Metering Expert Panel
LEAD ANALYST	Lydia Bentley

DATE CONSULTATION ISSUED	12 June 2025
RESPONSE DEADLINE	04 July 2025

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous Gas Supplier	We do agree will complete the register as we believe that this will support the proposed solution.	Thank you.
BUUK Metering Equipment Manager	Whilst BUUK does not disagree with the creation of two new Communication Method Registers, at present it does not seem practical operationally. It would operationally, still not deliver quality gas market data. The key reasons for this are as follows: • Whilst adding governance to how we send messages is a good thing, it will create new niche pressures to apply specific communications, mandating that we send ONJOBs via email to one Supplier, Data Transfer Network (DTN) to another, Information Exchange (IX) to another – this is distinctly unpractical, creating a complex process to administer. • A key issue that this will not address, is when Suppliers fail to process and pass on ONJOB flows to Suppliers. There is lack of Service Level Agreements (SLAs) that are followed and readily enforced, leaving mismatches between systems. A suggested approach would be to standardise all MAM > MAM, and MAM > Supplier flows to be sent through IX.	Thank you for your feedback. The Code Manager will respond to each bullet point in turn: • It's not the Code Manager's expectation at that Parties would use the register as a pre-emptive tool to determine how to send specific messages to specific Parties. Rather, we'd expect Parties would use the register as a tool to determine why responses haven't been received to missed Market Messages, thus acting as a support during escalations. • The Code Manager acknowledges that this should be examined and a resolution identified. However, the Code Manager feels that this discussion might fit better within the

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		scope of I0196, and encourages BUUK to engage with discussions on that Issue. • Whilst the Code Manager has been asked to explore standardisation as a long-term goal, it is too large a move to consider within the scope of R0198. As such, R0198 may be considered a stepping stone towards this goal in the long term.
SSE Energy Supply Ltd Gas Supplier	SSE does not have an issue with the proposed solution. We would like to see the MAM portal / website added to the dropdown list of options.	Thank you.
SEFE Gas Supplier	We agree with the proposed solution and welcome the work undertaken to get to a solution that seeks to deliver proportionate benefit to the market.	Thank you.

Question 2:	Do you agree that the draft legal text delivers the intent of the solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous Gas Supplier	Yes the draft text does deliver the intent of the solution	Thank you.
BUUK Metering Equipment Manager	Yes, we agree that the draft legal text delivers the intent of the solution.	Thank you.
SSE Energy Supply Ltd Gas Supplier	SSE agrees with the draft legal text	Thank you.
SEFE Gas Supplier	We have not reviewed the legal text.	Thank you.

Question 3:	**The proposed solution permits for respondents to record their communication preferences differentially against separate Market Messages. This functionality was included following REC Party feedback. Do you support this functionality? If not, please explain why?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous Gas Supplier	We support the use of different methods as a temporary measure. Our preference is for one method which will match our current system use.	Thank you – The Code Manager has considered all feedback received during the consultation, and feedback from previous meetings of the REC Change Issues Group, and will retain this functionality as a result.
BUUK Metering Equipment Manager	The functionality to pick and choose your communication preferences in relation to separate Market Messages makes sense on paper. However, in action, it would be disjointed. Particularly given as parties do not need to abide by the chosen communication preferences selected by the party being communicated with. Looking at electricity briefly, they utilise the Secure Data Exchange Portal (SDEP), which enables data to be shared securely, and importantly with clarity. The SLAs are clearly set which helps provide this clarity. There would not be ambiguity that comes to Market Messages as this would be established in the SLAs, and communication preferences would be standardised, ensuring a reduction in missed Market Messages.	Whilst we accept this feedback, there has been enough feedback to the contrary to suggest that this functionality is valid and useful, and as a result, this functionality will be retained.
SSE Energy Supply Ltd Gas Supplier	As different market messages can require different communications methods, allowing respondents to record these separately is the ideal solution.	Thank you – The Code Manager has considered all feedback received during the consultation, and feedback from previous meetings of the REC Change Issues Group, and will retain this functionality as a result.

Question 3:	**The proposed solution permits for respondents to record their communication preferences differentially against separate Market Messages. This functionality was included following REC Party feedback. Do you support this functionality? If not, please explain why?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SEFE Gas Supplier	We **do not support this functionality** as the benefit of this additional complexity has not been clearly established. We particularly note the following: *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*	Whilst we accept this feedback, there has been enough feedback to the contrary to suggest that this functionality is valid and useful, and as a result, this functionality will be retained.

Question 4:	**The proposed changes to Schedule 14 – Metering Operations create an obligation for REC Parties to complete and update the communications method register. However, the drafting does not compel a REC Party to exclusively use the indicated communication method. Do you think that the legal drafting should be changed to compel usage of the indicated communication method? If so, please explain why?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous Gas Supplier	Yes we think that parties should be compelled to use the stated communications method.	Thank you – Whilst the Code Manager appreciated your position on this issue, the majority of consultation respondents opted to retain the current legal drafting and did not support a strengthened obligation, the drafting will not be changed.
BUUK Metering Equipment Manager	We would challenge whether the intent of the Change Proposal is delivered through the proposed solution, or if any change is happening at all. If REC Parties could continue to communicate Market Messages outside of the preferred methods of communications that have been identified, this does not imply any change in communication would happen. It raises the question on what this catalogue might end up looking like in reality? e.g. for one MAM, how many different combinations of mechanisms to send information there would be? If you worked out how many MAMs and Suppliers there were and the three different methods for sending information, how many different combinations of flows would this result in? Again, this highlights how a standardised approach which would compel the usage of the agreed communication approach would address issues of communication differences, without having to operate bespoke approaches for Market Messages to a multitude of parties.	The Code Manager expects hope is that the register supports the resolution of missed market messages – As the register will cost very little to deliver, the bar for a cost benefit test is low, so we'd consider that even a modest benefit and improvement in message resolution rates would justify the solution. However, we've not heard enough support from industry to justify moving to a compulsory model for the register, so we won't be including that functionality.

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RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply Ltd Gas Supplier	SSE agrees with the current legal drafting that allows flexibility for parties to agree different communications methods that meet their business needs. Therefore, we do not think that the legal drafting should be changed.	Thank you – As the majority of consultation respondents opted to retain the current legal drafting and did not support a strengthened obligation, the drafting will not be changed.
SEFE Gas Supplier	We **DO NOT** think that the legal drafting should be changed to compel usage of the indicated communication method. We have a consequential concern regarding the potential for "mandating" methods of communication that a stakeholder lists. If a method is listed, then our concern is that the party should be obligated to support in all cases. Some methods of communication may only be suitable/supportable for lower volumes of transactions e.g. email. Whilst other methods may be suitable/supportable for larger volumes of transactions e.g. DTN or IX.	Thank you – As the majority of consultation respondents opted to retain the current legal drafting and did not support a strengthened obligation, the drafting will not be changed.

Question 5:	Do you agree with the proposed implementation date and approach? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous Gas Supplier	We agree with the proposed implementation date	Thank you.
BUUK Metering Equipment Manager	We are in agreement with the proposed implementation date, and approach. However, we would suggest an introduction of greater standardisation of flow would be more preferable as a solution.	Whilst the Code Manager has been asked to explore standardisation as a long-term goal, it is too large a move to consider within the scope of R0198. As such, R0198 may be considered a stepping stone towards this goal in the long term.
SSE Energy Supply Ltd Gas Supplier	Yes.	Thank you.
SEFE Gas Supplier	Subject to our comments in 3 & 4 we have no concerns.	Thank you.

Question 6:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous Gas Supplier	We agree with the assessment of proposed interim solution cost. However we are concerned that moving to a single solution may have a high cost depending on the solution chosen.	Thank you – The Code Manager will review the costs of a move to a single permissible communication method for Market Messages at such a time as it is considered.
BUUK Metering Equipment Manager	IT and manual resource would be involved in setting up specific methods of communication for specific parties, with no guarantee of delivering better data quality. As referenced, the standardisation would simplify the forms of communication used for parties and would limit time and resource on having to use bespoke communications for a range of parties. For example, mandating that all ONJOBs, should be sent via IX. This would help simplify the data flow landscape.	The Code Manager has reached out to the respondent to request a quantification of the costs - this information had not yet been provided at the time of publication. In regards to the other points raised, please refer to the Code Manager's response to Question 1.
SSE Energy Supply Ltd Gas Supplier	SSE agrees with the assessment of the costs and benefits of this change.	Thank you.
SEFE Gas Supplier	We note that the **inclusion of the proposal in 3 has no evidence of a benefit** and therefore cannot be proven to be an efficient outcome. We note that **undue costs may arise subject 4 if inefficient methods of communication have to be supported** e.g. manual processing costs for large volumes of transactions sent via email.	On the point relating to Question 3, 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

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		deliver it versus a solution without this functionality are likely to be so low as to not seriously impact the overall cost benefit case. On the point relating to Question 4, as the Code Manager is not changing the legal drafting, these points are now redundant.

Question 7:	**Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the Metering Expert Panel?**	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous Gas Supplier	Yes the expert panel should make the approval	Thank you.
BUUK Metering Equipment Manager	Yes, we agree with the Code Manager's assessment. The Change Proposal should be Self-Governance and subject to approval by the REC Metering Expert Panel (RECMEP).	Thank you.
SSE Energy Supply Ltd Gas Supplier	SSE agrees that this change should be subject to self-governance approval.	Thank you.
SEFE Gas Supplier	Subject to 3 & 4 we agree	Thank you.

Question 8:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous Gas Supplier	[The respondent provided a completed copy of the Communications Method Register]	Thank you.
BUUK Metering Equipment Manager	How will REC monitor whether parties actually process flows, given there is no requirement for parties to use the preferred communications that have been shared?	The Code Manager will discuss this with its Performance Assurance function and confirm as part of the implementation.
SSE Energy Supply Ltd Gas Supplier	No.	Thank you.
SEFE Gas Supplier	We would like to put on record our thanks for the Code Managers engagement in the development of this proposed change.	Thank you.