RETAIL ENERGY CODE

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# I0282 – RETURN OF LEGACY METERS – ISSUE CLOSURE REPORT


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## 1 SUMMARY


The purpose of this paper is to provide information on I0282 – Return of Legacy Meters, including steps taken and progress made by the Code Manager. It also provides the reasoning for moving this REC Issue to a "Resolved" status.


## 2 BACKGROUND

REC Issue I0282 – Return of Legacy Meters was raised by SP Electricity North West who identified that current arrangements require 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 suggests that large volumes of legacy meters are 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. 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. With historical changes in company names and ownership structures, this process may be even more complicated.

This Issue aimed to explore whether this was an isolated case faced by the Proposer or shared by other Parties, and if that was an industry-wide Issue to explore a suggestion to allow legacy meters to be responsibly disposed of, potentially by waste management companies, and deciding how any scrap value should be managed.

## 3 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.

## 4 PROGRESSION OF I0282 TO DATE

The below Proposal Plan lays out the main steps and stages of I0282 that were undertaken by the Code Manager.

| 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 |

Solution analysis occurred between October 2025 and February 2026. This included engagement with several Trade Associations and engagement with the Change Issues Group (CHIG). The Code Manager presented this Issue to the Community of Meter Asset Providers (CMAP) in October 2025 where MAPs indicated that this was not an issue for them as there is a longstanding industry process in place and an obligation for meters to be returned to the asset owner. The industry process described in CoMCoP is facilitated by the UKMF Meter Returns Document and works well for MAPs. CMAP advised that the problem could originate from storage providers not receiving the relevant details regarding the assets or not accessing this information themselves. The Code Manager went to CHIG in December 2025 to update them on CMAP's view and to enquire whether they had more information on this potential Issue, including whether they believed that the Issue could come from the lack of data access for storage providers. CHIG members questioned the value of transporting redundant meters when recycling is the likely outcome and emphasised the importance of recycling and compliance with environmental regulations.

Although CHIG members could not confirm that this was an issue experienced by other Parties in the industry, the points they raised led to the Code Manager engaging with the Association of Meter Operators (AMO) to gather information of the return of legacy meters' process from a MEM's perspective, and two network associations, the Energy Network Association (ENA) and the Independent Network Association (INA), to hear from Distribution Network Operators' (DNOs) and understand whether they experience any issues with the current process, such as inefficiencies. The INA is not concerned with the return of legacy meters as they are not legacy MAPs and therefore do not own historical assets. The ENA mentioned their members are indeed being contacted by storage providers to identify their assets. However, they manage to ascertain quickly which meters they own, before asking the storage providers to directly ship their assets to their disposal plants. Updating the UKMF Meter Returns Document also helps with this procedure. ENA members therefore believe that the current procedure does not create unnecessary transport, nor is it environmentally costly as they have an established recycling route. They mentioned that having a clear recycling contract in place seemed to be what makes the difference, and that to be returned to a recycling facility, meters should have a hazardous waste notice on them. Although processes may vary from business to business – some might ask the Meter Operator to directly send their meters to a recycling plant once they have taken them off the wall for instance – no ENA member thought that this was currently an issue.

Engagement with Trade Associations ended in February 2026 and given their views that the current process does not require remediation it is considered that the REC Issue should be resolved prior to solution development taking place.

## 5 DECISION TO MOVE I0282 TO RESOLVED

A decision has been made by the Code Manager to move this REC Issue to Resolved as industry Parties did not believe it was an Issue. All Parties concerned follow the industry processes that are in place, believe it works well, and that it does not create unnecessary cost, administrative burden, nor environmental impact.