RETAIL ENERGY CODE

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PAB DEROGATION REPORT – FUSE ENERGY SUPPLY EXEMPTION FROM D0131 FLOW

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FOR DECISION 	This paper sets out a report to the Performance Assurance Board (PAB) on a Derogation Application received on 15 July 2025 from Fuse Energy Supply Limited. The Derogation relates to the obligation for Suppliers to send D0131 Flows with the Meter Point Address Details to its agents over the Data Transfer Network (DTN). This derogation is sought to cover the Party from exposure to the risk of non-compliance whilst it continues using their current solution as they develop and test the required changes to their internal systems process to be able to meet this obligation. The Code Manager requests the PAB to: • **APPROVE** the Derogation Application as set out below, including the timescales and recommended conditions.	

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1 BACKGROUND

REC Schedule 29 – Address Management, Section 6 – Updates to the Meter Point Location (MPL) Address (Electricity) details the Electricity Supplier's obligation to provide updates regarding a MPL Address to the relevant Supplier Agents.

Specifically, Suppliers are required to send D0131 – Metering Point Address Details Flows to inform agents of change to Metering Point Address details.

1.1 DEROGATION APPLICATION

Fuse Energy Supply Limited has applied for a Derogation from its obligation as a Supplier to submit D0131 Data Flows over the Data Transfer Network (DTN) to the appointed Supplier agents to notify of a change to the MPL, as detailed in REC Schedule 29.

Fuse Energy Supply works exclusively with its appointed Meter Operator Agent (MOA) Fuse Meter Operations Limited (FUSI), which is part of the same group of companies. All MPL address changes are captured in real time within Fuse Energy Supply's internal systems comprising a shared address database which is accessed by both Parties and returns the most recent accurate address data. Therefore, all updates are immediately visible to FUSI as the MOA. Fuse understands this offers the same level of visibility and data integrity as the D0131 schema, ensuring that, as the appointed Supplier agent, FUSI receives timely and accurate information.

Fuse Energy regularly monitors address integrity, making updates either at the customer's request or when discrepancies are identified between the Gas Enquiry Service (GES) and the Electricity Enquiry Service (EES). The frequency of these audits is driven by system alerts. This process would remain unchanged regardless of them sending the D0131 flow.

Fuse Energy Supply believes its current process represents a safe, efficient, and proportionate alternative. However, they are applying for a Derogation to continue using their current solution whilst they work to change this process in order to be able to meet the obligation and ensure there is an audit trail of this information exchange by sending the D0131 Flow over the DTN.

1.2 DEROGATION SUMMARY

The below information has been compiled by the Code Manager in relation to the Derogation Application:

	DEROGATION DETAILS
Summary of the issue	Fuse Energy Supply Limited requires a Derogation from their obligation to send D0131 Flows over the DTN, to enable them to continue using their current process to inform the MOA of MPL address updates. Derogation is required until the Party has changed their internal process. This will require engineering time for development and testing and has been added to their roadmap for delivery at some point within the timeframes provided below, depending on engineering capacity.
Summary of the proposed Derogation and impacted REC obligations	REC Schedule 29 – Address Management, Section 6.7 REC Schedule 29 – Address Management, Section 6.10.7 The scope of this Derogation is limited to updates sent to Fuse Energy Supply's appointed agent. It does not extend to

	consumer address updates in the EES, which the Supplier will continue to submit using the D0381 Flow.
Related Derogations or applications	N/A
Impacted REC Parties and Service Providers	Settlement Systems: No impact. Address data is reconciled and delivered on schedule. Customers: No impact. Switching and billing timelines stay unchanged. Meter Equipment Manager: No impact. The omission of D0131 flows has not had any impact on FUSI (Fuse Energy's sole Meter Equipment Manager) as accurate address data is accessible to metering engineers using internal systems.
Impacts on Retail Risks	This Derogation impacts Risk Driver 6.2 "Supplier does not notify Agents of the updated MPL Address of a Registered Meter Point Record in a timely manner which prevents access for meter works". Since January 2025, Fuse Energy Supply has had a Normalised Risk Driver Score of 1.00, indicating they have not communicated these updates to their Agents after the DNO has accepted their request to update the MPL Address. However, they have not breached the threshold for this Risk Driver due to the very low volume of processes each month. Between April 2024 and December 2024, their Normalised Risk Driver Score for this Risk Driver was 0.5, indicating they were sending these updates in 50% of the cases.
Legal advice obtained in relation to the application	N/A
Technical advice obtained in relation to the application	• There are no identified REC System impacts or Enquiry Service impacts. • There is no identified need for a technical impact assessment from any REC Service Providers. • There is no identified need for any system monitoring or reporting to help inform future REC Changes.
Length of the Derogation	A nine-month Derogation until end of Q2/June 2026, with an update to be provided to PAB in March 2026 to ensure Fuse Energy Supply's readiness for the end of the Derogation (i.e. to be able to send the Flow over the DTN)". This is based on plans shared by Fuse indicating the development and testing is expected to be complete by Q2 of 2026.
Conditions to any Derogation	N/A
Ofgem consent	N/A

2 RECOMMENDATIONS

Based on the information submitted by the applicant and the assessment undertaken by the Code Manager, the following recommendations have been made for the PAB's consideration.

- **APPROVE** the Derogation can be granted; and
- **APPROVE** the length of the Derogation**.**

3 PAB ACTIONS

PAB DECISION



The Code Manager recommends the PAB to **APPROVE** the Derogation Application as set out above, including the timescales and recommendations.