

NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0306 REC CHANGE TO ALIGN WITH DCP467 ASSET CONDITION REPORTING

On 15 May 2026 the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for [R0306 REC Change to Align with DCP467 Asset Condition Reporting](#).

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	11 June 2026
RESPONSIBLE COMMITTEE	Metering Expert Panel
LEAD ANALYST	Caroline Freimuller

DATE CONSULTATION ISSUED	15 May 2026
RESPONSE DEADLINE	08 June 2026

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	<p>We agree with the intent proposed solution,</p> <ol style="list-style-type: none"> 1) The update to the STIRG covers the online tool use if available and its intent as a primary option where available 2) The legal text for market message updates covers the proposed changes. <p>In terms of the general proposal</p> <p>It is quite clear and very difficult to disagree that the addition of pictures is a significant step forward in improving the customer journey.</p> <p>It has been trialled for the last 4 years and works very well with those that use it. Having a transitional arrangement with anti-duplication controls – has been seamless.</p> <p>For suppliers and MEMs it is by far the least cost solution (Generally minimal or no cost) - if we tried to develop photographs in the D0135 data flows cost for all parties would be significant.</p> <p>All of the IT change cost – with the exception possibly of a header page is with the DNO's and this is quite significant.</p>	<p>Thank you for your comments.</p> <p>The Code Manager is in agreement that photographs provide benefits, but believes for them to be mandatory there needs to be something codified, either within REC or DCUSA, as to what Data Items can be mandatory within online reporting tools. This would ensure consistency across DNOs, allow all Parties to raise changes against this list, and ensure all changes are discussed under appropriate governance forums. There did not appear to be appetite within the DCUSA Working Group to add this into the solution. This does not stop DNOs from having an optional photograph field within their online reporting tools.</p>

	<p>The consistency of the developing solutions so that they are effectively the same is covered by the data that is allowed to be collected similar to the D0135 flow and photographs.</p> <p>The cost of developing a solution with photographs however can have a business case to promote funding through the improved customer service and efficiency - but only if there is a commitment for DCUSA parties - Suppliers and SIPs to use the solution.</p> <p>After 4 years of pushing with multiple supporters - including the Large Suppliers and DES & NZ Suppliers have highlighted that to contractually require mems to provide this – it would need to be a requirement in DCUSA.</p> <p>This is in effect a transition away from the Data flow solution for photographs - but the data flows particularly the D0368 and the D0126 data flows would remain in place to provide the agreed feedback.</p> <p>There are three of the Electricity Network operators in different stages of reviewing this option</p> <p>The Solution provides an improved customer journey for each Suppliers customers, so I would request this is a prime consideration and we consider how this can work and agree any mitigation to make this successful.</p>	
<p>Scottish Power Energy Networks (Distribution Network Operator)</p>	<p>SPEN are not supportive of DCP467 and are of the view that there are clarifications yet to be confirmed in the DCUSA proposal, considering this we cannot agree with the REC R306 change proposal.</p>	<p>Thank you for your comments.</p>
<p>Northern Powergrid (Distribution Network Operator)</p>	<p>Yes. Where DNOs have invested in developing online tools for reporting A and B service termination issues, parties should make use of them. Mandating their use is therefore reasonable.</p>	<p>Thank you for your comments.</p>

Scottish and Southern Electricity Networks (Distribution Network Operator)	Yes. SSEN supports the proposed solution.	Thank you for your comments.
BUUK (Distribution Network Operator)	At present, we do not have online reporting tools and so we support the change that includes the current process where parties do not have the online reporting to use. Should this change for us in the future we will welcome the use of the online system.	Thank you for your comments.
British Gas (Energy Supplier)	No. This proposal at present will satisfy only one DNO as other parties do not have a URL App in place for category code reporting so field engineers would have to know which MPAN area they are mandated to report via the App and then ring in all other DNO areas. This could cause confusion; especially on DNO border areas. If other DNOs adopt use of an App for reporting it could be on a different platform to other DNOs which would mean the engineer having to access 6 different platforms for reporting. If the DNOs could agree a single platform or “front page” it would be far simpler to use and report. If this proposal is mandated and there is no access to a phone number to report, there may be technical or communications issues at site that prevents use of the App and therefore a delay in reporting.	Thank you for your comments.
E.On Next and Npower Business Solutions (Energy Supplier)	No, we disagree with the proposed solution. While we understand the desire for enhanced data gathering (such as photographs), the proposed solution prioritises DNO triage convenience at the expense of national field workforce safety, efficiency, and data integrity. For immediate, life-threatening danger, digital forms are inappropriate. Field technicians are required to stay on-site during a Category A event until a safe handover or arrival is confirmed. Relying on an online form	Thank you for your comments.

	<p>introduces a digital black hole—if an operative submits a form in a low-signal area, they risk being stranded for hours without the definitive, two-way verbal confirmation that a telephone call provides.</p> <p>Forcing field operatives to navigate separate, bespoke reporting processes (Portal vs. Market Message) based on geographic DNO boundaries is inherently inefficient. It introduces high risks of human error, where an operative fails to locate a URL, encounters technical downtime, or uses the wrong DNO portal.</p>	
SSE Energy Supply (Energy Supplier)	<p>Whilst we agree that the STIRG and market message should be updated to reflect DCP467, we have considerable concerns around the priority use of an online portal rather than a telephone to report what can be emergency faults. We are not against the option to use a DNO portal, but we feel this should not be mandated over the use of a phone.</p>	Thank you for your comments.
Smart Metering Systems (Data Collector)	<p>No,</p> <p>We would prefer to not work outside the industry flow process as this provides a traceable approach that is consistent for all parties.</p> <p>With a national workforce we need to have consistent training and procedures to match.</p>	<p>Thank you for your comments.</p> <p>The Code Manager will add the lack of traceability from a central source to the Change Report.</p>
Alt HAN Co (Other)	<p>Yes – assuming the associated DCUSA change is recommended for approval in alignment with the current DCUSA proposed legal text.</p>	Thank you for your comments.
Calisen Metering Services (Metering Equipment Manager)	<p>Calisen are partially supportive of the proposal, if the change is an ‘or’ i.e. the issue can be raised on an online portal or via existing processes (phone and flow). We are supportive of the need to provide more</p>	<p>Thank you for your comments.</p> <p>The solution as stands mandates the use of the online reporting tool if it has been provided by the DNO.</p>

	<p>information in order to help resolve onsite issues as soon as possible, reduce aborts and impacts to the consumer.</p> <p>For Calisen we would need to investigate implementing the functionality to allow the field devices to be allowable to access any portals – we would need to scope this out and there may be a cost/time associated.</p> <p>We would be more supportive of this change if there was going to be one portal introduced, not numerous. Having different portals, with different requirements, logons etc could cause confusion, impact time on site or delay raising incidents. We note this is being led by DCUSA. There also needs to be the back up option when servicing sites where there may be impacted network signal.</p>	<p>The Code Manager will feed back the point on network signal to DCUSA as the lead code.</p>
<p>Anonymous (Metering Equipment Manager, Crowded Meter Room MOA)</p>	<p>Yes, we support the proposed solution as it aligns directly with DCP 467, which we also support</p> <p>As noted in our DCP 467 response, we are supportive where this enables a consistent approach across the UK and ensures staff are trained to follow the same processes across all DNO areas. The REC change is necessary to ensure these requirements are applied consistently across all relevant roles, including the CMR space</p>	<p>Thank you for your comments.</p>

Question 2:	Do you agree with the proposed implementation approach (Big Bang)? If not, please explain why?	
RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	Yes - the implementation of the STIRG changes and market message changes can be updated in one hit and the implementation time frame would be aligned to any associated DCUSA change.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	While we are not supportive, we believe should this be implemented that a big bang approach would be appropriate.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.
Scottish and Southern Electricity Networks (Distribution Network Operator)	Yes, it would make sense to deploy all changes together if DCP467 is approved.	Thank you for your comments.
BUUK (Distribution Network Operator)	Yes, though this is not directly impacting us.	Thank you for your comments.
British Gas (Energy Supplier)	Yes. A single date implementation would be easier to cascade to the Field rather than a phased approach. This is dependent on how many DNOs are using an App at the time of implementation.	Thank you for your comments. For clarity, the Big Bang implementation would only mandate the use of an online

		reporting tool where a DNO has one, it would not mandate DNOs providing such a tool.
E.On Next and Npower Business Solutions (Energy Supplier)	<p>No, we do not agree.</p> <p>A "Big Bang" approach is unfeasible given the fragmented nature of the solution. Because individual DNOs are left to build or deploy their own unique portals on their own timelines, a single-date switchover creates operational risk.</p> <p>A Big Bang approach also assumes industry readiness that cannot be achieved under current conditions. Energy Suppliers cannot deploy a single software release to manage an unknown, unharmonised quantity of external web links without risk of operational failure on day one.</p>	<p>Thank you for your comments.</p> <p>For clarity, the Big Bang implementation would only mandate the use of an online reporting tool where a DNO has one, it would not mandate DNOs providing such a tool.</p> <p>The other option of a Phased Implementation is likely not applicable here, as it would require parts of the REC solution go live on different dates.</p> <p>The Code Manager does however note that in reality for Energy Suppliers and MOAs this is not really a Big Bang implementation, as it is not changing the way of working for all DNOs on the same day.</p>
SSE Energy Supply (Energy Supplier)	Yes, we agree with the implementation approach.	Thank you for your comments.
Smart Metering Systems (Data Collector)	<p>No,</p> <p>As above it would introduce different working methods for different MPAN areas. If all DNO's had the same portal then reporting would be consistent.</p>	<p>Thank you for your comments.</p> <p>The Code Manager will note this as a general response against approval, rather than a preference for a Phased implementation over a Big Bang implementation.</p>
Alt HAN Co (Other)	Yes.	Thank you for your comments.

<p>Calisen Metering Services (Metering Equipment Manager)</p>	<p>As per point 1 we would potentially need to change IT systems and solutions, which could take time. Therefore big bang is fine, if the solution is 'or' not 'must be' on an online portal.</p> <p>It should also be considered that if not all DNOs have a portal at the 'go-live' date, there may be a mixed approach at the start. We would also query, how then would we be notified of a change of process to then using a portal for a particular DNO?</p>	<p>Thank you for your comments.</p> <p>There is no obligation for a DNO to provide an online reporting tool, so the mixed may of working could continue with no end date.</p> <p>The Code Manager will feed back to DCUSA for clarity on how Parties will be notified if a DNO implements an online reporting tool.</p>
<p>Anonymous (Metering Equipment Manager, Crowded Meter Room MOA)</p>	<p>We are supportive in principle; however, the success of a Big Bang implementation will depend on the readiness and consistency of DNO online reporting tools</p> <p>As highlighted in our DCP 467 response, the introduction of mandatory online reporting will require additional briefings and training (e.g. toolbox talks), although we expect this to have minimal impact provided sufficient preparation time is allowed</p>	<p>Thank you for your comments.</p> <p>For clarity, the Big Bang implementation would only mandate the use of an online reporting tool where a DNO has one, it would not mandate DNOs providing such a tool.</p> <p>The Code Manager does however note that in reality for Energy Suppliers and MOAs this is not really a Big Bang implementation, as it is not changing the way of working for all DNOs on the same day.</p>

Question 3:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
National Grid Electricity Distribution (Distribution Network Operator)	Yes, though there will be costs for DNOs to introduce a portal system, the potential benefits from getting images of defects and equipment will outweigh these costs in a short space of time.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	<p>Only that costs are to be anonymised, costs of development and IT implementation of these online solutions are generally with the DNO's. There we believe there will be process updates , data risk reviews and deployment coms for suppliers and MEMS to increase the use.</p> <p>Along with this a review of the controls and the hand-shakes that the D0135 may have with the D0126 and D0368 flows. This may include a preference to maintain the D0135 flows which is already embedded. – so even less change.</p>	<p>Thank you for your comments.</p> <p>The Code Manager has reported the costs provided to it by DNOs and Energy Suppliers at Party impact assessment.</p> <p>While the bulk of the costs to create the online reporting tools does sit with DNOs, there will be costs to Energy Suppliers and MEMs to change their ways of working.</p>
Scottish Power Energy Networks (Distribution Network Operator)	SPEN do not agree with the Code Manager's assessment of costs for this change (which are assumptions). SPEN are not supportive of the DCUSA change and have no plans to implement an online portal for these activities. We are of the view at this point that this is not a mandatory change for DNO to implement, and therefore the costs for us would be zero.	<p>Thank you for your comments.</p> <p>It has already been noted in the Change Report that DNOs have reported no to low costs from the implementation this Change Proposal.</p> <p>Any references to a mandatory centralised portal are the Code Managers opinion that</p>

	<p>Contained within the assessment is reference to a mandatory central database, which we do not believe is the intent of the DCUSA change proposal and would we believe place an additional burden on those parties not intending to develop a portal.</p> <p>We also have fundamental issues with the use of a database for Cat A, rather than a phone call, and see no benefit for Cat B and Cat C being tracked in this manner.</p>	<p>this would be a better option than the currently proposed solution under DCP467. It does not form part of the proposed solution.</p> <p>Again, the reference for a database of Category A reports would be a benefit of a central solution, not the solution as proposed under DCP467. The solution as proposed would not introduce this.</p>
Northern Powergrid (Distribution Network Operator)	Yes. While we agree with RECCo that a centralised online tool would offer greater overall benefit, this falls outside the scope of this change proposal.	Thank you for your comments.
Scottish and Southern Electricity Networks (Distribution Network Operator)	Yes. SSEN agrees with the Code Manager's assessment of the costs and benefits for this change.	Thank you for your comments.
BUUK (Distribution Network Operator)	Yes, though this is not directly impacting us.	Thank you for your comments.
British Gas (Energy Supplier)	We agree with the Code Manager's assessment that differing approaches and the use of multiple online reporting tools across distribution areas create a risk of additional cost and operational inefficiency. We also agree that a single, centralised solution would enable implementation costs to be incurred once across the industry, thereby supporting a more efficient approach and helping to reduce costs for consumers.	Thank you for your comments.
E.ON Next and Npower Business Solutions (Energy Supplier)	<p>Yes, we agree.</p> <p>We note and agree with the identified intangible costs, including the risk of delayed safety-critical reports, duplicated development spend across</p>	Thank you for your comments.

	<p>separate DNO licenses, and increased "time-on-site" labor costs for Suppliers.</p> <p>We fully support the Code Manager's view that the benefits could only be realised by a single, central industry portal owned by a central governance body.</p> <p>As noted by the Code Manager, the benefit of uploading photographs is largely one-sided (for the DNO). For Suppliers, it represents a net increase in data usage and site time without guaranteed operational savings.</p>	The Code Manager has added this cost to Energy Suppliers from additional data usage to the Change Report.
SSE Energy Supply (Energy Supplier)	We consider that the cumulative risks identified by the REC under the category of "intangible costs" outweigh the sole benefit we recognise, namely the alignment with DCUSA DCP467.	Thank you for your comments.
Smart Metering Systems (Data Collector)	Not really able to comment on this but it does seem in line.	Thank you for your comments.
Alt HAN Co (Other)	Neutral - we note that the DCUSA consultation should generate a better understanding of the wider industry costs and benefits, depending on the solution proposed.	Thank you for your comments.
Calisen Metering Services (Metering Equipment Manager)	<p>It is unclear from the Change Report what these costs will be.</p> <p>As per previous responses, we are supportive if there is one system introduced. Either way, we need to try and reduce any impacts to extending time onsite by introducing another system and process to record this information.</p>	<p>Thank you for your comments.</p> <p>The Code Manager can only confirm financial costs to Parties based on what Parties self-report at impact assessment.</p>
Anonymous (Metering Equipment Manager, Crowded Meter Room MOA)	We broadly agree, however the cost impact will largely depend on the level of consistency across DNO reporting systems	Thank you for your comments.

	As per our DCP 467 response, where multiple DNO portals require different processes, this will increase initial and ongoing costs associated with creating and maintaining work instructions, as well as training staff working across multiple areas. A more consistent approach across DNOs would reduce this impact	
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Question 4:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to determination by the Authority following a recommendation by the Metering Expert Panel?	
RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	Yes, I do agree with the changes proposed to the STIRG and Market Messages which are under the control of REC - these should however be shared with the DCUSA group looking at the core changes. If there are any feedback on items other than the STIRG and market message changes - It would be appropriate for the code manager to feedback to DCUSA on any risks that would need to be managed and considered when considering the proposal along with any alternatives that could better fulfil the customer service and efficiencies targeted.	Thank you for your comments. The REC solution has been available for discussion at all DCUSA Working Groups. No feedback has been received on any other impacts to REC documents.
Scottish Power Energy Networks (Distribution Network Operator)	SPEN are of the view that this change proposal can only be implemented if DCP 467 is approved. We do not believe that any recommendation that deviates from the change proposed should be considered at this point. The financial benefits of this (and DCP467) proposal are uncertain and would vary depending on each DNO's current processes, whereas implementation costs are likely to be significant.	Thank you for your comments. There is no proposal under DCP467 (or R0306) to mandate DNOs provide an online reporting tool.

	<p>While we appreciate that different processes for Suppliers/Agents can cause issues, we are not supportive of a mandatory online reporting tool (as per our response to DCP467) and as such would not be developing our own tool.</p> <p>We believe that mandating a tool would need to be raised under a new change proposal, for which we would have costs to implement.</p>	
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.
Scottish and Southern Electricity Networks (Distribution Network Operator)	SSEN agrees with this approach. Given that R0306 is a cross-code change and fully dependent on the outcome of DCP467, it is appropriate that it follows an Authority-led decision to ensure alignment and consistency across both codes.	Thank you for your comments.
BUUK (Distribution Network Operator)	Yes.	Thank you for your comments.
British Gas (Energy Supplier)	We agree, noting the dependency on the DCUSA party vote as outlined in question 5.	Thank you for your comments.
E.On Next and Npower Business Solutions (Energy Supplier)	Yes. Given that this change directly impacts cross-code governance, field-force safety protocols, and introduces significant system and operational costs for market participants, it represents a material change to the retail market. It is entirely appropriate that this change path is Authority Determined.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	As we would like to ensure that the Authority is fully apprised of the concerns raised by both the Code Manager and REC Party respondents, we consider that this change determination should be referred to the Authority.	Thank you for your comments.

Smart Metering Systems (Data Collector)	No, Please refer to previous answers.	Thank you for your comments. The Code Manager has reached out to this respondent for clarity, and the respondent has confirmed this answer was in error and they do believe this Change Proposal should be subject to Authority Determination, and that the Metering Expert Panel are the correct committee to make a recommendation.
Alt HAN Co (Other)	Neutral.	Thank you for your comments.
Calisen Metering Services (Metering Equipment Manager)	It's unclear from the Change Report (and this may be because part of the solution is being proposed by the DCUSA work), whether the proposal is actually for one system to be introduced or for each DNO to have their own (or indeed if they will). In terms of just the changes to REC wording, as per Q1, Calisen are supportive if the change is 'or', leaving us an option to continue reporting via telephone whilst clarity is obtained and our system review is completed.	Thank you for your comments. All DNOs who chose to provide an online reporting tool would be providing their own online reporting tool, and there is no obligation as for a DNO to provide such a tool. As noted within the intangible costs, this could see 41 separate reporting tools introduced (the number of Qualified DNOs).
Anonymous (Metering Equipment Manager, Crowded Meter Room MOA)	Yes – we agree this is the appropriate approach	Thank you for your comments.

Question 5:	Do you agree with the Code Manager's position to match the recommendation to the outcome of the DCUSA party vote (e. g. recommend approval if DCUSA recommend approval, or recommend rejection if DCUSA recommend rejection)?	
RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	It would be appropriate to align the timing, if the DCUSA change was rejected and this remained non mandated – it would still be appropriate to review the words of the Market Message and the STIRG document to reflect the online tool	Thank you for your comments. If DCP467 and R0306 are rejected, the Code Manager would ask any Party who wishes to see the D0135, D0126 or STIRG reviewed to raise a new Issue or Change Proposal.
Scottish Power Energy Networks (Distribution Network Operator)	We believe that it is appropriate for REC to match the DCUSA outcome.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.
Scottish and Southern Electricity Networks (Distribution Network Operator)	SSEN agrees with this position. As R0306 is a facilitating change that is fully dependent on DCP467, it is appropriate that both changes remain aligned to avoid any inconsistencies between the REC and DCUSA frameworks.	Thank you for your comments.
BUUK (Distribution Network Operator)	Yes.	Thank you for your comments.

British Gas (Energy Supplier)	We agree.	Thank you for your comments.
E.On Next and Npower Business Solutions (Energy Supplier)	Yes, we agree that they must be strictly aligned to prevent inconsistency across both codes.	Thank you for your comments.
SSE Energy Supply (Energy Supplier)	Yes.	Thank you for your comments.
Smart Metering Systems (Data Collector)	Yes	Thank you for your comments.
Alt HAN Co (Other)	Yes	Thank you for your comments.
Calisen Metering Services (Metering Equipment Manager)	As per point 4, we need more clarity on what is being proposed to give a view on this, at this stage.	Thank you for your comments.
Anonymous (Metering Equipment Manager, Crowded Meter Room MOA)	Yes, we agree with this approach, as R0306 is directly dependent on and enabling of DCP 467	Thank you for your comments.

Question 6:	Do you agree with the recommendation that if approved, this Change Proposal should be implemented on 06 November 2026 or the next release following Authority decision? If not, please explain why?	
RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
National Grid Electricity Distribution (Distribution Network Operator)	Yes, approved and released at earliest opportunity	Thank you for your comments.
UK Power Networks (Distribution Network Operator)	Yes – it would be a positive step to have the change implemented ASAP, the time scale will be considered in the DCUSA change proposal.	Thank you for your comments.
Scottish Power Energy Networks (Distribution Network Operator)	SPEN believe that there are still some areas of confirmation required from the DCUSA change proposal. If parties who do not operate an online reporting process have no obligation to do so, then there is no change to our process. In this instance the impacted parties would be other party participants.	Thank you for your comments. If SPEN do not operate an online reporting tool, then there will be no changes to your processes. The only impact seen by the Code Manager to SPEN is a potential delay in receiving reports if the On-Site Operative does not know they are working in a SPEN area or does not know which reporting method is used by SPEN.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.

Scottish and Southern Electricity Networks (Distribution Network Operator)	The proposed timeline appears reasonable and proportionate, particularly as some Supplier and Meter Operator parties indicated that approximately six months would be required to implement the necessary changes. With that in mind, SSEN supports the implementation date, however our only consideration relates to the risk identified regarding Meter Operatives not knowing which DNO reporting portal to use in each area. While discussions have taken place within working groups around the development of a potential “landing page” or central entry point to mitigate this risk, this solution does not appear to be formally reflected within the documentation. If such a solution is intended to form part of the overall implementation, greater clarity would be beneficial to ensure that this risk is effectively addressed and that operatives are able to consistently access the correct reporting route.	Thank you for your comments. The potential landing page is an action taken by the DCUSA to investigate if this is possible. The Code Manager will feedback to DCUSA there may need to be a change to their solution, to create an obligation for them to provide this landing page if it is determined it is possible.
BUUK (Distribution Network Operator)	Yes, though this will not impact us currently.	Thank you for your comments.
British Gas (Energy Supplier)	We agree.	Thank you for your comments.
E.On Next and Npower Business Solutions (Energy Supplier)	No. If this Change Proposal is approved, we require a minimum 12-month lead time. A November 2026 date is completely unrealistic. Suppliers will require at least 12 months from the point of final Authority decision to: 1. Re-program internal field-service logic and handheld device scripts. 2. Re-train national field workforces on how to identify which DNO portal applies to which site.	Thank you for your comments. The Code Manager has passed this along to DCUSA to consider as the lead code.

	3. Coordinate with DNOs to ensure that their independently developed portals are strictly harmonised in terms of mandatory data fields, interfaces, and validation parameters.	
SSE Energy Supply (Energy Supplier)	We have no objections to an implementation date of 6 November; however, this change must be delivered in alignment with the implementation of DCP467.	Thank you for your comments. The Code Manager and DCUSA will implement these Change Proposals on the same date if approved. This is being tracked via the Cross Code Steering Group as well as via conversations between the codes.
Smart Metering Systems (Data Collector)	Yes	Thank you for your comments.
Alt HAN Co (Other)	Neutral – we think the implementation should align with the DCUSA proposal.	Thank you for your comments. The Code Manager and DCUSA will implement these Change Proposals on the same date if approved. This is being tracked via the Cross Code Steering Group as well as via conversations between the codes.
Calisen Metering Services (Metering Equipment Manager)	As previous responses, we're happy with November, if the response is an 'or'. If it is going to be online only, we would not agree and would need more time for industry to implement (particularly if not all DNOs have online portals).	Thank you for your comments. The Code Manager will feed this back to DCUSA as the lead code, but discussion at DCUSA held work groups have made it clear that the DCUSA Proposer wishes for this to be mandatory so it is unlikely the solution will be changed to "or".

<p>Anonymous (Metering Equipment Manager, Crowded Meter Room MOA)</p>	<p>We are supportive, subject to appropriate lead time</p> <p>As stated in our DCP 467 response, we would expect a lead time of approximately 3 months, provided DNO work instructions or test environments are made available to support development of work instructions and training materials</p>	<p>Thank you for your comments.</p>
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Question 7:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
National Grid Electricity Distribution (Distribution Network Operator)	No.	n/a
UK Power Networks (Distribution Network Operator)	<p>The text punctuation should be reviewed to more accurately reflect the change - where a DNO has an online tool is should be used for primary reporting of Cat A & B , if not available the report should be via telephone to the SFIC or via the D0135 flow .</p> <p>As a note : where this online tool is used the D0135 is not required but it is the reporting parties choice weather to send or not ; most may continue to send if automated as this can have a handshake link to the D0126, in the background the facility to call in and the D0135 reporting facilities will continue to be maintained by DNO parties (with first serve duplication controls).</p>	<p>Thank you for your comments.</p> <p>The Code Manager has reached out to the respondent for clarity on which text they are requesting is amended.</p> <p>The solution as written does not mandate that DNOs who have an online reporting tool must continue to maintain their D0135 reporting facilities or their phone lines for emergency reporting. UK Power Networks may be taking this stance as to how they will operate, but the solution does not make it mandatory for all DNOs to do so.</p>
Scottish Power Energy Networks (Distribution Network Operator)	The current DCUSA obligation under clause 30.5A.1 to report Cat A faults by telephone appropriately reflects the urgency of these situations and enables real-time information exchange.	<p>Thank you for your comments.</p> <p>Neither the solution under DCP467 or R0306 mandates that a DNO must provide an online</p>

	<p>Introducing an online tool could delay the provision of critical information if immediate contact with the reporter is not possible, thereby increasing safety risks.</p> <p>We believe mandating an online tool for DNOs would be inappropriate for Cat A faults on safety grounds, unnecessary for Cat B faults, and uneconomic for consumers. It would be unlikely to improve customer service for either Relevant Parties or consumers, while introducing significant costs to develop supporting systems and processes. In addition, it would disrupt existing DNO operations by requiring alignment to a mandated approach.</p> <p>The financial benefits of this proposal are uncertain and would vary depending on each DNO's current processes, whereas implementation costs are likely to be significant.</p>	<p>reporting tool, it only mandates that if one is provided it must used.</p>
<p>Northern Powergrid (Distribution Network Operator)</p>	<p>The consultation report seems to be contradictory. In the "Responsible committee decision" section the Code Manager's minded to position is to recommend to the REC MEP to approve the change proposal to go to authority for decision yet in section 12.4 (code manager recommendation) it states the code manager is unable to make a recommendation. However, it then goes on to say it would recommend to reject it in its current form!</p>	<p>Thank you for your comments.</p> <p>The Code Manager is unable make a recommendation on this entirety of the solution as the REC is not the lead code. If the REC were the lead code and able to make a recommendation on the entire solution, that recommendation would be to reject.</p> <p>The Code Manager minded to position is currently to approve, but this may change depending on the outcome of the DCUSA voting. The Code Manager plans to match our recommendation to that outcome.</p>

Scottish and Southern Electricity Networks (Distribution Network Operator)	No.	n/a
BUUK (Distribution Network Operator)	n/a	n/a
British Gas (Energy Supplier)	No further comments.	n/a
E.ON Next and Npower Business Solutions (Energy Supplier)	<p>We strongly urge the Code Manager and the Authority to explore a Standardised Alternative rather than pushing forward with this fragmented proposal:</p> <p>If the industry requires a digital mechanism capable of carrying data and photo evidence that the DTN cannot support, we should utilise the SDEP. As it is an existing, secure, centralised system built specifically to bridge these types of data gaps.</p> <p>Developing a new PT within the SDEP for defect reporting would achieve the DNOs' goal of "enhanced information" while preserving a single, consistent, and safe workflow for all Energy Suppliers and Meter Operatives nationwide.</p>	<p>Thank you for your comments.</p> <p>The Code Manager encourages any Party who wishes to raise a REC Issue or Change Proposal for this be explored. We would however note that work could likely not begin until the outcome of DCP467 and R0306 is known.</p>
SSE Energy Supply (Energy Supplier)	<p>Within the market message report - Asset Condition Report (D0135 / MM00023), we consider that the wording of two statements within the notes section are not aligned, which introduces ambiguity.</p> <p>The first sentence indicates that urgent safety issues (i.e. those involving immediate danger) should be reported via an online tool where available, or otherwise by direct telephone contact with the SFIC. In contrast, the final sentence states that Category A reports will be</p>	<p>Thank you for your comments.</p> <p>The Code Manager has amended all instances of should and will to shall, as this is the preferred language of the REC. The REC Legal Advisors have confirmed that shall does mandate an obligation.</p>

	<p>made via an online reporting tool where provided, or otherwise by telephone.</p> <p>While we support the intent expressed in the first sentence, we do not support the second as currently drafted.</p> <p>This shift from “should” to “will” creates inconsistency in both expectation and obligation. As currently written, this lack of alignment is potentially confusing and would benefit from clarification to ensure a consistent reporting approach.</p>	
Smart Metering Systems (Data Collector)	I feel a national DNO portal would be needed to enable this to happen.	Thank you for your comments.
Alt HAN Co (Other)	No	n/a
Calisen Metering Services (Metering Equipment Manager)	Nothing further to add.	n/a
Anonymous (Metering Equipment Manager, Crowded Meter Room MOA)	As set out in our DCP 467 response, a UK-wide or more standardised approach to defect reporting would be preferable to multiple DNO-specific portals. This would reduce operational complexity and the manual effort required to manage and reconcile data across different systems	Thank you for your comments.