REC SUPPLIER OF LAST RESORT (SOLR) WORK GROUP
MEETING 3 - MEETING NOTES

DATE	**12 March 2026 (10:00 – 12:00)**
LOCATION	**Via Microsoft Teams**

Presenter	Representing	Initials	Role
Glenn Sheern	REC Code Manager	GS	Subject Matter Expert
James Hardy	REC Code Manager	JH	Chair / Senior Change Lead

Full attendee list available upon request.

1. INTRODUCTIONS

The Chair welcomed attendees to the third Supplier of Last Resort (SoLR) Workgroup meeting and thanks members for their patience since the first meeting and continued engagement as the group progresses further analysis of the SoLR process.

2. AGREEMENT OF LAST MEETING NOTES

Minutes from Meeting 2 were circulated in advance. No comments were received, and the notes were approved without amendment.

3. RECAP OF SECOND SESSION AND PREVIOUS ACTIONS

JH provided an overview of the discussions held during the second Workgroup meeting. JH reminded attendees of the following, on-going actions.

- Reviewing the feasibility of codifying SoLR processes across CSS, MHHS, Smart and Traditional Systems.
- Drafting of a SoLR Best Practice Guidance Document.
- Continue to gather and analyse outstanding reporting-related issues.

4. REC REPORTING REQUIREMENTS

Attendees reviewed and discussed the SoLR reporting obligations on Ofgem, DNOs, GES, the Replacement Supplier, and the Code Manager, then worked through the remaining requirement references (references 1–18 plus PML and unallocated transactions from the SoLR Lesson Learnt spreadsheet).

4.1. ACCESS TO METER POINT DATA AND EES/DNO ROLES AND RESPONSIBILITIES

Attendees discussed persistent difficulties faced by replacement suppliers when sourcing electricity Meter Point data during SoLR events. While the REC requires DNOs to provide this data, suppliers explained that DNOs rarely fulfil this obligation in practice. Instead, suppliers rely on EES ad hoc reports, workaround not aligned with the code's intended design. Multiple participants explained that data requests often vary in structure and content between Energy Suppliers, making the process inefficient.

The EES Service Provider emphasised the need for an agreed and standardised reporting template, mirroring the approach already in place for GES. It was noted that although EES is responsive to ad hoc requests, the lack of a clear template leads to inconsistent expectations. GS added that the industry's real-world reliance on EES, rather than DNOs, means the REC's wording may no longer reflect operational realities and may therefore require

The group agreed that the Code Manager should review both the schedule's wording and historical arrangements with EES to determine how best to formalise a reliable reporting route.

4.2. SUITABILITIY AND TIMELINESS OF DNO DATA

Attendees discussed whether DNO-provided meter data is fit for purpose, given that most attendees had never seen it delivered in practice. The Workgroup felt the central issue was not that DNO data was inaccurate, but that it simply does not arrive, forcing Energy Suppliers and service providers into reactive arrangements.

Attendees explained that data timeliness is critical: citing past SoLR events where Switching activity continued right up to (and even immediately before) the SoLR appointment announcement. This meant that any dataset produced even a day earlier risked being outdated. Representatives from both DCC and EES confirmed that during recent SoLRs, the same data had sometimes been requested two or three times within days due to the rapid pace of Switching updates.

Several attendees expressed their support for sourcing data from central systems (EES, GES, CSS) instead of DNOs, arguing that centralisation would reduce inconsistency, administrative burden and the risk of divergence between datasets.

JH and GS agreed to explore further the feasibility of using central systems as the authoritative data source for SoLR events.

4.3. TRACKING OBLIGATIONS ACROSS MULTIPLE PARTIES AND SDEP ACCESS

Attendees discussed the complexities of managing SoLR obligations when responsibilities straddle different Parties and stakeholders, particularly DNOs, administrators, and service providers. The lack of direct communication routes between some Parties, such as Energy Suppliers and DNOs, was said to slow down issue resolution.

There was specific focus on SDEP access and message handling. The EES Service Provider clarified that when an MPID transfers to a new Energy Supplier during a SoLR, SDEP users do not

automatically migrate, contrary to a common misconception. Access rights are managed at the MAU (Market Participant Administrator) level, meaning explicit instructions are required to add, remove or transfer users, and these decisions often depend on the involvement and cooperation of administrators.

It was further noted that there is a difference between active and archived SDEP messages, with most Gaining Suppliers currently requesting only active items, though the system can provide historical data if needed.

The Workgroup discussed how administrators behave inconsistently across SoLR events. Some retain staff who can support system access; others revoke access prematurely, causing delays. The Workgroup agreed that this highlighted the need for clearer expectations on administrator behaviour and for more formal instructions on SDEP user management and archived data.

4.4. INCONSISTENCIES BETWEEN OFGEM DATA AND ENQUIRY SERVICES

Attendees raised concerns about discrepancies between the portfolio datasets provided by Ofgem at the point of SoLR appointment and the contemporary data available in EES or GES.

JH explained that Replacement Suppliers find that mismatches in MPAN or MPRN occur, particularly between Domestic and Non-Domestic classifications, and this has previously delayed the submission of SoLR migration plans and risked delaying the start of Switching activity.

The Workgroup generally agreed that the Enquiry Services (EES and GES) should produce a standardised SoLR report on day zero, followed by scheduled repeat reporting aligned with the migration plan. This would reduce uncertainty and avoid the need for multiple ad hoc data refreshes, which currently place additional strain on service providers during time-critical periods.

4.5. DIFFERENCES IN AVAILABILITY BETWEEN EES AND GES REPORTING

JH explained that a recurring issue noted by Parties involved in previous SoLR events, was the uneven availability of data between GES and EES. GES data is available “on demand,” whereas EES data is only issued once a formal change request is submitted to the service provider.

The EES Service Provider clarified that EES does not delay on purpose; rather, the Code obligates GES to provide SoLR data but does not explicitly obligate EES. As a result, EES waits for formal instruction via a CR (Change Request) before actioning a report.

Many attendees supported the idea of formally incorporating EES into the SoLR reporting process to improve consistency.

4.6. UNALLOCATED PPM TRANSACTIONS

GS explained that under the current REC arrangements, SoLR events are excluded from the unallocated transactions process. This has caused confusion, particularly among Energy Suppliers expecting to receive prepayment credit allocations following a SoLR.

GS described how the earlier MRA process differed, including the use of independent audits, and noted that the industry may need to revisit whether the current approach remains fit for purpose.

The EES Service Provider explained that EES can provide extensive reporting on unallocated transactions but noted that many Energy Suppliers are unaware of the available reporting.

4.7. PREPAYMENT METHOD LEVELISALTION (PML) CONSIDERATIONS

Attendees were asked whether the PML should be explicitly included within the SoLR process. No firm views were offered during the meeting, and the Workgroup acknowledged this is a niche area affecting only a small subset of stakeholders.

JH confirmed that further targeted engagement with impacted stakeholders will be required to understand the potential implications.

4.8. PORTFOLIO NON-SUBMISSION AFTER A SOLR EVENT

JH and GS presented concerns previously raised about the absence of clarity regarding which dataset should be used in cases where a Replacement Supplier fails to submit their portfolio following a SoLR event.

As attendees had no direct experience with this scenario, the Workgroup agreed that the Code Manager would need to conduct offline analysis and consult directly with affected Parties.

4.9. TIMING OF SUPPLIER RESPONSIBILITIES FOR SUBMISSIONS, PAYMENTS AND CREDITS

Attendees discussed the ambiguity surrounding when the gaining supplier becomes responsible for portfolio submission, invoice payments, and credit receipts. Since Schedule 31 does not clearly define this transition point, stakeholders have expressed confusion during past events.

Limited discussion was held as attendees confirmed they did not have direct experience of the process.

JH and GS agreed that the Code Manager will review this gap and propose options for clearer drafting.

4.10. LATE PAYMENT PROCESS AND ADMINISTRATOR BEHAVIOUR

A question was raised regarding how the standard late-payment process should apply when administrators, rather than Energy Suppliers, are responsible for settling invoices. As no attendees had direct cases to reference, JH and GS confirmed this issue will also be analysed offline and that the Code Manager will reach out directly to impacted Stakeholders.

5. AOB.

The Chair invited items of any other business. No additional items were raised.

JH noted that the group had now held three meetings that covered Consumer considerations, reporting challenges and broader systemic issues. JH encouraged members to raise any topics for inclusion in future agendas, either during meetings or via email.

6. NEXT MEETING AND CONTACT

The next meeting is planned for Thursday 16 April 2026 (10:00 – 11:30), with pre-meeting papers due to be circulated by 09 April 2026.

Any queries, or further feedback can be directed to the Code Manager via the standard enquiries and change management mailboxes, as well the relevant Senior Change Lead and Subject matter expert, below.

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