RETAIL ENERGY CODE

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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	Final Recommendation

CHANGE REPORT

R0322 – ERRONEOUS SWITCH REVIEW: I0237 CLARIFICATIONS

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	06 November 2026
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Change Panel	CHANGE PATH	Self-Governance
PRIORITY STATUS	Medium	URGENCY	Standard
IMPACTED STAKEHOLDERS	Consumers, Energy Suppliers		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

The I0237 working group has carried out an end-to-end review of the Erroneous Switch process. The working group highlighted housekeeping changes and clarifications within Schedule 30 – Resolution of Consumer Facing Switching and Billing Issues and the Market Messages that should be implemented as soon as possible.

CODE MANAGER RECOMMENDATION

The Code Manager recommends that the REC Change Panel:

- **APPROVE** the Proposal Plan, including the Responsible Sub-Committee, Change Path, Priority Status, Urgency and timetable.

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BACKGROUND

1 SUMMARY

R0322 seeks to correct drafting inconsistencies, inaccuracies, and terminology issues within the Erroneous Switch (ES) provisions of the REC, primarily Schedule 30 – Resolution of Consumer Facing Switching and Billing Issues and associated Market Messages. An end-to-end review of the ES process carried out by the I0237 – Erroneous Switch Review working group identified that elements of the current drafting do not fully or accurately reflect the intended governance, contractual, and operational arrangements. These issues have the potential to cause confusion and misunderstanding between Energy Suppliers when navigating ES requirements.

The working group highlighted several specific areas where clarifications and minor corrections are required. For example, the RET Erroneous Switch Market Message (MM40007) currently references Schedule 10 rather than the correct Schedule 30, creating ambiguity about the applicable governance framework. More broadly, the review identified the need for consistent and accurate terminology across Schedule 30, Market Messages, and Data Items, in order to better reflect current process arrangements.

The amendments and clarifications proposed include replacing references from “Customer” to “Consumer”, aligning terminology by updating “Transfer” to “Switch”, amending Erroneous Switch Reason Code descriptions to more accurately reflect dual fuel scenarios where appropriate, and clarifying when the ES flag should and should not be used. These updates are supported by revised legal text, updated Market Messages, and amended Data Items, all of which are intended to improve clarity and consistency.

The I0237 working group identified these corrections and clarifications as quick wins that can be progressed independently of, and in parallel with, the ongoing I0237 work. R0322 will provide an approach to implement these targeted improvements promptly, reducing the risk of misinterpretation, strengthening legal clarity, and supporting more effective and consistent application of the ES process by all Market Participants, while wider I0237 activity progress in line with the I0237 scope.

2 PROBLEM STATEMENT

The current ES drafting contains inconsistencies that can cause confusion and misunderstanding between Energy Suppliers regarding the applicable governance and process requirements, creating ambiguity around the correct contractual and operational framework. In addition, the I0237 Working Group has identified further required amendments to Schedule 30, highlighting that the existing drafting does not fully or accurately reflect intended process arrangements or correct terminology.

3 IMPACTS

CONSUMERS	REC PARTIES AND SERVICE USERS	REC DOCUMENTS / PRODUCTS
All	Energy Suppliers	Schedule 30 - Resolution of Consumer Facing Switching and Billing Issues
		Data Specification

MHHS
No impacts.

4 CROSS-CODE IMPACTS

No cross-code impacts have been identified by the Code Manager at this stage.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Change Proposal		**01 May-26**	**19 Oct-26**
	Change Issues Group Engagement	May	July
	Legal Review	May	May
	Party Impact Assessment	June	July
	Solution Refinement	August	August
	Consultation	September	September
	Final Recommendation	October	October
Voting		**20 Oct-26**	**20 Oct-26**
	Appeal Window	21 October	04 November

6 STAKEHOLDER ENGAGEMENT

Solution analysis and development for R0322 have been informed by stakeholder feedback gathered through the I0237 working group, which highlighted that the current ES drafting in Schedule 30 contains inconsistencies and inaccuracies that can create confusion between Energy Suppliers regarding the applicable governance, contractual, and operational requirements. In particular, the working group identified that certain aspects of Schedule 30 do not fully reflect the intended process arrangements or apply correct and consistent terminology, indicating the need for targeted drafting corrections.

To support the development of an appropriate and legally robust solution, the Code Manager will undertake further targeted stakeholder engagement through the Change Issues Group between May and July 2026, alongside a legal review during May 2026. This engagement will focus on discussing the findings of the legal review, reviewing potential legal drafting options, and

confirming the appropriate scope of amendments (including considering the scope of further Issues and Change Proposals relating to the ES review) required to address the identified inconsistencies prior to progression of the Change Proposal.

Following completion of the Change Issues Group engagement and legal review, the Code Manager will issue a Party Impact Assessment between June and July 2026. If possible, this Party impact assessment will align with the impact assessment for R0313 – Erroneous Switch Review: Amendments to Clause 4.5, to support Parties' capacity and assessment of the relevant aspects of the ES process.

While engagement to date has not identified any adverse operational, system, or Consumer impacts arising from the proposed clarifications to the ES arrangements, the Party impact assessment will be used to formally assess this position.

Subject to the Change Proposal continuing to progress following consideration of Party impact assessment responses, the solution will be refined in August and subsequently consulted on through a standard industry consultation in September, covering any updated legal drafting and proposed implementation approach, ahead of a Final Recommendation and vote in October.

7 PRIORITY STATUS AND URGENCY

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	1	27	27
	Retail Markets Impact	Innovation and Market Arrangements	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	1	14	14
Resource	Complexity / Effort / Duration		3	9	28
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		0	17	0
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	1	10	10
				Overall Priority Score (rounded)	125

Priority Status	MEDIUM
Change Proposal Type	STANDARD

This Change Proposal has been given a medium priority status based upon a weighted prioritisation score of 125.

SOLUTION

8 PROPOSED SOLUTION

The proposed solution for R0322 includes drafting corrections and clarifications to the ES arrangements within the REC, including to Schedule 30 and associated Market Messages and Data Items.

The legal drafting to accompany the proposed solution can be accessed here. A summary of the proposed changes is detailed below.

8.1 SCHEDULE 30 – RESOLUTION OF CONSUMER FACING SWITCHING AND BILLING ISSUES

The proposed solution includes a number of terminology and drafting updates to Schedule 30 to ensure consistency with current market arrangements and REC documents. References to "Customer" will be amended to "Consumer", "Transfer" to "Switch", and "MPAN" to "MPxN", aligning with standard REC terminology and improving consistency across schedules and processes.

A new table setting out ES reason codes, including the code, name, and description, has been added to improve transparency and ease of reference. Further, the description of the ES reason code "technical" has been clarified to better reflect its original intended application

Paragraph 5.3 has been removed to ensure that the Erroneous Switch provisions do not conflict with existing Settlement obligations. Paragraph 6.5(d) has also been clarified to more clearly set out the circumstances in which it should apply, supporting more consistent interpretation and application of the process.

8.2 ERRONEOUS SWITCH FLAG DATA ITEM

Clarifications have been made to the ES Flag Data Item to confirm that it represents the final step in the ES process. The proposed solution also clarifies that the Enumerations associated with this Data Item are single letter values, reducing ambiguity and supporting consistent implementation across systems.

8.3 RET AND GAS DATA ITEMS

Updates to the RET and gas ES Data Items are proposed to align terminology with Schedule 30 and electricity arrangements. This includes replacing "Customer" with "Consumer", "Transfer" with "Switch", correcting references from Schedule 10 to Schedule 30, and updating "Current" to "New" and "Original" to "Old" where applicable.

ES reason code descriptions have been amended to align with the electricity descriptions, while retaining the existing underlying values. Status response descriptions have similarly been amended to match electricity, again with no change to the values themselves, ensuring dual-fuel consistency without introducing system impacts.

8.4 D0301 AND ELECTRICITY DATA ITEMS

For D0301 and related electricity Data Items, the proposed solution includes equivalent terminology updates from "Customer" to "Consumer" and from "Transfer" to "Switch". ES reason code descriptions have been amended to align with the gas arrangements, with no changes to the existing values.

9 APPENDIX

CHANGE PROPOSAL	Link
I0237 WORKING GROUP	Link
LEGAL DRAFTING	Link
RELATED CHANGE(S)	I0237 – Erroneous Switch Reivew: CSS Solution R0322 – Erroneous Switch Review: I0237 Clarifications
ANY OTHER DOCUMENTS	Schedule 30 – Resolution of Consumer Facing Switching and Billing Issues

10 GLOSSARY

TERM	DEFINITION
Consumer	means any person supplied (or seeking a supply) of Energy at an RMP (whether or not that person also exports or is seeking to export electricity at an RMP).
Data Item	means the most granular level of data defining a specific attribute in respect of a data type, the permissible values for which are defined and controlled in the Data Item Catalogue.
DI40213 – Status Response RET	Description of the status for RET files.
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Erroneous Switch	means where a Consumer has been switched to an Energy Supplier which does not have an Energy Contract in place, as further described in the Resolution of Consumer-Facing Switching and Billing Issues Schedule.
Gaining Supplier	means, in relation to a proposed Switch (or Switch), the Energy Supplier which is proposing to become the Registered Supplier at an RMP as a result of that proposed Switch (or which has become the Registered Supplier as a result of that Switch).

TERM	DEFINITION
Market Message	means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification.
MpXN	means the collective description of the MPAN and MPRN when used together.
Switch	means a change to the Registered Supplier for an RMP.