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I0237 WORKGROUP 3
MEETING MINUTES

MEETING	**I0237 WORKGROUP 3**
DATE	**06 November 2025, 13:00**
LOCATION	**Via Teams**

Presenter	Representing	Initials	Role
James Hardy	REC Code Manager	JH	Lead Change Analyst
Lorna Mallon	REC Code Manager	LM	Regulatory Specialist (Chair)
Bailey Robb	REC Code Manager	BR	REC Performance Assurance
Keisha Patel	REC Code Manager	KP	REC Technical Services
Jonathan Hawkins	RECCo	JoH	Director of Market Design

Full attendee list available upon request.

1 INTRODUCTIONS

The Chair welcomed attendees to the I0237 Workgroup meeting.

2 CONFIRMATION OF AGENDA

The Chair invited any additional items of business for consideration during the meeting, but no items were raised.

3 ACTION LOG

LM ran through the actions log, and confirmed that following a conversation with Ofgem, the consideration of Micro-business requirements had been added. This is expected to be discussed in a future Working Group, likely in the early 2026.

4 MEETING MINUTES

4.1 ERRONEOUS SWITCH GUIDANCE DOCUMENT

LM confirmed the draft Erroneous Switch (ES) Guidance Document was issued as part of the meeting papers for review prior to the meeting. LM confirmed that the document was currently incomplete, and the Code Manager planned to add to it as the Working Groups progressed.

The Use of Erroneous Switch Flag section has been updated following the discussions at Working Group 2, confirming the flag should only be used when the D0301 process has been completed and an ES has been agreed. LM opened the floor to comments and invited further comments via email. One comment was made by a REC Operational Account Manager (OAM) that clarity could be added to confirm it is regarding ES resolution rather than prevention, but otherwise no comments were raised. LM confirmed this document would be published on the REC Portal W/C 10 November 2025 for wider review.

4.2 NON-DOMESTIC GAS SUPPLIERS THAT DO NOT USE THE DTN

LM confirmed that the ES process is voluntary for Non-Domestic Gas Suppliers in Schedule 30. It was proposed a list of Suppliers who have opted into this process be hosted on the REC Portal, as I0237 is not looked at mandating this process for these Parties.

LM opened the floor to comments. A Working Group member confirmed this would be useful in knowing whether to send a flow or use another method. A second Working Group member asked if it was possible to also include those Suppliers who have not opted into this process – LM confirmed the Code Manager would use best endeavours, but it may not be fully populated if a Supplier chose not to respond either way. LM confirmed it would not be mandatory for Suppliers to be on this list.

LM confirmed the Code Manager would move on this action shortly and try to get a first draft ready over the next few weeks. LM confirmed expectations on when this would be published and available would be provided at the next Working Group.

4.3 ERRONEOUS SWITCH REASON DESCRIPTION

LM provided a summary of the current ES reason codes.

For electricity (J1671 / DI50997):

A	Forgery - PROVEN
B	Misleading Information / Suspected Fraudulent Marketing Practice and / or Training Issues
C	Cancelled Contract Not Actioned
D	Incorrect MPAN Selected
E	Customer Service Returners
F	Technical Issues

For gas (B0029 / DI40212):

C	Goodwill Customer return
F	Fraudulent marketing practice (proven)
I	Incorrect MPRN selected by the New Supplier
M	Suspected misleading information, fraudulent practice (unproven) or training issues
U	Failed/unprocessed contract cancellation by the New Supplier

LM opened a discussion on updating these descriptions as they do not match between fuels and that not all Parties are interpreting the reasons in the same way. LM confirmed initially that guidance on when to use each reason would be put in the guidance document but longer term the Code Manager is looking to have this in Schedule 30.

LM provided a summary of the number of ES's by reason, up until June 2025, and of the number accepted, rejected and unactioned.

LM presented the historic legal text was listed under the MRA and SPAA as well as the REC Transitional Schedules but was not included in Schedule 30. The historic text was not included in Schedule 30 as it was recognised as guidance rather than a mandatory requirement. LM stated that given the reasons already discussed there is merit in using these as a potential place to start at looking at the new guidance/definitions for each reason.

LM proposed new reasons which are used for both fuel, new definitions for each new reason and opened these up the Working Group for comments. No comments were provided on the suggested definition of:

- Forgery – Proven;
- Incorrect MPXN Selected;
- Cancelled Contract Not Actioned; or
- Misleading Information / Suspected Fraudulent Marketing Practice and / or Training Issues.

LM proposed the removal of Technical Issues due to the data cleanse activity which has ensured that most Related MPANs are now correctly with the same Energy Supplier. However, the numbers of use of this reason are higher than expected, so LM asked the Working Group if this reason is being used for other reasons.

A Working Group member confirmed that it has been used historically when a contract is accidentally signed for a meter type or set-up, they cannot support but that it hasn't been used for a while, so they are happy to have it removed. A second Working Group member confirmed they were also happy for it to be removed as they see it used incorrectly most times they see it, and they were happy to see Goodwill Consumer Return be used for any meters that cannot be

supported. A third Working Group member confirmed they do not raise an ES for Related MPANs where only once is taken, they would agree a contract on the second MPAN.

JoH asked the Working Group if anyone is using Technical Issues to raise ES's on Related MPANs due to data quality issues (e.g. Related MPANs that should be grouped but aren't). LM added this could include Related MPANs which are found to be incorrectly Related after the Switch, and one needs to be sent back. No comments were received from the Working Group.

JoH stated a preference for this reason to remain as the data cleanse is not 100% complete and removing it may cause other operational issues down the line, but with a definition to make it clearer it is for Related MPANs only. A Working Group member agreed with this.

LM confirmed that while the data being shared with the Working Group is anonymous, the Code Manager could get the Suppliers that are using it from Performance Assurance and reach out to them directly via the OAMs for confirmation of the situations in which it is being used.

A Working Group member asked if they receive an ES request where the reason code is incorrect, but the ES is valid, should they be rejecting or accepting the ES. LM confirmed if you are the Gaining Supplier and the Losing Supplier has initiated, only the Gaining Supplier can confirm the reason for the ES. In this scenario, LM confirmed the expectation is the Gaining Supplier should accept but update the reason code to be correct. If you are the Losing Supplier and the Gaining Supplier has initiated with an incorrect reason code, LM confirmed this shouldn't be updated as the Gaining Supplier should know the reason for the ES.

LM added that for Domestic, there is a licence condition that states unsupported meter types cannot be a reason for an ES. LM took an action to come up with a new definition for Technical Issues.

LM asked the Working Group whether Goodwill Consumer Return is still required, as with five day Switching this is often much faster than an ES, plus allow the Consumer to go to whichever Supplier they wish (rather than having to go back to their previous one).

A Working Group member confirmed they only use in the cases of a complaint and used as a last resort and confirmed they agree with the reasoning for removing it as the complaint can be resolved with a goodwill payment instead.

A second Working Group member confirmed they use it in the case when the Consumer used a Broker and there is a difference between the contract agreed with the Broker and the contract in place with the Supplier. LM confirmed Misleading Information could be in used in this case.

A third Working Group member confirmed their preference would be to keep it as they believe it is a better Consumer experience (rather than putting the onus on the Consumer to take the action to Switch away).

LM asked the Working Group for views on whether the ES flag should be used in cases of Goodwill Consumer Return as it is arguably not a true ES. A Working Group member said they could see a case for both having it and not having it, with the advantage being that it should stop an objection being raised in error. A second Working Group member confirmed they agreed it should not be used in this situation.

JoH asked whether it was necessary to use this process and in what circumstances. LM confirmed it was so that both Suppliers did not bill for the same time period, but that she would take an action to speak to some Suppliers offline regarding this.

LM asked the Working Group if there are any other reason codes which need to be added. A Working Group member confirmed Change of Occupier (CoO) before a Switch that was not identified would be useful as a separate option. LM suggested if it was worth investigating created a new Non-Domestic only ES reason for TPI sales given the recent DESNZ determination. The Working Group agreed to review it at a future meetings and LM took an action to draw up a proposal.

4.4 ERRONEOUS SWITCH REASON CODES

LM proposed two solution options for updating the reason codes.

Option 1:

G	Forgery – Proven
B	Misleading Information / Suspected Fraudulent Marketing Practice and / or Training Issues
C	Cancelled Contract Not Actioned
D	Incorrect MPXN Selected
E	Goodwill Consumer Return
F	Technical Issues

These would be used for both fuels.

Forgery – Proven has been updated from A to G, to reduce the risk it is selected in error from being at the top of the list.

Option 2:

Z	Incorrect MPXN Selected
Y	Cancelled Contract Not Actioned
X	Misleading Information / Suspected Fraudulent Marketing Practice and / or Training Issues
W	Forgery – Proven

V	Goodwill Consumer Return
U	Technical Issues

These would be used for both fuels.

JoH suggested that option 2 may be easier to use for Suppliers and Performance Assurance, as reusing codes may be confusing (e.g. C or U mean one thing if sent on one date, and another thing if sent on another date).

LM took an action to check there was no duplicates with response codes.

4.5 SUPPLIER OF LAST RESORT (SOLR) AND IN-FLIGHT ERRONEOUS SWITCHES

LM provided a summary of the issue being seen, with the main two being a SoLR occurring while an ES is in progress or an ES being identified after a SoLR has occurred. A Working Group member confirmed this is a large issue but is not limited to the ES process and includes others including Disputed Switch Reads.

A second Working Group member suggested that once a SoLR has occurred, it should be accepted ES's cannot be resolved and the Consumer should be told they can stay with the current Supplier or move to another Supplier. It was suggested this should be in the Schedule. Another Working Group member agreed with this but suggested this should be discussed with Ofgem as this decision would likely need to be made by them.

A third Working Group member confirmed for incorrect gains, they tell the Consumer their previous Supplier no longer exists so they cannot be returned to them, and the choice is theirs whether they stay or Switch to a new Supplier. For incorrect losses, they would attempt to gain it back from the SoLR Supplier and encourage the Consumer to contact the SoLR Supplier to say they wanted to return to them.

A fourth Working Group member confirmed that SoLR is a valid reason for cancelling an ES, and that incorrect losses were the greater problem. LM took an action to add the SoLR cancellation option to the guidance document.

LM proposed a guidance document could be drafted to cover these scenarios and confirmed it would not be published for comment until it had been reviewed by Ofgem. Another option is to hand this over to the current SoLR Working Group for review, as they could look at ES, Disputed Switch Reads, Crossed Meters and other operational processes impacted by SoLRs.

A Working Group member confirmed their preference would be the second option, as it needs a wider conversation. LM took this as an action. JH confirmed the first meeting of the SoLR Working Group is 11 November 2025, with the second one scheduled for 11 December 2025. LM informed members they could still sign up for the SoLR Work Group if they wished.

5 ACTIONS AND NEXT STEPS

LM confirmed the topics due to discussion at the next Working Group meeting were alternative solutions to the DTN flows (for example, CSS flows) and a review of data and discussions to date. The second may be postponed to January depending on how much time is needed on the first item.

Item	Responsible	Status
Draft and publish Erroneous Switch Flag Usage Guidance	Lorna Mallon & James Hardy	Completed – to be updated as Working Group Progresses
Review options for reducing Erroneous Switch time limit	Lorna Mallon & James Hardy	Next meeting (December)
Engage with Ofgem regarding Non-Domestic contract issues	Lorna Mallon & James Hardy	Completed – Micro-business added as a topic for a future Working Group meeting.
Review escalation process	Lorna Mallon & James Hardy	Next meeting (December)
Explore multilateral Erroneous Switch resolution options	Lorna Mallon & James Hardy	Future meeting
Discussion on Alternative Solutions to the DTNS Flows	Lorna Mallon & James Hardy	Next meeting (December)
Review of Erroneous Switch Data	Lorna Mallon & James Hardy	Next meeting (December)
New definition for “Technical Issues” reason code and to ensure there are no reason code duplicates	Lorna Mallon & James Hardy	Future Meeting
New reason code for Non-Domestic only to account for TPI Sales and discussion with Ofgem	Lorna Mallon & James Hardy	Future Working Group meeting following Code Manager discussion with Ofgem.
Draft template for Non-Domestic Gas Suppliers Contacts and circulate via OAMs for Population	Lorna Mallon & James Hardy	Update to be provided at next meeting (December)

6 AOB

There was no AOB raised at the meeting.

7 DATE AND TIME OF NEXT MEETING

The next meeting is scheduled 11 December 2025 (13:00 – 14:30).