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I0237 WORKGROUP 6
MEETING NOTES

MEETING	**I0237 WORKGROUP 6**
DATE	**19 February 2026, 13:00**
LOCATION	**Via Teams**

Presenter	Representing	Initials	Role
James Hardy	REC Code Manager	JaH	Lead Change Analyst
Lorna Mallon	REC Code Manager	LM	Regulatory Specialist (Chair)
Bailey Robb	REC Code Manager	VCS	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 sixth I0237 Workgroup meeting.

2 CONFIRMATION OF AGENDA

The Chair presented the meeting agenda and invited members to raise any additional items of business, but none were proposed. LM noted that the Code Manager had included several AOB items to ensure they were addressed ahead of the next workgroup meeting to ensure momentum is maintained.

3 ACTION LOG

LM ran through the actions log, confirming the actions that had been closed since the previous meeting and provided an update on the status of all and open actions. A full list with the latest status can be found in the meeting slides (Slides 4-6).

4 REVIEW UPDATED GUIDANCE DOCUMENT

LM provided an update on the latest additions to the Erroneous Switch Guidance Document. LM confirmed that the section on domestic rejection reasons has now been drafted and reviewed and noted that no Energy Supplier feedback has been received since the previous meeting. LM

clarified that equivalent Non-Domestic rejection reasons have not yet been incorporated and will be added in a future update.

LM explained that the technical rejection reason code has been retained using legacy MRA wording, supplemented with updates introduced ahead of CSS go-live. LM advised that the current intention is to keep this reason code in place, although it may be considered for removal in a future change if a sufficient business case can be made. LM asked Energy Suppliers whether they were using the technical reason code for purposes outside its original intent, and no such uses were reported.

LM also confirmed that escalation routes will be added to the document, accompanied by a simplified overview to help clarify them. LM confirmed that these updates will be included in the next published version of the Guidance Document, in the week following workgroup 6.

5 FEEDBACK ON EXISTING PROCESSES OR ISSUES

5.1 MHHS PROGRAMME

LM provided an overview of the MHHS-related issues previously discussed by the workgroup. During this discussion, a workgroup member raised an additional query regarding whether Energy Suppliers are required to share Half-Hourly consumption data once a Consumer has left supply. LM confirmed that, for Smart Meters, this functionality is already supported within the MHHS Programme. For Non-Smart Meters, JaH confirmed that data sharing obligations are covered by REC Change Proposal R0205, which introduced a reporting template and requires Energy Suppliers to share this information; this change was implemented in November 2025.

LM proposed that MHHS topic be closed unless a new issues emerges, and no objections were raised by workgroup members. The topic was therefore agreed to be closed.

5.2 CONSUMER BILLING

LM addressed a previous query on whether the REC should include obligations or SLAs requiring the Losing Supplier to issue bills to Consumers within a certain timeframe. LM expressed their view that the REC should remain deliberately non-prescriptive in these areas due to the existence of back-billing obligations and because Energy Supplier's ability to bill can vary significantly depending on circumstances. LM also noted that introducing such obligations may also set unrealistic Consumer expectations and/or create unnecessary compliance burdens.

LM proposed to now close this topic, and no objections were raised from workgroup members.

5.3 CHANGE OF SUPPLIER READS

LM led a discussion on whether Energy Suppliers require any further clarification on responsibilities for Change of Supplier reads during, or after, an Erroneous Switch, particularly in relation to disputed reads. LM noted that most Change of Supplier read related issues resolve themselves under existing processes and that the workgroup had not requested any specific changes in previous meetings.

Workgroup members expressed their view that no changes were warranted and agreed for the topic to be closed.

5.4 PHONE LINE REQUIREMENTS

LM explained that Supplier-to-Supplier phone lines for managing Erroneous Switches remain a mandated requirement under the REC, despite their relatively low usage across the market.

Several Energy Suppliers indicated that they continue to value maintaining these phone lines, while others stated that they now rely predominantly on SDEP due to the clearer audit trail it provides. Non-Domestic Supplier representatives emphasised that the phone line remains particularly useful for resolving complex cases, such as instances where a site has moved between Domestic and Non-Domestic supply and where real time discussion can prevent unnecessary delays or Consumer detriment.

The workgroup agreed that the phone line requirement should remain in place at this time and that the topic could be closed. LM noted, however, that REC may revisit the requirement in future if the operational burden of maintaining phone lines begins to outweigh their value.

5.5 OMBUDSMAN PROCESS

LM provided an overview of the proposal for the Ombudsman to notify both the Gaining and Losing Supplier when directing a Consumer to the use of the Erroneous Switch process.

LM asked the group if they had any further suggestions, but none was provided. LM confirmed this would now be documented and shared with the Ombudsman.

5.6 OBJECTIONS FOLLOWING AN AGREED ES

LM led a discussion on Erroneous Switch cases that have been identified where the Energy Supplier at fault objects when the valid Energy Supplier initiates re-registration after an Erroneous Switch has been agreed. Workgroup attendees agreed that most cases will likely result from timing issues.

LM confirmed that this will be reviewed with REC Performance Assurance.

5.7 ERRONEOUS SWITCH AND VULNERABLE CONSUMERS

LM led a discussion on whether the impacts of Erroneous Switches on Vulnerable Consumers and whether the Erroneous Switch process required explicit Priority Services Register (PRS) handling rules. Workgroup attendees stated that there is no need for a standalone process, but any PSR updated received during an Erroneous supply period should be shared with the Gaining Supplier. This could be via SDEP or a separate template. One workgroup member noted that legal considerations should be made to ensure that PSR sharing complies with informed consent.

LM confirm they would draft legal text on the PSR process for ES's and noted that further DNO involvement may be required.

6 ANY OTHER BUSINESS

6.1 MICROBUSINESS AND THIRD-PARTY INTERMEDIARIES REASON CODES

LM revisited a previous discussion on providing Energy Suppliers with a method to flag Microbusiness or Third-Party Intermediary related Erroneous Switches, explaining that neither currently exists as a data flag in the current process. LM presented a proposed approach whereby new Erroneous Switch reason codes will be added specifically for Microbusiness and Third-Party Intermediary cases, but will mirror existing ones, to support future regulatory requirements and improve reporting. LM explained that this approach was a simpler, and more practical approach, rather than introducing new data items in the CSS solution.

Workgroup members were broadly supportive of this proposed approach. LM confirmed it the approach would be revisited at the next meeting during discussions on the CSS solution.

6.2 MULTI LATERAL ERRONEOUS SWITCHES

LM noted that no data had been received from workgroup members on multilateral Erroneous Switches. LM confirmed that the CSS solution would likely be incompatible with multilateral resolution flows.

LM provided an overview of an alternative proposal whereby multilateral scenarios are excluded from the CSS Erroneous Switch process, and, instead, Energy Suppliers must agree the outcome manually before enacting the outcome via a normal Switch. Workgroup members supported this proposal, with LM confirming they would draft the detailed process.

6.3 CUSTOMER SERVICE RETURNERS

LM explained that Customer Service Returners are currently an allowed reason for using the Erroneous Switch process, but that they do not meet the definition of Erroneous Switches and that they do not incur GSoP obligations. LM confirmed that they had contacted all Energy Suppliers using this category but only two responded. However, neither of the respondents strongly supported keeping Customer Service Returners in place.

LM informed the workgroup that unless compelling justification on maintaining Customer Service Returners is received by 18 March 2026, the category will be removed as part of the subsequent Erroneous Switch Review Change Proposal.

7 DATE OF NEXT MEETING

The next meeting is scheduled 26 March 2026 (13:00 – 14:30).

8 NEW ACTIONS RAISED

Item	Responsible	Status
Publish updated Guidance Document, including domestic reason codes, escalation routes, and technical reason wording.	LM / JaH	To be published in the week following workgroup 6.
Draft Microbusiness and Third-Party Intermediary Erroneous Switch Reason Codes	LM	To be presented at workgroup 7.
Draft proposal on how PSR updates obtained during an Erroneous Switch supply period should be shared, factoring in consent requirements.	LM	Update to be provided at workgroup 7.
Evidence of Objections following an agreed ES to be shared and reviewed with REC Performance Assurance.	LM / BR	Ongoing. Update to be provided at a future workgroup meeting.