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I0237 WORKGROUP 6
MEETING NOTES

MEETING	**I0237 WORKGROUP 7**
DATE	**26 March 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 seventh I0237 Workgroup meeting. LM confirmed the session would be recorded solely to support production of meeting notes, consistent with previous meetings. No objections were raised.

2 CONFIRMATION OF AGENDA

The Chair presented the meeting agenda and invited members to raise any additional items of business, but none were proposed.

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. As this was to be the last meeting of the working group, LM confirmed that all actions were now closed or were included in the meeting 7 agenda.

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 (ES) Guidance Document.

LM confirmed that the updated ES Guidance Document had been re-issued following Meeting 6, incorporating a new high-level PSR section, clarified technical reason codes, an additional explanatory material, and noted that the PSR section remains intentionally high level due to GDPR constraints and ongoing industry discussions on consumer consent and data sharing.

No further comments on the Guidance Document were raised by attendees.

5 CHANGE PROPOSAL UPDATES

5.1 R0313 – ERRONEOUS SWITCH REVIEW: AMENDMENTS TO CLAUSE 4.5

LM provided a detailed update on REC Change Proposal R0313 – Erroneous Switch Review: Amendments to Clause 4.5 that had now be raised to reduce the ES initiation timeframe from 24 months to 12 months, as previously agreed within the working group.

LM confirmed that change had now been raised that the legal text is currently undergoing a legal review by REC Legal Advisors, with completion expected within approximately one week. LM confirmed that once the legal drafting has been finalised, the change will progress through Party Impact Assessment, consultation, and the standard governance process. The earliest possible implementation date is November 2026, subject to the outcomes of the Party impact assessment. Updates will be provided via the weekly REC Change Bulletin.

JoH and LM discussed Consumer protections for ES cases identified after 12 months, with LM confirming that REC Legal Advisors are still determining the appropriate safeguards. Potential options include enabling Energy Suppliers to resolve late ES cases bilaterally outside Schedule 30 or explicitly defining Energy Supplier obligations for informing Consumers of available resolutions. JoH emphasised that shortening the ES window must not diminish Consumers' ability to have legitimate ESs addressed.

The working group confirmed that they still supported the proposal to reduce the 24-month timeframe to 12 months. LM confirmed that additional Consumer protections for late identified ES cases will be developed with REC Legal Advisors and returned to industry for review during the change process.

5.2 DRAFT LEGAL TEXT UPDATES (NON-CSS, NEW CHANGE PROPOSAL)

LM provided an overview of the interim (non-CSS) legal text updates being drafted as part of a new REC Change Proposal ahead of the wider CSS solution that would be kept under REC Issue I0237. LM confirmed the new Change Proposal would include legal updates including aligning terminology including replacing "customer service returner" with "Consumer Service Returner" to match Schedule 1 definitions; harmonising gas and electricity reason code names and descriptions; reinstating the MRA-origin technical reason code definition to apply only to Related MPAN scenarios; clarifying Schedule 30 5.3 obligation on read deletion wording to prevent Energy Supplier misinterpretation; incorporating ES Flag rules directly into the legal text to support Performance Assurance monitoring; and correcting outdated data item references, including resolving inconsistencies between gas and electricity data items.

LM proposed adding the term "Domestic Consumer" to the rejection wording to prevent Losing Suppliers rejecting ES returns on the grounds of 'no valid contract' where a Domestic deemed

contract exists. One attendee sought clarity on whether this meant Non-Domestic cases could still be rejected under 'no valid contract' which LM confirmed. Another attendee queried scenarios involving premises that change type, and LM confirmed that outcomes depend on the contract in place at the point of the ES. The Working Group did not flag any concerns so the draft legal text will now be submitted and follow the REC Change Process. Updates will be provided via the weekly REC Change Bulletin.

6 CSS BASED SOLUTION

6.1 OVERVIEW

LM provided an overview of the CSS based ES solution. LM confirmed that the proposed CSS solution represents a fundamental redesign of the ES process. Under the new process, the processes followed by Gaining and Losing suppliers will be broadly aligned, with SLA timelines being the primary point of difference.

LM confirmed that the intention will be for the CSS to act as the central coordinator, validating MPIDs, dates, data consistency and the completion of flows. LM explained that the objection step will be removed for ES re-registrations to reduce process fallout and the ES Flag will be automatically set by the CSS rather than populated by Energy Suppliers. LM noted that a number of elements remain in early draft form and will continue to be refined with the Service Provider.

LM explained that it would likely be at least 18 months before the CSS solution could be implemented.

6.2 CSS PROCESS MAPS

LM provided attendees with a detailed walkthrough of the proposed CSS processes.

For Gaining Supplier initiated cases, the Gaining Supplier will investigate following Consumer contact and initiate the ES via CSS where an ES is confirmed. CSS will validate the MPID, apply the 12-month check (although LM noted that whether this is a hard stop or not remains a design question), and assess registration consistency before issuing the ES request to the Losing Supplier.

LM proposed potentially extending the Losing Supplier SLA from two to five Working Days, which attendees strongly supported due to operational risks and historic Objection-style gaming by Third Parties.

If the Losing Supplier does not respond within the SLA, CSS will automatically accept the ES and trigger the re-registration. LM also confirmed that the Additional Information field, highlighted by will be reinstated for consideration. One attendee raised concerns about misaligned timelines for agent appointment rebuilding following forced returns, which LM agreed to factor into the design.

LM confirmed that the Losing Supplier initiated process largely mirrors the Gaining Supplier process, but with two key differences in that the SLA for the Gaining supplier is expected to be

longer, potentially eight to ten Working Days, and the Gaining Supplier will retain the ability to amend the ES reason, reflecting the intent of the current process.

LM also identified the handling of pending Switches and Switches received mid process as an unresolved design challenge. Where re-registration is back to the original Energy Supplier, the process should be straightforward. However, where an in-flight Switch from a third Energy Supplier exists, the process becomes more complex. LM confirmed that this area remains open for further technical analysis.

6.3 MARKET MESSAGES

LM presented initial ideas for the Market Messages (MM) and confirmed that where possible existing MMs and Data Items will be used. LM also stated that current expectations are that these are likely to be Scenario Variants rather than individual MMs. LM asked the group to flag any missing MMs or Scenario Variants. None were highlighted. LM noted that the MMs will be developed further as part of the wider CSS solution.

LM presented suggested Data Items for the MMs, noting that these were the minimum requirements. LM flagged concerns about including address fields within CSS messaging. Electricity currently uses the MPL address, while gas uses a loosely defined address field, and introducing validation into CSS would significantly increase complexity. LM indicated a preference to remove address data unless there is strong justification. The working group did not provide a preference. LM also flagged concerns with the Additional Information field currently used on the D0301 / RET MMs due to the complexity of CSS validation. LM pointed out that SDEP could be used but noted it was not ideal. The CSS solution will look into options for sharing Additional Information.

LM asked the group to flag any missing Data Items. None were highlighted. LM noted that the Data Items will be developed further as part of the wider CSS solution.

6.4 DATA ITEMS, REASON CODES

LM presented initial drafts of the future ES reason codes, which are grouped into categories using a letter-plus-number structure. Provisional categories include Domestic, Microbusiness, TPI, and Non-microbusiness (I&C). One attendee questioned whether the inclusion of a microbusiness category adds unnecessary complexity due to inconsistent classification across Energy Suppliers. LM agreed that microbusiness classifications may be difficult to apply reliably but noted that TPI specific codes remain strongly justified.

On the technical reason code, LM confirmed it will be restricted strictly to related-MPAN scenarios, reflecting the original MRA definition. One attendee queried whether issues involving export meters or unsupported meter types would fall under this category. LM clarified that the export scenarios should be recorded as ‘incorrect MPAN’ rather than ‘technical’.

The group also discussed the distinction between ‘forgery proven’ and ‘suspected fraud’. LM reiterated that historically, ‘forgery proven’ required police involvement or legal proceedings, and Losing Suppliers may not have access to the necessary evidence. A potential option was explored whereby only the Gaining Supplier would be permitted to use the ‘forgery proven’ code.

LM then outlined early proposals for future rejection reasons, noting an intention to significantly simplify the current electricity process. Rejections would not be permitted solely because the Gaining Supplier disagrees with the ES reason, as they will retain the authority to amend it as part of their response to the ES initiation. The primary rejection reason under consideration is ‘no valid Non-Domestic contract’, although the precise wording will require further refinement. One attendee highlighted that expired contract terminology is too narrow, and LM confirmed that improvements to this wording will be made.

7 PERFORMANCE ASSURANCE

LM provided an update on Performance Assurance discussions with BR.

LM explained that the proposal presented is to move the existing ES reporting from aggregate-level reporting to full MPXN-level reporting. LM noted that this approach aligns with CSS, which already reports the ES Flag at MPXN level, and resolves issues with the current ElectraLink reports, as they do not have access to all Switching data. LM explained that MPXN-level data would also enable improved correlation checks with REL unmatched address records and strengthen monitoring of potential ES Flag misuse.

LM confirmed that the proposed approach will shortly be presented to RECCo. No objections were raised by the group.

8 NEXT STEPS

LM confirmed that the I0237 working group had now concluded and thanked all attendees for their engagement and support during the meetings.

LM confirmed that should the workgroup need to be stood up later in the change process, this would be communicated via the REC Weekly Change Bulletin.

LM reminded attendees of the three Change Proposals that have, or will be raised, to progress the outputs of the I0237 working group:

R0313 – Erroneous Switch Review: Amendments to Clause 4.5

The change will proceed through the standard change proposal route, including Party Impact Assessment and consultation, with the earliest possible implementation date being November 2026.

Legal Text Update (Non-CSS Solution)

A new Change Proposal will be raised shortly to deliver improvements ahead of the CSS solution, including:

- Alignment of terminology and definitions
- Updates to ES reason codes
- Inclusion of ES Flag rules directly within the legal drafting

LM confirmed it will proceed through the standard change proposal route.

CSS Solution (I0237)

Under the existing I0237, detailed technical design will commence with the CSS service provider. An extended Party Impact Assessment is anticipated due to the scale of change, and the earliest feasible implementation is currently estimated at approximately 18 months from approval. Additional working group sessions may be convened, or questions may be taken to the Change Issues Group as required,

LM reiterated that Energy Suppliers should continue to raise ES related issues through existing REC channels, including the REC Portal and via your Operational Account Manager (OAM).