RETAIL ENERGY CODE

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I0237 ERRONEOUS SWITCH REVIEW

MEETING MINUTES

DATE	**04 September 2025, 14:00**
LOCATION	**Microsoft Teams**

Attendee	Representing	Initials	Role
Lorna Mallon	REC Code Manager	LM	SME and Chair
Jonathan Hawkins	Retail Energy Code Company	JH	Director of Market Design
Holly Law	REC Code Manager	HL	Secretariat
Mica Thomas	REC Code Manager	MT	Change Analyst
Bailey Robb	REC Code Manager	RB	REC Performance Assurance
Micheal Sherry	Bryt Energy	MS	Working group member
Conor Adams	ScottishPower Energy Retail	CA	Working group member
Laide Adekanle	ScottishPower Energy Retail	LA	Working group member
Antonis Lamaj	100 Green	AL	Working group member
Azka Afzal	Eon Next	AA	Working group member
Catriona Ballard	Brook Green Supply	CB	Working group member
Christina Clifford	EDF Energy	CC	Working group member
Lisa Doris	SSE	LB	Working group member
Kieran McMahon	Octopus Energy	KM	Working group member
Leah Read	Valda Energy	LR	Working group member
Philip Roberts	DCC	PR	Working group member
Joanne Rush	SSE	JR	Working group member
Chris Sercombe	EDF Energy	CS	Working group member
Tom Hunter	Eon Next	TH	Working group member
Yasir Choudhry	Bryt Energy	YC	Working group member

1 INTRODUCTIONS & CONFIRMATION OF AGENDA

LM introduced herself as a Subject Matter Expert for the REC Code Manager, and as the Chair for this I0237 working group. Holly Law as the secretariat, Mica Thomas as the Lead Analyst, Bailey Robb from REC Performance Assurance and Jonathon Hawkins as RECCo sponsor.

LM confirmed the following agenda:

Agenda Overview

1. Welcome and Introductions
2. Terms of Reference
3. Background and Scope of Review
4. Data Overview and Rationale
5. Priority Topics Discussion
6. Questions and Feedback
7. Next Steps and Meeting Planning

2 TERMS OF REFERENCE

LM talked through the Terms of Reference for the working group and advised that they will be agreed by default unless objections raised.

No objections were raised.

3 INTRODUCTION TO I0237

LM explained why the Code Manager is doing a review of the Erroneous Switch process and why is has being done now and explained what is in and out of scope (slide 6 of the meeting papers).

4 DATA OVERVIEW AND RATIONALE

LM shared data that showed Erroneous Switches by reason (slide 7) and Erroneous Switched by reason and status (Slide 8) based on data provided by REC Performance Assurance.

5 PRIORITY TOPICS DISCUSSION

(Slides 10 - 14)

LM explained that she had made a start on the topics for discussion, with a suggested priority, but open to feedback and input from the working group.

2-year limit

LM asked the group if this is still a topic they wanted to look at and if they feel a two-year limit is too long?

MS replied that one of the issues with a two-year limit is if a transfer is allowed back and beyond fourteen months, there's no way of correcting the settlement. He also said that a D0300 cannot be raised beyond 12 months and that, once you get beyond fourteen months you cannot correct in the settlement. The second issue is the back billing rules as beyond 12 months you cannot back bill on domestic or micro-

business. Thirdly, is the is the debt position that it would leave the old supplier in when they re- register the site if the one-kilowatt advance is used, they are inheriting Energy that they need to recover.

JH said it's important to consider the MHHS impact here. And there's two aspects - one is the settlement window reduced to four months post migration, second is that there is an MHHS design decision that the one-kilowatt advance is going to be removed. So regardless of whether it's done in a week, two weeks, four months, there won't be a mechanism for suppliers to agree them in advance.

KM agreed that the two-year limit is too long, but that four month is not long enough.

LM agreed that this would be on the agenda for the next working group.

8 WD SLA

LM asked the working group for input on whether this should be reduced/ increased/ stay the same?

KM asked for clarity on if this is eight working days from the supplier finding out that there's an ET?

LM confirmed it's either eight working days to initiate or it's eight working days to respond.

KM said that eight working days to raise it, he thinks could potentially be lower

LM agreed that this one stays on the agenda and it will be a conversation of do we stay, do we come down or do we split it depending on if they're initiating or responding and she will bring it back to the next working group.

Rejection Reasons

LM raised that there is a lack of clarity and consistency in rejection reasons.

KM & LD supported clearer guidance, especially for non-domestic cases.

JH suggested separating domestic and non-domestic guidance.

LM confirmed will be brought back with draft examples and Ofgem input.

Erroneous Switch Flag Usage

LM stated that was evidence of the ES Flag used incorrectly, affecting data and objections.

LD noted improvement but misuse persists.

JH requested comparison data between switches and flagged ETs.

LM confirmed draft guidance/legal text to be proposed.

Multilateral ETs

LM asked if these are still happening, should they be included in the scope for I0237?

TH responded that he does still see them and agreed that they should be on the agenda.

LM confirmed this will be discussed at the next meeting.

Non-Domestic Gas Suppliers Not Using DTN

LM proposed reinstate list of such suppliers.

KM strongly supported; currently maintains own list.

Lorna confirmed will be discussed at future meeting.

Alternative Messaging Mechanisms

LM proposed CSS or other alternatives to the DTN flows for ES handling could be considered and that it would be explored in later workshops.

Contacting Consumers SLAs

KM asked to clarify this that the working group discussion would not impact GSOP?

LM confirmed that it would not.

LM agreed that this topic is parked for now and will be brought back to a future meeting.

Re-registration SLA

Both MS and LD said that they received objections received despite ET agreement and agreed this needs to looked at.

LM agreed that she will take an action to make a Performance Assurance recommendation to include something that looks at re-registration and Objections with the Erroneous Switch flag set.

ES Cancellation Process

LM explained that the ability to cancel an inflight ES was introduced under the REC and asked for feedback on how it was going.

KM said that it links to the previous one in that if an ET is accepted quickly and moved to re-registrations immediately after accepting, there will be no time to cancel.

Customer Service Returners

LM asked whether the working group thought that CSR should be treated as ET?

MS & CA both suggested CSR is not a true ET; needs clearer guidance.

MHHS Impacts

LM asked whether it would be useful to have discussions around Migration and settlement changes that may affect ET handling.

CA agreed it would be useful.

Clause 5.3

LM explained that Clause requiring deletion of meter reading history conflicts with settlement obligations so needs clarifying.

JH agreed that this needs re-visiting.

Supplier Refund SLA

LM explained no current SLA; open to review and that this is a lower priority but remains on list.

SDEP Process

LM noted that R0122 that is a Change Proposal to look at SDPE improvements is ongoing and asked the group whether they thought it was being used properly?

MS said that he thought it is a good system to use, so long as it's being used correctly and provides good control and a process for escalation.

JH noted it would be good to understand from people when it's discussed at a future meeting, what it is being used for outside of this or whether it is being used inaccurately.

KM said that he thinks there are others processes on SDPE outside ot ET's that are not working well, but generally for the ET process, it works well.

LD noted lack of responses from some suppliers.

Awareness of options available after SDEP

LM noted this will be discussed at a future working group.

Forgery/Fraud Proven & ET Reason Codes

LM explained that there is outdated definitions & inconsistent naming across fuels and asked the working group for their opinion on whether this is something that should be looked at?

KM & CA both agreed this should be in scope.

Prepayment Considerations

LM noted that will be a discussion for a future working group and asked the group if there any objections. None were raised.

Change of Occupier Flag

LM asked participants to monitor and report issues back to her or the Change Management team.

SoLR Supplier Process

LM talked about whether this needed to be an agreed process, with guidance and steps within the code and that it would be bought back to a future meeting.

Change of Supplier Readings

LM noted this had been covered in earlier topics, and this would be bought back to a future working group meeting. She expects it to be a considerable agenda item, as lots to discuss.

Withdrawals and Annulments

LM explained wanted to raise this one for awareness as these are the tow tools to help prevent Erroneous Switches in the first places and invited feedback.

Reporting and Assurance

LM explained there are reports that come from two different systems, the DTN and CSS and there are discrepancies between the two. She also pointed out that during this Issue and the subsequent working groups, any changes need to consider how they are going to be assured.

JH said that as well as the reporting side of things, a broader assurance strategy should be considered.

Timing Issues

LM talked about how Faster Switching complicates ES resolution in terms of timings.

AC asked a question around whether there is any way that of ECOES or Xoserve can have a flag for the ET period between the two suppliers or multiple suppliers?

LM agreed to add to list of topics for future consideration.

Housekeeping Changes

LM explained that there are Minor updates to Schedule 30 footnotes planned and plans to move them into the text and invited any other items of housekeeping changes for consideration.

Additional topic suggestions

LM agreed to add topics on the escalation list (and how it is updated), the use or need for a dedicated ES phone line and interactions with Ombudsman cases.

6 ANY OTHER BUSINESS

LM invited attendees to raise any other business and none were raised.

7 ACTIONS & NEXT STEPS

Item	Responsible	Due
Review and propose options for 2-year ET limit	Lorna Mallon	Next meeting
Draft SLA options (2-day, 8-day)	Lorna Mallon	Next meeting
Prepare guidance on rejection reasons	Lorna Mallon	Next meeting
Draft clarification on erroneous switch flag	Lorna Mallon	Next meeting
Draft clarification on multilateral Ess	Lorna Mallon	Next Meeting
Engage Ofgem on non-domestic rejection reasons	Lorna Mallon	Before next meeting
Performance Assurance recommendation to include something that looks at re-registration and objections with the erroneous switch flag set	Lorna Mallon	Next meeting
Review escalation list and contact update process	REC Team	Next meeting

LM confirmed items for the next meeting will be items 1, 2, 3, 4, 5 & 30 in the attached slide pack. Thanked attendees for their engagement and feedback. Participants encouraged to reach out via email (lorna.mallon@recmanager.co.uk or change.management@recmanager.co.uk) for further discussion or input.

8 DATE AND TIME OF NEXT MEETING

LM asked for suggestions of dates and times for the next meeting. The working group agreed to a 90-minute meeting on 9 October, time to be confirmed.