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I0237 WORKING GROUP 3

06 NOVEMBER 2025

AGENDA

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AGENDA ITEM	PRESENTER
Welcome and Introduction	Chair
Review minutes and actions of previous meeting	Chair
List of Non-Domestic gas only suppliers that do not use the DTN	Chair / All
Erroneous Switch reason descriptions • Current details • Historic details (pre-Schedule 30) • Suggested changes	Chair
Erroneous Switch reason codes	Chair / All
Supplier of Last Resort and in-flight Erroneous Switches	Chair / All
Any Other Business	All
Next Steps	Chair
Date and Time of Next Meeting	All

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REVIEW MINUTES AND ACTIONS OF PREVIOUS MEETING

I0237 ACTIONS LOG

Date action taken	Action Detail	Action Owner	Due	Action status
10/09/25	Update topics list following discussions	LM	09/10/25	Completed 09/10/25 - updated topic list published on I0237 area of REC Portal
10/09/25	Draw up agenda list as following discussions of topics	LM	09/10/25	Completed 09/10/25
10/09/25	Discuss options for Performance Assurance review of re-registrations and objections when ES flag set	LM	tbc	
09/10/25	Draw up guidance document on the use of ES flag	LM & JaH	06/11/25	Completed 30/10/25 – see initial draft Guidance document. It will be completed as WG continues
09/10/25	Review options for reducing Erroneous Switch time limit	LM & JaH	06/11/25	Ongoing – update to follow at December working group
09/10/25	Engage with Ofgem regarding rejection reasons	LM & JaH	06/11/25	Meeting scheduled for 03/11/25
09/10/25	Following Ofgem engagement, draft guidance note on ES rejection reasons	LM & JaH	06/11/25	
09/10/25	Review escalation process	LM & JaH	06/11/25	Ongoing – update to follow at December working group
09/10/25	Review possible proposals for multilateral ES and bring to future working group	LM & JaH	tbc	

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LIST OF NON-DOMESTIC GAS ONLY SUPPLIERS THAT DO NOT USE THE DTN

LIST OF NON-DOMESTIC GAS SUPPLIERS THAT DO NOT USE THE DTN

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What does the REC say?

- The ES process as set out in Schedule 30 is voluntary for Non-Domestic Gas Suppliers.

How does this work in practice?

- Non-Domestic Gas Suppliers can choose to use or not use the RET flow or to follow any other part of Schedule 30.
    - This includes for Domestic Consumers supplied via a Non-Domestic contract or those Erroneously Switched.

Is it an issue?

- Unclear if it is an issue and if it is what is the scale of the issue. DTN data required.
- Risk Gas Suppliers are sending RET flows that will never be received or answered. This may only be established following a SDEP escalation.
- Risk this is causing a Consumer detriment by adding delay.
- SPAA had a list of Non-Domestic Gas Suppliers that were signed up to the DTN which allowed all other Gas Suppliers to know who could and could not receive a RET flow.

What is needed to provide clarity?

- REC could place an obligation on Non-Domestic Gas Suppliers to confirm if they can receive a RET flow.
- Similar to REC contact lists, the onus would be on the individual Gas Suppliers to update their OAM if they changed anything related to the published information.

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ERRONEOUS SWITCH REASON DESCRIPTIONS

ERRONEOUS SWITCH REASON DESCRIPTIONS – CURRENT DETAILS

What does REC say?

The data items are listed as follows:

Electricity J1671	Gas B0029 / DI40212
A - Forgery - PROVEN	F - Fraudulent marketing practice (proven)
B - Misleading Information / Suspected Fraudulent Marketing Practice and / or Training Issues	M - Suspected misleading information, fraudulent practice (unproven) or training issues
C - Cancelled Contract Not Actioned	U - Failed/unprocessed contract cancellation by the New Supplier
D - Incorrect MPAN Selected	I - Incorrect MPRN selected by the New Supplier
E - Customer Service Returners	C - Goodwill Customer return
F - Technical Issues	n/a

There is no further information on the individual ES reasons in the REC.

DUAL FUEL ERRONEOUS SWITCHES BY REASON

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	Elec - Forger proven	Elec - misleading info / sales issues	DF - elec canx contractor , gas - customer return	Elec - incorrect MPAN	Elec - customer service returner	Elec - technical issue	Gas - incorrect MPRN	Gas - misleading info / sales issue	R	Gas – canx contract	(blank)	Grand Total
Mar 23 - Feb 24	103	286	510	2,370	280	359	1,532	117	50	186	26	5,819
Mar 24 - Feb 25	134	578	1,016	3,034	451	511	2,211	364	14	365	14	8,692
Mar-25	5	37	45	231	28	23	156	30	6	24		585
Apr-25	4	39	45	227	36	37	202	19	7	24	1	641
May-25	10	17	51	164	8	46	150	29	25	26		526
Jun-25	7	29	50	170	18	48	132	24	5	20		503
Grand Total	263	986	1,717	6,196	821	1,024	4,383	583	107	645	41	16,766

ELECTRICITY & GAS ERRONEOUS SWITCHES BY REASON AND STATUS

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Electricity Status	Forgery - proven	Misleading info	Canx not actioned	Incorrect MPAN	Customer Service Returner	Technical issue	I	(blank)	Grand Total
Accepted	143	460	408	3,234	418	351		10	5,024
Rejected	34	241	200	1,068	148	230	1	7	1,929
Unactioned	86	285	329	1,894	255	308		24	3,181
(blank)									
Grand Total	263	986	937	6,196	821	889	1	41	10,134

Gas Status	Fraud proven	Misleading info / sales issue	Canx not actioned	Incorrect MPRN	Customer returner		R	(blank)	Grand Total
Accepted	61	204	281	1,962	353		36		2,897
Rejected	25	93	101	518	98		10		845
Unactioned	49	286	263	1,902	329		61		2,890
(blank)									
Grand Total	135	583	645	4,382	780		107		6,632

ERRONEOUS SWITCH REASON DESCRIPTIONS – HISTORIC DETAILS- 1

What did the MRA / SPAA Transitional Schedules say?

Recorded Reason for ET	Definition	Typical Business Scenarios
Forgery - PROVEN	Where an ET is proven to be a result of the fraudulent marketing practices, by the gaining Electricity Supplier or its salesmen / agents.	• Forgery of contract. • Consumer was deceased at the point the contract was signed/agreed.
Incorrect MPAN/MPRN Selected	Where an ET is recorded in circumstances where the Consumer being transferred has been incorrectly identified.	• A house is split into a number of flats where the MPAN/MPRN for the wrong flat is selected. • Consumer provided incorrect data. • Wrong number keyed in. • Industry data incomplete or out of date. • New estates where plots are converted to postal addresses. • Incorrect data provided via Price Comparison Website.
Cancelled Contract Not Actioned	Where an ET is recorded because the gaining supplier failed to act upon the cancellation of the contract by the Consumer.	• Clerical Error. • If internal systems prove that the Consumer had previously contacted the supplier.
Misleading Information / Suspected Fraudulent Marketing Practice and / or Training Issues	Where an ET is recorded due the provision of misleading information by the gaining supplier or its salesmen/agents.	• Contract signed/agreed by a vulnerable customer who was unaware of the consequences of signing. • Consumer felt coerced into signing the contract by the sales agent against their better judgement. • Consumer has found out that savings quoted were not accurate and they do not want to proceed. • Consumer was unaware that they were signing/agreeing a contract and believed they were signing for more information.

ERRONEOUS SWITCH REASON DESCRIPTIONS – HISTORIC DETAILS - 2

What did the MRA / SPAA Transitional Schedules say?

Recorded Reason for ET	Definition	Typical Business Scenarios
Technical Issues	Where the ET process is used by Electricity Suppliers to correct a technical problem whilst at the same time enhancing customer service.	• Related MPAN
Consumer Service Returners	Where the ET process is used on a goodwill basis at the discretion of the Gaining Supplier in order to avoid a customer complaint, despite the Gaining Supplier holding a valid contract. An ET with a reason of Consumer Service Returners should only ever be initiated by the Gaining Supplier. Where a Consumer Service Returners ET is initiated by a Gaining Supplier, the Losing Supplier should endeavour to accept the request and re-register the Consumer.	• Consumer claims not to have signed but the Gaining Supplier has evidence to suggest otherwise. E.g. has a signed Direct Debit with the Consumer's bank details. • Consumer has changed mind and is adamant that they will not contact a supplier of their choice because it is too inconvenient. • Consumer has changed mind after they spoke to a rude customer service agent. • Consumer deceased after signing contract. • Consumer states they phoned up (or wrote or returned a form) to cancel before but there is no note on the system. The account is at a stage of registration where it cannot be stopped. • Consumer cancels one day after registration has commenced and insists that the supply letter was not received in time. • Consumer claims that they only signed for more information but the Gaining Supplier has evidence to suggest otherwise. E.g. it is found that the Gaining Supplier has a record of the customers DOB and bank details.

ERRONEOUS SWITCH REASON DESCRIPTIONS – SUGGESTED AMENDMENTS - 1

Suggested starting point for Reasons for Erroneous Switch and Definition

Dual Fuel Recorded Reason for ES	Which reason is used	Definition	Reasons for suggestion
Forgery - PROVEN	Electricity	Where an ES is proven to be a result of the fraudulent marketing practices, by the gaining Energy Supplier or its agents or third party.	Electricity name is shorter. Definition updated to current practices
Incorrect MPXN Selected	Updated	Where an ES is recorded in circumstances where the Consumer or property being transferred has been incorrectly selected.	Name updated to cover both fuels. Definition updated to provide greater clarity.
Cancelled Contract Not Actioned	Electricity	Where an ES is recorded because the gaining Energy Supplier failed to act upon the cancellation of the contract by the Consumer within the Cooling Off Period as set out in SLC 14A.	Electricity name is shorter. Added reference to the Cooling Off Period within the Supply Standard Licence Conditions (SLC)
Misleading Information / Suspected Fraudulent Marketing Practice and / or Training Issues	Electricity	Where an ES is recorded due the provision of misleading information by the gaining Energy Supplier or its agents or third party.	Electricity name is shorter. Definition updated to current practices

ERRONEOUS SWITCH REASON DESCRIPTIONS – SUGGESTED AMENDMENTS - 2

Suggested starting point for Reason for Erroneous Switch and Definition

Dual Fuel Recorded Reason for ES	Which reason is used	Definition	Reasons for suggestion
~~Technical Issues~~	~~E~~	~~Where the ET process is used by Electricity Suppliers to correct a technical problem whilst at the same time enhancing customer service.~~	Remove as was in place for split related MPANs only. As there the Related MPAN flag has been established for some time now this is no longer required
Goodwill Consumer Return	Updated	Where the ES process is used on a goodwill basis at the discretion of the Gaining Energy Supplier in order to avoid a customer complaint, despite the Gaining Energy Supplier holding a valid contract. An ES with a reason of Consumer Service Returners should only ever be initiated by the Gaining Energy Supplier. Where a Consumer Service Returners ES is initiated by a Gaining Energy Supplier, the Losing Energy Supplier should endeavour to accept the request and re-register the Consumer.	Could remove option as it is not an ES. Name updated to match REC drafting.

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ERRONEOUS SWITCH REASON CODES

ERRONEOUS SWITCH REASON CODES – CURRENT CODES

Elec code – J1671	Elec description	Gas Code – B0029	Gas description
A	Forgery -PROVEN	F	Fraudulent marketing practice (proven)
B	Misleading Information / Suspected Fraudulent Marketing Practice and / or Training Issues	M	Suspected misleading information, fraudulent practice (unproven) or training issues
C	Cancelled Contract Not Actioned	U	Failed/unprocessed contract cancellation by the New Supplier
D	Incorrect MPAN Selected	I	Incorrect MPRN selected by the New Supplier
E	Customer Service Returners	C	Goodwill Customer return
F	Technical Issues		

ERRONEOUS SWITCH REASON CODES – SUGGESTED CODES – OPTION 1

Dual Fuel code – J1671 & B0029	Dual Fuel description	Reason for Changes
G	Forgery - PROVEN	Changed from A as there is risk it could be selected in error as it is top of the list.
B	Misleading Information / Suspected Fraudulent Marketing Practice and / or Training Issues	Used electricity code as higher ES volumes
C	Cancelled Contract Not Actioned	Used electricity code as higher ES volumes
D	Incorrect MPXN Selected	Used electricity code as higher ES volumes
E	Goodwill Consumer Return	Used electricity code as higher ES volumes. Gas description used as highlights it is not an ES. Also updated to REC term
~~F~~	~~Technical Issues~~	Deleted as per suggestion above – if it is to remain recommend it is renamed to make it clearer

ERRONEOUS SWITCH REASON CODES – SUGGESTED CODES – OPTION 2

Dual Fuel code – J1671 & B0029	Dual Fuel description	Reason for Changes
Z	Incorrect MPXN Selected	Re-ordered putting ES reason used most frequently first. Used new lettering for all to start with clean set – note U is currently a gas code but it may not be required. Risk – putting Incorrect MPXN first could lead to an ES being incorrectly categorised.
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~~	

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SUPPLIER OF LAST RESORT AND IN-FLIGHT ERRONEOUS SWITCHES

SUPPLIER OF LAST RESORT AND IN-FLIGHT ERRONEOUS SWITCHES

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What can happen?

- An Energy Supplier can fail while an ES is still in progress.
- An Energy Supplier can fail before an ES is found.

Is it an issue?

- Very poor Consumer journey.
- Can take a long time to resolve and are unlikely to be resolved via the ES process.
- Some SoLRs keep staff to resolve inflight issues, but the focus is moving the portfolio at the time of the SoLR to the Energy Supplier appointed by Ofgem.
- Appointed SoLR Energy Supplier is unlikely to be aware an ES has occurred so can either gain in error or not gain at all.
- The other Energy Supplier is stuck with flows unanswered, limited chance of SDEP escalations being responded to.

What is needed to provide clarity?

- REC guidance could be drafted but is could be open to misinterpretation.
- Working group currently looking into SoLR process – could be handed over to them
- Any other suggestions?

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NEXT STEPS

REVIEW TOPICS FOR DISCUSSION FOR WORKING GROUP 4

Topic reference	Topic	Potential Quick win?
7	Alternative solutions to the DTN flows – for example a solution of using CSS rather than DTN	N
n/a	Review of data and discussions to date – if timing an issue this might be covered at the January 2026 working group meeting	N

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DATE AND TIME OF NEXT MEETING