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01	Proposal Plan
02	**Consultation**
03	Final Recommendation

CHANGE REPORT

R0280 – CSS CERTIFICATE AUTHORITY AUDIT CLARIFICATION

DOCUMENT VERSION	1.0
PROPOSED IMPLEMENTATION DATE	27 February 2026
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Performance Assurance Board	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	Medium	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Switching Operator, REC Code Manager (Performance Assurance)		

LEAD ANALYST (SOLUTION LEAD)	ASSURANCE LEAD	SUBJECT MATTER EXPERT
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OVERVIEW

The Central Switching Service (CSS) Certificate Authority Service Definition, Clause 9.1 states that the CSS Certificate Authority Service will be audited each year by a third party against an approved compliance standard and/or methodology. However, the clause does not state who initiates the audit (i.e., RECCo, the Code Manager, Switching Operator etc.) and engages with the third party.

CODE MANAGER MINDED TO POSITION

The Code Manager recommends that the Performance Assurance Board:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 27 February 2026.

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BACKGROUND

1 SUMMARY

The CSS Certificate Authority Service Definition, clause 9.1 states that the “CSS Certificate Authority Service shall be audited by a third party against an approved compliance standard or methodology on an annual basis”.

The clause however does not state who initiates the audit (RECCo, the Code Manager, or the Switching Operator) and engages with the third party. This Change Proposal seeks to clarify this clause and introduce a more efficient audit process that can be carried out on an annual basis.

RECCo, the REC Performance Assurance team and the Switching Operator have determined the Data Communications Company (DCC) (in their role as the Switching Operator) to be the responsible owner of the audit activities. During discussions, the Code Manager and the DCC have agreed the approved compliance standard as being tScheme S3A accreditation. The CSS Certificate Authority Service Definition document should be updated to reflect this agreed approach.

This issue was presented to the REC Performance Assurance Board (PAB) on 24 June 2025 as they are responsible for decisions relating to the proportionality of information security requirements for REC Service Users and the two REC Service Providers in the Code: RECCo Board and the DCC. The DCC submitted evidence as part of the six-monthly ‘Deep Dives’ as captured within the Performance Assurance Operating Plan (PAOP). Different options were considered before deciding on the tScheme S3A Assessment as this standard would cover both the CSS Certificate Authority and the core CSS Service, and was the preferred approach by the CSS Provider. At the meeting, PAB approved this technique to be used in carrying out the audit on an annual basis, and the raising of this change. The minutes for the meeting can be found here.

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2 PROBLEM STATEMENT

Section 9 of the CSS Certificate Authority Service Definition document mandates an annual third-party audit of the CSS Certificate Authority Service against an approved compliance standard or methodology. However, it does not specify the audit technique or methodology to be used, nor does it specify who is responsible for initiating the audit and engaging with the third-party.

3 IMPACTS

REC SERVICE PROVIDERS	RECCO / REC CODE MANAGER	REC DOCUMENTS / PRODUCTS
Switching Operator	REC Performance Assurance	CSS Certificate Authority Definition

MHHS
This Change Proposal has no impacts on MHHS.

Although the REC Baseline Statement designates the Technical Expert Panel as the Responsible Committee for approving changes to the CSS Certificate Authority Service Definition document, the Code Manager recommends that the PAB be confirmed the Responsible Committee for this Change Proposal as the PAB is responsible for decisions relating to the proportionality of information security requirements for REC Service Users and the two REC Service Providers in the Code: RECCo Board and the DCC.

4 CROSS-CODE IMPACTS

There are no cross-code impacts identified with this Change Proposal.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**09 Sept-25**	**24 Oct-25**
	Code Manager Initial Assessment	September	September
	Solution Development	September	September
	Legal Review	September	October
	Business Case Assessment	September	October
Change Proposal		**25 Oct-25**	**24 Nov-25**
	Consultation	October	November
	Solution Refinement	November	November
	Final Determination	November	November
Voting		**30 Dec-25**	**30 Dec-25**
	Appeal Window	31 December	14 January

The Code Manager is proposing that this Change Proposal proceeds straight to consultation as there is minimal impact to Parties and is only providing clarity on the Switching Operator's obligations as well as provide guidance over the audit process. The REC Performance

Assurance team have also confirmed the solution will be incorporated into their ongoing PAB Secretariat and Service Provider assurance work.

6 STAKEHOLDER ENGAGEMENT

REC Performance Assurance engaged with the DCC in February 2025 to assess CSS adherence to the security requirement in the Service Definition document. During this review, it was determined that there was ambiguity in the CSS Certificate Authority Service Definition regarding the ownership of the audit activities, timescale of the audit and the approved compliance standard.

This finding led to discussions between RECCo, REC Performance Assurance and the DCC (in their role as the Switching Operator), and it was determined that the Switching Operator is the responsible owner of the audit activities. A REC Change was thus required to reflect this agreed approach.

As part of the assessment of the audit activities, the Code Manager and the DCC also explored the available compliance standard options and presented these options to PAB on 24 June 2025. The PAB supported the Code Manager's recommendation to approve the tScheme S3A Assessment as the technique to be used in carrying out the audit of the CSS Certificate Authority and core CSS service on an annual basis, and that a change to the Code should be raised to enable this to be a requirement.

The minutes from this PAB meeting are available here.

7 PRIORITY STATUS AND URGENCY

PRIORITISATION MATRIX

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Indirect	1	27	27
	Retail Markets Impact	Innovation and Market Arrangements	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	2	7	13
		Legal and Regulatory Compliance	2	14	28
Resource	Complexity / Effort / Duration		3	9	28
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		1		8
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	1	10	10
				Overall Priority Score (rounded)	139

Priority Status	MEDIUM
Change Proposal Type	STANDARD

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SOLUTION

8 PROPOSED SOLUTION

The proposed solution is to amend the legal text of the REC CSS Certificate Authority Definition document to clarify that the Switching Operator is responsible for the audit process and that it is to be conducted on an annual basis. Clause 9.1 will be amended to say:

> *The Switching Operator shall ensure the CSS Certificate Authority Service is audited on an annual basis by a third party against an approved compliance standard or methodology to be approved by the PAB.*

The Code Manager is investigating whether a further Category 3 guidance document is required, which would not form part of this Change Proposal but could be implemented alongside if one is required.

PRELIMINARY ASSESSMENT

9 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

There are no risks, assumptions, issues or dependencies identified for this Change Proposal.

10 BUSINESS CASE ASSESSMENT

10.1 COSTS

There are no costs associated with this Change Proposal.

10.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
IMPROVED CLARITY ON THE CSS CERTIFICATE AUTHORITY AUDIT PROCESS AND THE SWITCHING OPERATOR'S OBLIGATIONS	The implementation of this Change Proposal will remove ambiguity within the CSS Certificate Authority Service Definition document on the audit process. Currently, the Code requires the service to be audited each year by a third party against an approved compliance standard and/or methodology. However, the Code does not state who initiates the audit and engages with the third party, nor does it specify the "approved compliance standard and/or methodology". This Change Proposal will provide clarity that the Switching Operator is responsible for initiating the audit and engaging with the third party. The associated Category 3 guidance document will outline the approved compliance standard (the tScheme S3A assessment) and provide guidance to the DCC on the process and escalation process.
MORE EFFICIENT AUDIT PROCESS	The implementation of this Change Proposal should provide for a more efficient audit process which can be carried out on an annual

	basis. The current audit arrangements do not require assurance of the core CSS application, which is a key priority area for the REC's Performance Assurance. This Change Proposal will allow for the DCC to conduct the audit process in a timely manner and according to a robust, approved compliance standard.

10.3 COST BENEFIT ANALYSIS

There are no central systems costs, no expected costs to Parties and two intangible benefits associated with this Change Proposal. As such, the Code Manager believes that there is positive case for change.

11 CASE FOR CHANGE

SELF GOVERNANCE

The Code Manager considers there is a positive case for change for implementing this Change Proposal on the basis that the proposed solution:

- Is both viable and implementable, and effectively resolves the problem statement;
- Has no associated central system costs and no associated Party costs;
- Has proportionate effort required for implementation;
- Will remove ambiguity within the REC's CSS Certificate Authority Service Definition document on the audit process;
- Will provide clarity on the Switching Operator's obligations in relation to the audit process; and
- Should allow for a more efficient audit process which can be carried out on an annual basis.

12 APPENDIX

CHANGE PROPOSAL	Link

13 GLOSSARY

TERM	DEFINITION
Category 3 Product	refers to the operational documents and RECCo guidance which are required to support, but do not place obligations upon, market participants and as such will be maintained by the Responsible Provider.
Central Switching Service (CSS)	means the Systems and processes provided or procured by the CSS Provider for the purpose of providing the Address Management Service and the Registration Service.
CSS Certificate Authority	means the CSS Provider in its role as security certificate authority for the Central Switching Service.
CSS Certificate Authority Service	means the service provided by the CSS Certificate Authority, that is internally administered within Switching Portal.
CSS Provider	means the DCC when performing functions under or in relation to this Code (but always excluding its functions under the Smart Energy Code and its roles as CSS Systems Integrator, SI Provider and Switching Operator), including in respect of the Central Switching Service and including in effecting the design, build and testing of any System that will allow it to perform functions under this Code after the CSS Go-Live Date. This role is the CSS Procurer and Manager function as described in the E2E Data Migration Plan, E2E Integration Plan, E2E Post Implementation Plan, E2E Testing Plan, E2E Transition Plan: Implementation Approach and E2E Transition Plan: In-Flight Switches Approach.
Performance Assurance	means the activities undertaken by the Code Manager and the REC PAB in accordance with the Performance Assurance Schedule.
Performance Assurance Operating Plan (PAOP)	means the plan of that name approved by the REC PAB, as described in the Performance Assurance Schedule.
Switching Operator	means the DCC in performing the role of managing the co-ordination of the CSS Provider and the other Switching Data Service Providers, including the mechanisms for CSS Users to report incidents and access service management support, from the CSS Go-Live Date.