RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0322 – ERRONEOUS SWITCH REVIEW: I0237 CLARIFICATIONS

On 26/06/2026, the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for R0322.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Flo Monea

DATE IMPACT ASSESSMENT ISSUED	26/06/2026
RESPONSE DEADLINE	17/07/2026

Question 1:	Did you attend the I0237 working group?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Representatives from the business did attend the working group	Noted
SSE Energy Supply Limited (Energy Supplier)	Yes, SSE was represented at the I0237 working group.	Noted

Question 2:	Do you have any comments on the proposed solution and legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Centrica supports the proposed solution and legal text and agrees that the amendments provide valuable clarification and improved consistency across the Erroneous Switch arrangements.	Noted, thank you for your comments
SSE Energy Supply Limited (Energy Supplier)	We have no issues with the proposed solution and legal text.	Noted, thank you for your comments

Question 3:	Do you think we have identified and considered all processes and scenarios that may be impacted through the implementation of the proposed change? If not, please provide details on any additional clarifications, or changes that should be included in this Change Proposal.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes	Noted
SSE Energy Supply Limited (Energy Supplier)	At this stage, we feel all processes and scenarios have been identified.	Noted, thank you for your comments

Question 4:	Will the proposed data flow clarifications and associated data item amendments for electricity have any impacts on your organisation's existing systems or processes? If so, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Having reviewed the proposal, we do not currently foresee any impacts on our systems, processes, or operational activities.	Noted, thank you for your comments
SSE Energy Supply Limited (Energy Supplier)	We will have to update our current work processes and will likely need to undertake some system configuration work.	Noted, thank you for your comments

Question 5:	Will the proposed data flow clarifications and associated data item amendments for gas have any impacts on your organisation's existing systems or processes? If so, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Having reviewed the proposal, we do not currently foresee any impacts on our systems, processes, or operational activities.	Noted, thank you for your comments
SSE Energy Supply Limited (Energy Supplier)	No impact on our systems or processes.	Noted, thank you for your comments

Question 6:	Under R0313, there is a proposal for the Code Manager to correct a typographical error in the DI40213 – Status Response RET Data Item. The current description for enumeration value T states, “Not accepted because transfer took place more than 4 months before initiation of returned request.” This is inaccurate and inconsistent with the existing Erroneous Switch framework, under which the applicable period is 24 months. Do you believe this should be included in the R0322 change proposal instead? Please provide rationale.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	We agree that the correction to DI40213 should be included within R0322. As the issue relates to an identified drafting error within the Erroneous Switch arrangements, it is appropriate and efficient to address it alongside the broader package of clarifications and corrections proposed under R0322. This would ensure consistency across the framework and avoid the need for a separate change to rectify what appears to be a typographical error.	Noted, thank you for your comments
SSE Energy Supply Limited (Energy Supplier)	If this error can be corrected as part of this change without losing the main aim of the change request, then we are in favour of the update.	Noted, thank you for your comments

Question 7:	R0322 is targeting implementation for November 2026. If your organisation would require a further lead time, please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	We support the implantation date of November 2026	Noted, thank you for your comments
SSE Energy Supply Limited (Energy Supplier)	As this is a process update with minor system configuration, there is no reason this change cannot be implemented for November 2026.	Noted, thank you for your comments

Question 8:	Are you aware of any constraints on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	No. We are not currently aware of any constraints that would impact the delivery of this change. Based on our current understanding, no issues have been identified relating to our systems, processes, or implementation timelines.	Noted, thank you for your comments
SSE Energy Supply Limited (Energy Supplier)	No.	Noted, thank you for your comments

Question 9:	Would implementing the proposed solution incur any costs to your business? If so, please provide details breaking down design/build/test costs and on-going costs. If preferable, please indicate which of the below ranges your costs may fall: A) Nil; B) Up to £9,999; C) Between £10,000 and £49,999; D) Between £50,000 and £99,999; or E) more than £100,000.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	A) Nil	Noted
SSE Energy Supply Limited (Energy Supplier)	B) Up to £9,999	Noted

Question 10:	Taking into consideration both the costs and the benefits seen, do you consider this change should be made?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes	Noted
SSE Energy Supply Limited (Energy Supplier)	SSE feels this change has minimal costs and the clarifications will be a benefit to the switching process.	Noted

Question 11:	Do you believe the solution appropriately accounts for the industry's move to the new MHHS arrangements whilst the industry manages both MHHS and non-MHHS Metering Points?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Yes	Noted
SSE Energy Supply Limited (Energy Supplier)	Yes.	NOted

Question 12:	Do you foresee any risks to your qualification or migration plans to be delivered as part of MHHS implementation caused by the delivery of this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	Based on our current assessment, we do not foresee any risks to the delivery of our MHHS qualification or migration activities arising from this change.	Noted, thank you for your comments
SSE Energy Supply Limited (Energy Supplier)	As this is a process change it should have no MHHS migration impacts on us.	Noted, thank you for your comments

Question 13:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Centrica (Energy Supplier)	No further comments	
SSE Energy Supply Limited (Energy Supplier)	No other comments.	