MEETING MINUTES

MEETING	**RECPAB_25_0616**
DATE	**16 June, 4:00 pm**
LOCATION	**Virtual Teams**

Attendee	Representing	Initials	Role
Jon Dixon	RECCo	JD	PAB Chair
Dorcas Batstone	Independent Member	DBa	PAB Member
Steve Arthur	Independent Member	SA	PAB Member
Steve Verdon	Independent Member	SV	PAB Member
Angela Joyce	Supplier Representative	AJo	PAB Member
Paul Saker	Supplier Representative	PS	PAB Member
David Brown	MEM Representative	DBr	PAB Member
Fungai Madzivadondo	DNO Representative	FM	PAB Member
Anne Jackson	UNC Representative	AJa	PAB Member
Beth Procter	SECCo Representative	BP	PAB Member
Faye Brookes Lewis	Citizens Advice Representative	FBL	PAB Member
Cristina Ullastre	Ofgem Representative	CU	Observer
Anton Moden	Code Manager	AM	Performance Assurance Lead
Walter Carlton	Code Manager	WC	Performance Assurance Partner
Vaishnavi Campbell-Sharma	Code Manager	VCS	Performance Assurance Manager (acting as PAB Secretary)
Anna Weeks	RECCo	AWe	Observer
Mollie DeCamp	RECCo	MDC	Observer
Glenn Sheern	Code Manager	GS	Change Team Representative
Caroline Freimuller	Code Manager	CF	Change Team Representative
Patrick Cassels	SSEN Representative	PC	Party Representative
Tim Porter	SSEN Representative	TP	Party Representative

1. CLARIFICATORY ESCALATION TO RESOLVE MISALIGNMENT BETWEEN THE CENTRAL SWITCHING SERVICE (CSS) AND THE ELECTRCITY RETAIL DATA SERVICE (ERDS)

The Chair welcomed attendees to the extraordinary meeting of the PAB to discuss the clarificatory escalation regarding the registration data misalignment between the CSS and an ERDS system impacting approximately 1000 consumers. The goal for today is determine the right way forward

rather than to advocate for any particular position. The PAB Chair thanked PAB Members for making themselves available at short notice.

The PAB Chair took the paper as read and opened the floor for questions, whilst clarifying that while two options have been identified as presented in the paper, he would be open any additional recommendations from PAB Members. The PAB Chair emphasised the need for quick resolution on this matter as it would be unacceptable to allow this situation to perpetuate given the potential consumer impact.

The SSEN representative introduced himself as the Head of Regulation and Commercial Operations team at SSEN. They noted that SSEN did not have sufficient opportunity to respond to the paper presented to PAB and flagged factual errors and omissions within the timeline. They stated that the defaulting Supplier's ability to register customers was suspended by SSEN in line with the DCUSA and SSEN had to pass this information to CSS. They stated what this looks like in practice is not clear and therefore a clarificatory change has been raised under the DCUSA which SSEN support. The SSEN representative highlighted that SSEN had notified the DCUSA Panel, their REC OAM and REC Performance Assurance of their intent to enact the regulatory alliance termination. The SSEN representative also clarified that as the process was unclear, they contacted their REC OAM and acted on their guidance.

The PAB Chair noted SSEN's update and clarified the PAB are here to determine what happened between the initial notification to CSS in January and the withdrawal of alliance being given effect on 11 April.

The PAB Chair acknowledged the condensed timescales to accommodate the extraordinary PAB. The PAB Chair clarified that if PAB Members determined they required further information, they had the option to request that rather than vote for one of the two options presented within the paper.

The Code Manager acknowledged SSEN had proactively communicated throughout the process and that DCC and SSEN collaborated to investigate and understand what had occurred. They stated that both options put forward are complex and create additional demands on one or more organisations for resolution. They also clarified the process has worked as it is set out within the REC which allows for the completion of in-flight switches. The PAB Chair acknowledged there is a need for a REC Change to remove ambiguity within the Code for this process.

An Independent PAB Member queried whether Ofgem's notification on the Provisional Order has any bearing on the decision put forward to PAB today. The Code Manager clarified that on 13 June 2025 Ofgem published its notice of proposal to confirm the Provisional Order (PO) and is currently inviting any representations or objections to their intention of confirming the PO. The Code Manager also clarified that CSS design is not to block all in-flight switch requests on termination of an alliance. SSEN confirmed MPRS design did not block those in-flight switches. The PAB Chair noted Ofgem's intention to not allow retrospective suspensions and to allow in-flight switches to complete, inviting comments from the Ofgem representative at PAB.

The UNC Representative enquired what the status of information shared with the consumer is. The Code Manager clarified that when the Supplier receives the CSS registration confirmation, it informs the consumer. Therefore, consumers in these instances believe they are registered with the incoming Supplier here. The SSEN representative added that some consumers have contacted them and SSEN have informed the consumers they are working with the Supplier to rectify the situation, but the Switch should not have gone through. The SSEN representative explained the DCUSA process which allows them to place a restriction on Parties who are not paying their Distribution Use of System charges, indicating that this Supplier had owed SSEN over £1 million in unpaid bills.

The SSEN representative explained that a small number of customers wanting to switch away from this Supplier are contacting the DNO as they are being prevented because of the CSS-MPRS misalignment. The Code Manager raised the concern that these customers may have been billed by the incoming Supplier. If these switches are reverted to the previous Supplier, these consumers may not be accepted back at their previous tariff and would not be covered by the Supplier of Last Resort (SoLR) safeguards for any monies they are owed back by the incoming Supplier.

A PAB Member queried if other ERDS providers are similarly impacted. SSEN representative informed PAB that another ERDS provider had raised the DCUSA modification implying they were taking similar action. However, they believed they are the first ERDS provider to have used this process since CSS go-live. The Code Manager informed PAB they were not aware of any other ERDS provider revoking their Regulatory Alliance via CSS.

An Independent PAB Member sought clarification where the paper states there are no bases within the Code to justify option 2. The Code Manager clarified that they had not been able to corroborate SSEN's assertions in their interpretation of the REC, as they could not identify REC or DCUSA clauses that explicitly allowed the approach followed by SSEN. The sections identified as relevant had been included in the PAB paper.

The Citizens Advice representative stated they were concerned that there may be significant financial detriment for the consumer if PAB voted for Option 2. The Code Manager acknowledged there are risks with both options as stated within the paper, which we are concerned about but cannot properly quantify at this point.

The PAB Chair invited views from PAB Members whether they had sufficient information to make a decision.

The DNO Representative declared an interest and acknowledged other DNOs have highlighted need for further clarification for this process.

The SSEN representative stated though they have a financial interest, they will support any outcome determined by the PAB to minimise consumer detriment.

A PAB Member queried who informs the consumer of what the issue and implications are whilst acknowledging it may be beyond the remit of this PAB discussion. The PAB Chair acknowledged that action should probably fall to the Supplier, but the impacted customer may not be aware they are with

the Supplier who is contacting them. The PAB Chair further stated that there is no firm view from Ofgem on either option, and invited comment from the Ofgem representative present at the meeting. The Ofgem Representative explained they cannot provide a view right now but would speak to their colleagues and revert in due course.

The UNC Representative queried what legal implications may occur following PAB's decision. The Code Manager clarified irrespective of the decision, it is for RECCo and the Code Manager to facilitate the resolution.

The PAB Chair moved a vote on the options presented, with 7 PAB Members voting for Option 1 and 1 PAB Member voting for Option 2.

PAB recognised the need to quickly correct this as well as quickly ensure Code changes are progressed to prevent these issues in future. The Code Manager acknowledged this and so explained that the REC Change Representatives had been invited to this session to hear first-hand the views of the PAB.

The SSEN representative acknowledged the PAB outcome and endorse support to facilitate the resolution. They reiterated that they felt the paper presented to PAB was not the full and accurate record and requested for it to be reflected in the minutes. The Code Manager recognised either solution will likely have financial implications, and offered to work with SSEN to revise the paper presented to PAB with additional facts and clarifications SSEN wishes to present. A PAB Member requested for the information about the costs associated with remediation for both options to be included within any revised paper. PAB approved that SSEN and the Code Manager may submit a late paper with revisions ahead of the June PAB meeting. The SSEN Representative stated that due to availability of key staff the earliest they will be able to respond is 23 June.

The SSEN Representative also highlighted that the ERDS's ability to suspend services under the DCUSA should not be undermined as a result of this decision.

PAB Members:

- **NOTED** the paper provided by the Code Manager and representations made by SSEN.
- **APPROVED** Option 1 presented within the RECPAB_25_1606_01 as the method of remediation of the misalignment between CSS and ERDS.
- **AGREED** that a revised paper may be brought as a late paper to the June PAB should there be clarifications to the content of the paper.

NEXT MEETING DATE

The next meeting of the PAB will be held online on 24 June 2025.