RETAIL ENERGY CODE

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I0237 - TECHNICAL CHANGE WORKSHOP 4
MEETING NOTES AND AGREED POSITIONS

MEETING	**I0237 Technical Change Workshop 4**
DATE	**25 August 2026 (10:30 – 12:30)**
LOCATION	**Microsoft Teams**
PURPOSE	**Confirm the preferred messaging approach, review the proposed message payloads and identify how the remaining Data Item and enumeration questions should be taken forward.**

ATTENDEES

Full attendee list available on request.

KEY OUTCOMES

TOPIC	TCW #4 OUTCOME
Message sequencing	Sequential messaging was the clear preferred design direction. This remains a design assumption until confirmed through formal impact assessment.
Process terminology	**Initiation**, **Determination** and **Response** were accepted as suitable stage names, provided they are clearly defined in the Retail Energy Code (REC).
Supplier terminology	The preferred direction is to use Erroneous Switch (ES)-specific **Gaining Supplier** and **Losing Supplier** terminology, with suitable wording or prefixes to avoid confusion with the direction of the corrective registration. The final approach must be tested through impact assessment.
Response Service Level Agreements	The proposed response Service Level Agreements (SLAs) of **five Working Days** and **eight Working Days**, depending on which Supplier initiates the ES, were supported by the majority. One participant considered eight Working Days too short and suggested ten Working Days. This is to be confirmed through formal Impact Assessment.
Final ES Response	Where an ES is accepted, the design assumption is that the Central Switching Service (CSS) will send an ES Response to both Suppliers, including the new Supply Start Date (SSD).
Future Supply Start Date	Only the Supplier gaining the Meter Point Administration Number or Meter Point Reference Number back should set the number of Working Days to the new SSD. **Five Working Days** was accepted as the maximum. The minimum and default require clearer timeline examples before final confirmation. Code Managers will share this with members at a future TCW to gain the groups' views on this.
Address information	Parsed Retail Energy Location (REL)-style address components were preferred. The address would be provided to support Supplier validation but should not be updated during the process. CSS will not validate the address.
Reason for Return – Enumeration Values	The preferred approach is to use the Domestic Premises Indicator already held in the Central Switching Service and retain Reason for Return values A to E, rather than separate duplicated values for domestic, microbusiness and Third Party Intermediary cases. Technical Issue should remain as an electricity-specific reason for split or incorrectly related Meter Point Administration Numbers.
Reason for Rejection – Enumeration Values	Rejection reasons should be simplified. For a domestic premises, the Supplier that previously supplied the premises and would regain it following an accepted Erroneous Switch should not be able to reject the return. The Supplier currently registered following the erroneous switch should use a single valid-contract rejection reason, supported by Additional Information. The non-domestic position requires further legal-text development.

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1 MARKET MESSAGE SEQUENCING AND MARKET MESSAGE NAMING CONVENTIONS

The TCW compared a sequential model, using distinct messages for Initiation, Determination and Response, with a linear model that progresses one Market Message through each stage. Both models deliver the same end-to-end business process. The difference is how CSS orchestrates and validates the messages.

Members noted that a linear model is technically feasible, but it is not how CSS messaging currently operates. CM explained that a sequential model provides clearer message purpose, state progression, recovery, audit and reconciliation. It is also closer to the design basis used for R0096. A formal Service Provider Impact Assessment is still needed to confirm technical complexity and future extensibility.

A TCW poll recorded five of six responses in favour of sequential messaging. The remaining response indicated no strong preference between the two approaches. No objection was raised to taking sequential messaging forward as the preferred design assumption.

CM asked members to confirm their preference for terminology used with the ES progression stages. These were:

- Initiation
- Determination
- Response

Members agreed in the TCW that these terms should be used and that these would be the defined terms used within the REC, CSS and EMDS.

WORKSHOP POSITION	POINTS TO CONFIRM	NEXT STEP
Sequential messaging will be taken forward as the preferred design assumption.	Confirm the technical complexity, interaction with R0096 and whether the approach can support future development. The final design remains subject to formal impact assessment and the relevant Retail Energy Code (REC) governance.	CM will update the process design and include the preferred sequencing approach in the Service Provider Impact Assessment.
Initiation, Determination and Response will be used as the working terms for the three stages of the Erroneous Switch process.	Confirm that the terms can be clearly and consistently defined across the REC, Central Switching Service (CSS) design and Energy Market Data Specification.	The Code Manager will apply the terms consistently across the process design, technical requirements and relevant legal text.

2 SUPPLIER TERMINOLOGY

CM explained that the current process moves between Initiating or Associated Supplier and Gaining or Losing Supplier. This is difficult to follow because the historic process looks back at the error, whereas CSS and re-registration look forward to who will gain or lose the supply.

Members confirmed their preference was to move towards Gaining Supplier and Losing Supplier. A representative from the CSS System Operator (CSS SO) suggested the option of using an ES-specific prefix or equivalent wording so that the role in the ES process is clear, and it is possible to differentiate

from a regular switch. It was suggested that this pre-fix could be added the losing/gaining supplier MPID data item, thus involving the creation of new data items. The terminology must also work for more complex cases, such as when more than one supplier is involved, and should not be treated as finalised until it has been tested through formal impact assessment.

A workshop poll recorded six of eight responses in favour of moving to Gaining Supplier and Losing Supplier terminology, with two responses in favour of retaining the current terms.

WORKSHOP POSITION	POINTS TO CONFIRM	NEXT STEP
Develop Erroneous Switch-specific Gaining Supplier and Losing Supplier terminology, supported by the relevant Market Participant Identifier data items using a pre-fix.	The precise prefix, definitions and use of existing or new Data Items require formal impact assessment and legal-text review.	The Code Manager will develop the terminology and confirm the resulting payload, legal-text and supplier-training changes.

3 RESPONSE SERVICE LEVEL AGREEMENTS AND FINAL ERRONEOUS SWITCH RESPONSE

CM explained that the proposed arrangement is five Working Days for the Supplier that lost the supply in error and eight Working Days for the Supplier that gained the supply in error. If no response is received within the applicable SLA, CSS will auto-accept the ES. The values are expected to be configurable.

The majority of members supported the proposal of the Losing Supplier having five WDs and the Gaining Supplier having eight WDs. One participant considered eight Working Days too short and suggested ten. CM caveated that the supporting data presented on percentages of suppliers that hit the SLAs is not current and does not fully cover non-domestic gas, so this question will be included in impact assessment.

When asked about the ES response, members acknowledged and agreed with the approach that once an ES is accepted, CSS should send a final ES Response to both Suppliers. This closes the ES process and confirms the new SSD. The same response should be sent following auto-acceptance, so both Suppliers know the outcome and the planned re-registration date.

WORKSHOP POSITION	POINTS TO CONFIRM	NEXT STEP
Take forward proposed response periods of five and eight Working Days, depending on which Supplier initiates the Erroneous Switch.	The eight versus ten-Working-Day position remains a specific impact-assessment question. The supporting data should be refreshed where possible, including the non-domestic gas position.	The Code Manager will include the response-period question in the Party and Service Provider Impact Assessments and provide more up to date data on percentage of SLAs met.
CSS will send the accepted ES Response to both Suppliers and include the new SSD.	The precise payload should remain limited to the information needed to confirm the outcome and SSD.	The Code Manager will reflect the final Erroneous Switch Response in the message design and relevant legal text.

4 MESSAGE PAYLOADS

The payload review presented by CM was intended to confirm that the design captured during previous TCW discussions, rather than reopen every Data Item. No objections were raised.

Key points were:

- The number of Working Days to the new SSD is only available to the Supplier that will gain the supply back.
- The ES Determination uses a mandatory true or false response indicator. A rejection reason is conditional on rejection.
- The accepted ES Response to both Suppliers is deliberately short and focused on the outcome and SSD.
- Consumer Name and Consumer Email Address are passed to the other Supplier. CSS does not validate them. Data security, storage and retention requirements must be dealt with in the detailed design.
- The Working Day update rules shown in the slides required updating. CM will correct the yes or no update indicators and reissue the slides.

WORKSHOP POSITION	POINTS TO CONFIRM	NEXT STEP
The proposed message payloads were broadly confirmed, subject to correcting the population and update rules for the number of Working Days to the new Supply Start Date.	Confirm which Supplier provides the number of Working Days, at which stage the value is provided and when it becomes fixed. The security, storage and retention requirements for consumer information also require detailed design.	CM will correct and reissue the message payload slides and confirm the data-handling requirements with the Central Switching Service provider.

5 FUTURE SUPPLY START DATE

CM explained that this data item had been discussed in TCW#3, but that the SLAs attached to this were yet to be confirmed. It was agreed that the Supplier gaining the supply back should be the only party able to select the notice period. Members supported a maximum of five Working Days. Discussion then focused on whether three Working Days should be both the minimum and the default, or whether the existing one-Working-Day domestic and two-Working-Day non-domestic minimum should remain.

There was a preference for three Working Days, because it gives a clear and forecastable date. However, the group also raised system impacts, gate-closure timing and whether domestic and non-domestic cases should have different minima. The overall end-to-end duration also needs to be illustrated clearly, including whether calculation creates an additional Working Day. CM will illustrate the full timelines for this, and present this at a future TCW to confirm the groups' opinions on this. The minimum and default number of days is to be confirmed at a subsequent TCW.

WORKSHOP POSITION	POINTS TO CONFIRM	NEXT STEP
Only the Supplier gaining the supply back can set the Working Day parameter. Maximum: five Working Days.	Minimum and default are not fully closed. Three Working Days is the current preference, but domestic or non-domestic differences and gate closure need testing.	The Code Manager will develop example timelines showing the minimum and default options, the impact of Gate Closure and the possible domestic and non-domestic treatments.

6 ADDRESS DATA ITEMS AND UPDATE RULES

CM presented two options for the structure of the address data item.

1. Parsed REL data items
2. New CSS Data Items

The workshop preferred the structure based on parsed REL-style components including Secondary Name, Primary Name, Street, Town and Postcode. The discussion clarified that these would still be new ES Data Items if CSS needs to hold them; the preference is therefore for the clearer REL-style structure rather than an assumption that the existing REL record is reused.

The address will be populated by the initiating Supplier and passed to the other Supplier for operational validation. CSS will not validate the address. Participants agreed that neither Supplier should overwrite the address within the ES process. If additional or corrected address information is needed, the existing Secure Data Exchange Portal (SDEP) route should be used. Consumer Email Address should remain available.

WORKSHOP POSITION	POINTS TO CONFIRM	NEXT STEP
Use new Erroneous Switch address Data Items based on parsed Retail Energy Location-style components. The initiating Supplier will provide the address for the other Supplier to review. Neither Supplier will update the submitted address within the Erroneous Switch process, and the Central Switching Service will not validate it.	Confirm the exact address components, Data Item names, reporting requirements and applicable data-protection and retention requirements.	The Code Manager will update the payload design and retain the Secure Data Exchange Portal (SDEP) as the route for requesting or exchanging further address information.

7 CENTRAL SWITCHING SERVICE STANDARD BODY RESPONSE

The existing CSS Standard Body Response will be used to confirm successful processing or return validation errors. New error codes and business rules may be required, but a bespoke ES response format is not proposed. The current design assumption is synchronous validation.

WORKSHOP POSITION	POINTS TO CONFIRM	NEXT STEP
Reuse the existing CSS Standard Body Response format.	Confirm detailed error codes, rules and whether synchronous validation remains appropriate through impact assessment.	The Code Manager will include the Standard Body Response requirements, error codes and validation approach in the Central Switching Service requirements and Service Provider Impact Assessment.

8 REASON FOR RETURN AND REASON FOR REJECTION ENUMERATION VALUES

For Reason for Return, the workshop preferred using the Domestic Premises Indicator already held in CSS and retaining the shorter A to E set rather than separate lists for domestic, microbusiness and Third Party Intermediary routes. This avoids a long list that may be difficult to apply consistently and a potentially increased chance of user error/misuse.

Technical Issue should remain, but it must be clearly electricity-specific and limited to related Meter Point Administration Number scenarios, such as Metering Points that are split or related incorrectly.

For rejection, members agreed that the Supplier which took the supply erroneously should not be able to reject a domestic return. For the responding Supplier, the five detailed rejection reasons should be simplified to a single Gaining Supplier valid-contract reason, supported by Additional Information. A non-

domestic no-valid-contract concept may still be required, but the legal text and controls need further refinement.

WORKSHOP POSITION	POINTS TO CONFIRM	NEXT STEP
Use the Domestic Premises Indicator already held in the Central Switching Service and retain Reason for Return values A to E. Remove the duplicated microbusiness and Third Party Intermediary values. Retain Technical Issue as an electricity-specific reason for split or incorrectly related Meter Point Administration Numbers.	Confirm the final wording of Technical Issue and whether any additional Reason for Return values are genuinely required.	The Code Manager will update the enumeration design and circulate the revised Reason for Return values for review.
Simplify the rejection reasons. For a domestic premises, the Supplier regaining the supply should not be able to reject the return. The Supplier currently registered following the erroneous switch should use a single valid-contract rejection reason, supported by Additional Information.	Confirm whether a non-domestic no-valid-contract rejection reason is required and define the circumstances in which it may be used without creating consumer detriment.	The Code Manager will develop the revised rejection values and supporting legal text for review at a future Technical Change Workshop.

9 NEXT STEPS

The TCW did not reach the detailed re-registration and remaining business or code-rule considerations. These will be carried into the next TCW.

NEXT STEP	WHAT NEEDS TO HAPPEN
Develop the preferred sequencing model	Update the process design to reflect sequential messaging and test the operational, technical and cost implications through the Service Provider Impact Assessment.
Confirm supplier terminology	Develop the Erroneous Switch-specific Gaining Supplier and Losing Supplier terms and confirm how these will be reflected in the Data Items, legal text and Supplier guidance.
Validate response times	Test the proposed five and eight-Working-Day response periods across gas, electricity, domestic and non-domestic scenarios. Updated data on the SLA adherence percentage to be shared too.
Update the message payloads	Correct the Working Day fields and reflect the agreed final response to both Suppliers, including the future Supply Start Date.
Confirm future Supply Start Date rules	Confirm the minimum and default period, how gate closure will apply and whether different treatment is needed for domestic and non-domestic registrations.
Resolve data-handling requirements	Confirm the security, storage and retention requirements for consumer information passed through the Central Switching Service.
Resolve more complex Erroneous Switch scenarios	Complete further design work on pending or subsequent Switch Requests, current versus historic registrations, related Meter Points and multi-Supplier or trilateral cases.
Complete the re-registration and business-rule review	Carry the re-registration process and remaining business or code-rule considerations into the next Technical Change Workshop, including the registration window, treatment of interventions, withdrawals and annulments, and the detailed Central Switching Service validation rules.