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01	Proposal Plan
02	Impact Assessment
03	**Consultation**
04	Final Recommendation

CHANGE REPORT

R0180 CLARITY ON USE OF ON HOLD FOR SWITCHING ISSUES, INCLUDING THE OBLIGATIONS OF CSS USERS

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	06 November 2026
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Technical Expert Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	Medium	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Energy Suppliers, Switching Operator, CSS Users		

LEAD ANALYST	TECHNICAL LEAD (SOLUTION LEAD)	ASSURANCE LEAD
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OVERVIEW

This proposal seeks to introduce additional obligations on Central Switching Service (CSS) Users to engage with the Switching Incident resolution process.

CODE MANAGER MINDED TO POSITION

The Code Manager recommends that the REC Technical Expert Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 06 November 2026.

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BACKGROUND

1 SUMMARY

Within the CSS system, some Switching Incidents are on hold waiting for resolution. The CSS Service Desk team have a process to chase every three days, escalate and make phone calls. However, the incident cannot be closed until confirmation is received from the end-user and information is verified from their systems.

There are issues engaging with Energy Suppliers within the incident management process, issues with the correct contact details being held and that tickets are assigned to an individual person rather than an organisation.

The Switching Operator puts these tickets on hold, which is an approved business process from the Switching Programme. This is not reflected in the obligations on Switching Data Service Provider (SDSP) or other REC Service Providers, where there is no on hold concept. Furthermore, there are no obligations on CSS Users to respond in a defined timeframe. This means that the REC obligations do not reflect current practice, and many tickets remain open much longer than necessary.

Note. This does not apply to Distribution Network Operators (DNOs) and SDSPs with service desks and is more specifically, Energy Suppliers. This is because they already have defined Service Level Agreements in place.

2 PROBLEM STATEMENT

A lack of obligations is causing issues with open tickets relating to missing messages. Tickets placed on hold also require significant additional work for the Switching Operator, which could either be released as a cost saving or it could result in time freed up for improvement activities.

3 IMPACTS

REC SERVICE PROVIDERS
Switching Operator

RECCO / REC CODE MANAGER
None

REC PARTIES AND SERVICE USERS
Energy Suppliers

REC DOCUMENTS / PRODUCTS
Central Switching Service

MHHS
This Change Proposal has no impacts on MHHS.

4 CROSS-CODE IMPACTS

No cross-code impacts have been identified with this Change Proposal.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**01-Aug-24**	**26-Feb-26**
	Solution Development	August-24	January-25
	Service Provider Impact Assessment (part one)	February-25	April-25
	Solution Refinement	April-25	June-25
	Service Provider Impact Assessment (part two)	July-25	September-25
	Solution Refinement	September-25	September-25
	Party Impact Assessment	October-25	October-25
	Business Case Assessment	November-25	February-26
Change Proposal		**27-Feb-26**	**28-Apr-26**
	Consultation	February-26	March-26
	Final Determination	March-26	April-26
Voting		**29-Apr-26**	**29-Apr-26**
	Appeal Window	30-April-26	15-May-26

The previous version of this Proposal Plan finished at Party impact assessment. The Code Manager needed to review the responses from both Party and Service Provider impact assessment in order to determine the next steps of the plan.

6 STAKEHOLDER ENGAGEMENT

This issue was raised by the REC Performance Assurance team with a high-level summary of a potential solution option. Initial discussions were held with the Switching Operator (SO) and a further option was identified. These will be referred to as solution options one and two, respectively, throughout this report.

This issue was presented at the Change Issue Group on the 01 August 2024 (minutes available on the REC Portal) and a high-level overview of solutions options one and two were provided. Little feedback was received, but the general view was that both options should be explored. After the Change Issues Group, the Code Manager identified a third solution option and the Technical Design Authority identified a fourth solution option, which would look at automating the closing process of tickets.

All four options were issued for Party and Service Provider Impact Assessment to determine preference of which option to progress to consultation.

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7 PRIORITY STATUS AND URGENCY

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	1	27	27
	Retail Markets Impact	Retail Risk(s)	2	17	33
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	7	7
		Legal and Regulatory Compliance	1	14	14
Resource	Complexity / Effort / Duration		2	9	18
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	0	10	0
				Overall Priority Score (rounded)	108

Priority Status	MEDIUM
Change Proposal Type	STANDARD

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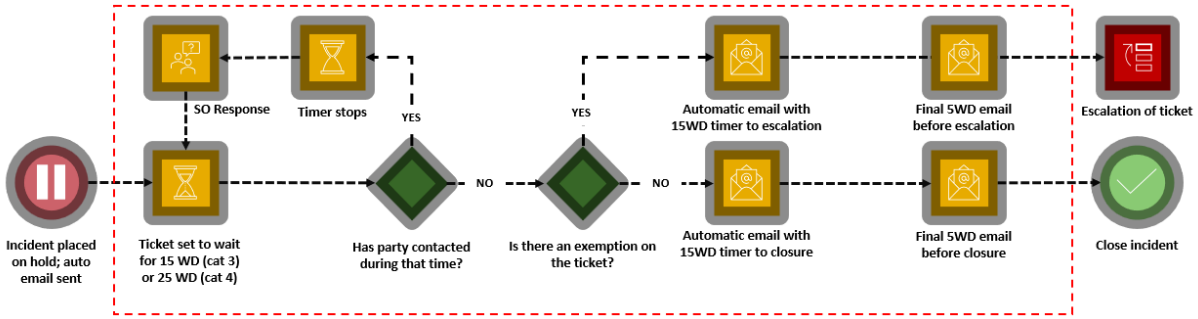
SOLUTION

8 PROPOSED SOLUTION

Of the four solution options taken to Service Provider and Party impact assessment, the Code Manager has elected to progress solution option four. More information on solution options one through three can be found in section 9 of this Change Report and within the solution development report available here.

The proposed solution would introduce an automated system within which the System Operator would follow a standard protocol for closing on hold Category 3 and 4 tickets after a certain amount of time has lapsed with no response from a User.

The process is described in the diagram below.



The process involves sending an initial automated email to notify the relevant Party when a ticket is placed on hold. This is followed by a second automated email at a set interval (15WDs for Category 3 tickets and 25WDs for Category 4 tickets) warning of a potential closure after a further 15WD waiting period. 5WDs days before the end of this 15WD waiting period, a final email will be sent to all contacts from the relevant Party as a last attempt to resolve the ticket. If no action is taken, the ticket will be closed, though users have 3WDs to reopen it if required.

For tickets with exemptions, the second email will alert the relevant Party that the ticket will be escalated rather than closed after a further 15WDs. 5WDs before the end of this 15WD period, a final email will be sent to all contacts from the relevant Party as last attempt to resolve the ticket. If no action is taken, the ticket will be escalated.

Category 3 and 4 tickets that are exempt are the following:

- The ticket is related to a CSS Certificate, Switching Change or Switching Problem;
- The ticket is awaiting a data fix; and
- The ticket is related to a child or parent ticket.

Should a response be received from the Party whilst the ticket is in the on-hold process, the timer will pause until acknowledged by DCC, after which the ticket will return to the beginning of the process.

This solution differs slightly to that proposed at Party impact assessment, as it now has no performance assurance requirements.

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9 DESCOPED SOLUTIONS

Further information on these solution options can be found within the solution development report available here.

9.1 SOLUTION OPTION ONE

Solution option one proposed the introduction of a new clause within Schedule 26 – Switching Service Management, setting out Market Participant responsibilities for the resolution and closure of Switching Incidents. It also contained a requirement for reporting from the Switching Operator to identify Parties that are disengaged with the process and be subject to Performance Assurance Techniques.

9.2 SOLUTION OPTION TWO

Solution option 2 defined an approach to provide CSS Users with a timeframe to respond to incidents and enables the Switching Operator to close the incident, after an agreed period of no response.

9.3 SOLUTION OPTION THREE

Solution option 3 offered a hybrid approach of options one and two, setting timescales for Market Participants to provide a positive response. However, if this lapses, and the Switching Operator have chased and there is no response then the Switching Incident can be closed. This also included the same Performance Assurance requirements as solution option one.

10 DRAFT LEGAL TEXT

There are no legal text changes required to deliver the proposed solution to R0180.

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PRELIMINARY ASSESSMENT

11 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

11.1 SERVICE PROVIDER IMPACT ASSESSMENTS

An initial Service Provider impact assessment was conducted with the DCC in their role as the Switching Operator from 25 February 2025 to 28 March 2025 on solution option four only. A further impact assessment was conducted on all four solution options from 27 August 2025 to 30 September 2025.

A Service Provider impact assessment was also conducted with REC Performance Assurance from 07 July 2025 to 08 August 2025.

A summary of these impact assessments has been provided below.

SWITCHING OPERATOR	• The Switching Operator provided the below costs for the implementation of this Change Proposal, split per solution option. 1. £1,955 design/build/test, plus one FTE estimated at £60,000 per annum on-going 2. £0 design/build/test, plus one FTE estimated at £60,000 per annum on-going 3. £1,955 design/build/test, plus one FTE estimated at £60,000 per annum on-going 4. £66,890 design/build/test with no on-going costs • The Switching Operator did not initially provide a cost for the one FTE on-going cost and the Code Manager proceeded to Party impact assessment without this information. This has now been provided at an estimated £60,000 per annum. • The Switching Operator highlighted that the on-going cost for solution options one through three would rise if the number of tickets required to be manually closed significantly increased, as more FTE would be required. • The Switching Operator confirmed the lead time they required between the Change Proposal being approved and implemented to allow for design, build and test was one month for solution options one through three, and 23 weeks for solution option four. • The Switching Operator highlighted solution option four as their preferred solution option as it removes manual effort, futureproofs against increases in ticket volumes and should see a reduction in error caused by manual processing.
REC PERFORMANCE ASSURANCE	• REC Performance Assurance confirmed their costs for solution options one and three as £22,130 design/build/test with no on-going costs. However, it was highlighted that while there no on-going costs associated at this time, this would be re-evaluated in the future if a high number of interventions were required by the Performance Assurance team.

	• Solution option two has no Performance Assurance requirements so has no associated costs. After further discussion between RECCo, REC Performance Assurance and the REC Change Team, it has been determined there are no Performance Assurance required for solution option 4 so again there are no associated costs. • REC Performance Assurance confirmed the lead time they required between the Change Proposal being approved and implemented was one month. • REC Performance Assurance highlighted some category three changes would be required if solution options one or three were taken forward, with updates to the Risk Register and User Guides required.

11.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was conducted from 02 October 2025 to 24 October 2025. In total three responses were received from Energy Suppliers. The non-confidential responses have been published here.

ENERGY SUPPLIERS	• Two Energy Suppliers confirmed their preferred solution option as option two, and the third confirming they felt Performance Assurance requirements were necessary so did not support option two. • One Energy Supplier did raise they felt the REC should contact all Supplier Contract Managers to ensure the contact details provided are up to date. The Code Manager has confirmed an annual exercise is already conducted with all Parties requesting they check and update all their operational contacts, including their Contract Manager. • No comments were provided on the legal text for any solution options, and no missing scenarios or processes were identified. • One Energy Supplier confirmed they required three months between implementation and approval, another confirmed one to two months. This was not differentiated between solution options. The third Energy Supplier provided no comments to this question. • One Energy Supplier confirmed their costs as being less than £10,000, another as £0 and the third provided no estimated costs. • No risks to MHHS qualification or migration plans were identified. • Benefits from the implementation of this Change Proposal were identified as helping to resolve Switching issues in a timely manner and administrative savings through the closure of aged messages and avoidance of follow ups on irrelevant issues.

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12 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

12.1 RISKS AND ISSUES

NO.	RISK	NOTES	MITIGATION
R01.R0180	There is a risk that automatically closing tickets from the DCC service desk impacts Landmark service agent performance measures and reporting if any new category field affects existing downstream processing.	This only relates to solution option four.	Closed – not flagged at Service Provider impact assessment.

There are no issues identified with this Change Proposal.

12.2 ASSUMPTIONS AND DEPENDENCIES

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A01.R0180	There is an assumption that an automated closure mechanism is available to synchronise DCC service desk and no changes are required to Landmark service desk as a consequence of this change.	This only relates to solution option four.	Closed – validated as part of Service Provider impact assessment.

There are no dependencies identified with this Change Proposal.

13 BUSINESS CASE ASSESSMENT

13.1 COSTS

Solution option	REC Performance Assurance – design, build, test	REC Performance Assurance – ongoing	Switching Operator – design, build, test	Switching Operator – ongoing	Total
Option 1	£22,130	£0	£1,955	One FTE - £60,000 per annum	£24,085, plus £60,000 per annum for the Switching Operator
Option 2	£0	£0	£0	One FTE - £60,000 per annum	£0, plus £60,000 per annum for the Switching Operator
Option 3	£22,130	£0	£1,955	One FTE - £60,000 per annum	£24,085, plus £60,000 per annum for the Switching Operator
Option 4	£0	£0	£66,890	£0	£66,890

The above table has been amended from Party impact assessment to capture:

- That the Switching Operator on-going FTE cost is £60,000 per annum; and
- To the remove Performance Assurance requirements from solution option 4.

The implementation of this Change Proposal is expected to see minimal costs to Parties, with two Parties at impact assessment confirming they foresaw costs being less than £10,000 and £0.

13.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
REDUCTION OF ADMINISTRATIVE BURDEN FOR THE SWITCHING OPERATOR IN REMOVING THE NEED FOR FOLLOW UP QUERIES	The implementation of the proposed solution would see the automatic closure of non-exempt Category 3 and 4 tickets at set time scales. This will reduce the administrative burden on the Switching Operator to follow up with Energy Suppliers to close tickets, potentially with incorrect contact details for that Energy Supplier. The Code Manager sends an annual reminder for Parties to cleanse their operational contact details and Parties are obligated to ensure their details remain up to date (REC Main Body clause 24.6). However anecdotal evidence received by the Code Manager from the Switching Operator shows they often struggle for correct contact details when escalating tickets. This Change Proposal will remove this problem for non-exempt Category 3 and 4 tickets.
REDUCTION IN THE POTENTIAL FOR MANUAL ERROR OF CLOSING TICKETS	A benefit for solution option four over one, two or three is that it's an automated solution and does not require an employee to manually close tickets. This reduces the risk that a ticket will be closed in error that should not have been, or that a ticket remains open when it should be closed, due to manual processing error.
ABILITY TO SCALE IF TICKET VOLUME INCREASE	A benefit for solution option four over one, two or three is that it's an automated solution and so can scale more easily if ticket volumes were to increase. As solution options one to three involved an employee manually closing tickets, the Switching Operator highlighted in their Service Provider impact assessment that were the volume of tickets to increase, the on-going cost to serve (currently estimated as £60,000 per annum) would also increase.
REDUCTION OF ADMINISTRATIVE BURDEN FOR PARTIES THROUGH THE CLOSURE OF AGED TICKETS	The implementation of the proposed solution would see the automatic closure of non-exempt Category 3 and 4 tickets at set time scales. This will reduce the administrative burden on Parties with many open tickets as they will not be required to manually close all these tickets. However, the Code Manager does acknowledge this may encourage Parties to rely on this automatic closure functionality rather than manually closing tickets. This is why the solution is restricted to Category 3 and 4 tickets, with several categories of these tickets being exempt from this process (relating to CSS Certificate or Switching, awaiting a data fix or if the ticket is related to a parent or child ticket).

13.3 COST BENEFIT ANALYSIS

Solution option 4 has a central cost of £66,890 in design, build and test costs, no-going operational costs and expected to have minimal costs to Parties.

This solution option has been picked over options one through three as the on-going cost of £60,000 per annum means they will cost more than solution option four in the long term. Even when compared to solution option 2, which has no up-front costs and only on-going costs, solution option four becomes cheaper after having been implemented for less than 14 months. This payback period is even shorter when compared to solution options one or three as they have upfront as well as on-going costs.

The Code Manager also believes solution option four will have the lowest impact to Parties as it does not introduce additional obligations on them.

Based on this and the four intangible benefits listed in section 13.2, the Code Manager believes there is a positive case for change for implementing solution option four.

14 CASE FOR CHANGE

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 a central system cost of £66,890 and no on-going costs, and minimal associated Party costs;
- Has an associated payback period of less than 14 months (compared to other solution options considered);
- Has proportionate effort required for implementation;
- Reduces the administrative burden for the Switching Operator on following up on tickets in scope of the solution;
- Should not lead to manual errors regarding tickets closure;
- Has the ability to scale if the volume of tickets increases so is futureproofed; and
- Reduces the administrative burden for Parties as would close their aged tickets in scope of the solution.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	n/a
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
ANY OTHER DOCUMENTS	Solution development report

16 GLOSSARY

TERM	DEFINITION
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.
Consumer	means any person supplied (or seeking a supply) of Energy at an RMP (whether or not that person also exports or is seeking to export electricity at an RMP).
CSS Users	means each organisation which is Qualified to use the CSS, together with each Switching Data Service Provider (other than the CSS Provider) the categories of which are set out in the Central Switching Service Schedule.
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Switch	means a change to the Registered Supplier for an RMP.
Switching Data Service Providers (SDSP)	means the CSS Provider, the SMDSP (in respect of the services provided under the Smart Energy Code), the Enduring Change of Supplier Service Provider (in respect of the services provided under the Smart Energy Code), the Gas Retail Data Agent, the Electricity Retail Data Agents, and the Enquiry Service Providers.
Switching Incident	means an issue that arises with a System or process forming part of the Switching Arrangements that has been working but is no longer working or is not working correctly.
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 Users to report incidents and access service management support, from the CSS Go-Live Date.