RETAIL ENERGY CODE

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REC ISSUE SUBMISSION FORM (COPY)

1 PERSONAL DETAILS

PROPOSER NAME *(Mandatory)*	James Hardy
COMPANY *(Optional)*	REC Code Manager
COMPANY TYPE *(Optional)*	
TELEPHONE NUMBER *(Optional)*	
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2 ISSUE SUMMARY

ISSUE TITLE *(Mandatory)*	Erroneous Switch Review: Amendments to Clause 4.5
WHAT IS THE ISSUE YOU ARE SEEKING TO SOLVE? *(Mandatory)*	Schedule 30, Section B, Clause 4.5 currently permits Energy Suppliers to raise an Erroneous Switch (ES) within 24 months of the suspected ES taking place. However, analysis from the I0237 Erroneous Switch Review shows that 98% of ESs are raised within the first 12 months, and Energy Suppliers rarely, if ever, rely on the full 24-month window. The existing 24-month allowance no longer reflects operational practice and maintains an unnecessarily long resolution period that adds complexity and increases the potential for data quality issues, Consumer confusion, and prolonged operational uncertainty. When the original 24-month time limit was introduced (prior to REC Go-Live), it was expected that this would later be reduced to 12 months soon after

	implementation. However, this subsequent reduction did not take place. The I0237 working group has since reviewed the position and, in agreement with the Code Manager, concluded that this change should now be implemented alongside the I0237 Erroneous Switch Review.
WHAT IMPACT IS THIS HAVING? *(Mandatory)*	An unnecessarily long window to raise an Erroneous Switch process causes the following impacts: • Creates misalignment between industry process and actual behaviour. • Prolongs the timeframe in which Energy Suppliers must maintain monitoring and support for legacy registrations. • Introduces an additional training burden for Energy Suppliers with extended operational overhead for exceptions that rarely occur. • Causes uncertainty for Consumers, who may be contacted long after the Switch event, and negatively impacts the Consumer Switching experience. • Adds complexity to reporting, as the current window is not reflective of real-world practice.
WHAT DO YOU CONSIDER TO BE AN EFFECTIVE SOLUTION? *(Mandatory)*	Amend Schedule 30 – Resolution of Consumer Facing Switching and Billing Issues, Section B, Clause 4.5 to: "This Section B shall only be used in the period of 12 months ~~24 months~~ following the suspected Erroneous Switch. Beyond this point, Energy Suppliers shall seek to agree bilaterally how to treat a potential Erroneous Switch. The Gaining Supplier shall write to the Consumer within 5 Working Days of identifying that an Erroneous Switch has occurred (including via bilateral discussions with the Losing Supplier) setting out: (a) The Erroneous Switch process has commenced or; (b) The reasons why the Erroneous Switch process cannot complete; and (c) The Consumer's rights to Switch to another Energy Supplier" This aligns the Code with evidence-based operational practice, reduces unnecessary process overhead, and simplifies Energy Supplier obligations.

IS THERE ANY BACKGROUND INFORMATION OR CONTEXT TO THE ISSUE THAT WOULD BE USEFUL? *(Optional)*	The I0237 Erroneous Switch Review demonstrated that 98% of ETs are raised within 12 months, making the 24-month period disproportionate. Workgroup consensus reached that a reduction to 12 months offers efficiency gains without negatively impacting Consumers. No negative operational, system or Consumer impacts were identified by the workgroup when discussing the shortening of the window. However, the Code Manager will still proceed with a Party impact assessment as part of the Change Process to review this expectation.
DOES THIS ISSUE RELATE TO AN EXISTING ISSUE RAISED OR AN EXISTING CHANGE PROPOSAL? IF SO, PLEASE PROVIDE DETAILS OF THE ISSUE OR CHANGE PROPOSAL.	I0237 – Erroneous Switch Review

3 CONSUMER IMPACTS

WHICH CONSUMER TYPES WILL BE IMPACTED BY THIS ISSUE? *(Mandatory)*	☒ All ☐ Electricity ☐ Gas ☐ Domestic Prepayment ☐ Domestic Credit ☐ Microbusiness ☐ Small and Medium Enterprise (SME) ☐ Industrial and Commercial (I&C) ☐ Other (please specify in the Additional information box below)
WHAT IMPACT WILL THIS ISSUE HAVE FOR THESE CONSUMERS? *(Mandatory)*	☒ Switching experience ☒ Billing accuracy ☒ Trust and confidence ☐ Safety ☐ Security of supply ☒ Ability to pay ☐ On site experience ☐ Achieving Net Zero

	☐ Other (please provide details in the Additional information box below)
ADDITIONAL INFORMATION *(Optional)*	

DOES THIS ISSUE CONTRIBUTE TO THE ACHIEVEMENT OF NET ZERO? *(Mandatory)*	N/A
ADDITIONAL INFORMATION *(Optional)*	

4 CODE IMPACTS

Does this Issue relate to or impact:

THE REC OR REC SCHEDULES? *(Optional)*	☐ Main Body ☐ Schedule 1 - Interpretations and Definitions Schedule ☐ Schedule 3 - Accession Agreement ☐ Schedule 4 - Company Governance ☐ Schedule 5 - Change Management ☐ Schedule 6 - Performance Assurance ☐ Schedule 7 - Energy Theft Reduction ☐ Schedule 8 - Unbilled Energy Code of Practice ☐ Schedule 9 - Qualification and Maintenance ☐ Schedule 10 - Charging Methodology ☐ Schedule 11 - Prepayment Arrangements ☐ Schedule 12 - Data Access ☐ Schedule 13 - Transfer of Consumer Data ☐Schedule 14 - Metering Operations ☐ Schedule 15 - Metering Accreditation ☐ Schedule 17 - Secure Data Exchange ☐ Schedule 18 - Green Deal Arrangements

	☐ Schedule 19 - Market Exit and Supplier of Last Resort ☐ Schedule 22 - Market Stabilisation Charge ☐ Schedule 23 - Registration Services ☐ Schedule 24 - Switching Data Management ☐ Schedule 25 - Central Switching Service ☐ Schedule 26 - Switching Service Management ☐ Schedule 27 - RMP Lifecycle Schedule ☐ Schedule 28 - Related Metering Points ☐ Schedule 29 - Address Management ☒ Schedule 30 - Resolution of Consumer Facing Switching and Billing Issues ☐ Schedule 31 – Prepayment Method Levelisation Reconciliation ☐ Schedule 32 - Electricity Supply to Hydrogen Electrolysers ☐ Schedule 33 - Non-Domestic Change of Occupier
ADDITIONAL INFORMATION *(Optional)*	

OPERATIONAL DOCUMENTS *(Optional)*	☐ Consolidated Metering Code of Practice (CoMCoP) ☐ Cross Code Steering Group Terms of Reference ☐ Performance Assurance Board Terms of Reference ☐ Performance Assurance Report Catalogue ☐ REC Change Panel Terms of Reference ☐ Smart Meter Installer Domestic Customer Survey ☐ Smart Meter Installer Microbusiness Customer Survey
ADDITIONAL INFORMATION *(Optional)*	

SERVICE SPECIFICATION *(Optional)*	☐ Central Data Service Provider Further Services Service Definition ☐ Central Switching Service Definition ☐ CSS Certificate Authority Service Definition ☐ Electricity Enquiry Service - Service Definition ☐ Electricity Retail Data Service Definition

	☐ Gas Enquiry Service Definition ☐ Gas Retail Data Service Definition ☐ Green Deal Database Service Definition ☐ Secure Data Exchange Service Definition ☐ Switching Operator Service Definition
ADDITIONAL INFORMATION *(Optional)*	

API TECHNICAL SPECIFICATION *(Optional)*	☐ EES API Technical Specification ☐ GES Meter Asset Enquiry API Technical Specification ☐ GES Supply Point Switching API Technical Specification ☐ GES Supply Point Enquiry API Technical Specification
ADDITIONAL INFORMATION *(Optional)*	

THE DATA SPECIFICATION *(Optional)*	☐ Data Access Matrix ☐ Data Item Catalogue ☐ Market Message Catalogue ☐ Standards Definition ☐ Supply Number Format
ADDITIONAL INFORMATION *(Optional)*	

CENTRAL SYSTEMS OR REC SERVICES? *(Optional)*	☐ Central Data Service Provider Further Services ☐ Central Switching Service (CSS) ☐ CSS Certificate Authority ☐ Electricity Enquiry Service ☐ Electricity Retail Data Service ☐ Electricity Theft Tip Off Service ☐ Gas Enquiry Service ☐ Gas Retail Data Service ☐ Green Deal Central Charging Database ☐ Secure Data Exchange Service ☐ Switching Operator

ADDITIONAL INFORMATION *(Optional)*	

REC PARTIES AND/OR MARKET PARTICIPANTS? *(Optional)*	☐ AMR Service Providers ☐ Data Aggregators ☐ Data Collectors ☐ Data Services ☐ Smart Meter Data Retrievers ☐ DCC ☐ Distribution Network Operators ☒ Energy Suppliers ☐ EES Users ☐ Gas Transporters ☐ GDCC Users ☐ GES Users ☐ Green Deal Finance Parties ☐ Green Deal Providers ☐ Meter Asset Providers ☐ Metering Equipment Managers ☐ Shippers ☐ Third Party Intermediaries ☐ Virtual Lead Party ☐ Other (please provide details in the Additional Information box)
ADDITIONAL INFORMATION *(Optional)*	

OTHER INDUSTRY CODES? *(Optional)*	☐ Balancing & Settlement Code (BSC) ☐ Distribution Code Use of System Agreement (DCUSA) ☐ Smart Energy Code (SEC) ☐ Uniform Network Code (UNC) ☐ Independent Gas Transporter Uniform Network Code (IGT UNC) ☐ Data Integration Platform (DIP) Rules
ADDITIONAL INFORMATION *(Optional)*	

DOES THIS ISSUE IMPACT A SIGNIFICANT CODE REVIEW? *(Optional)*	No
ADDITIONAL INFORMATION *(Optional)*	

5 ISSUE PROGRESSION

DO YOU BELIEVE THIS ISSUE PROPOSAL MEETS THE CRITERIA FOR 'URGENCY' AND SHOULD BE PROGRESSED UNDER AN URGENT TIMETABLE? **IF SO, PLEASE PROVIDE JUSTIFICATION?** *(Optional)*	No
ARE THERE ANY REQUIRED TIMESCALES FOR THE DEVELOPMENT OF THIS ISSUE? *(Option)*	No later than the development of I0237 Solution.
ARE THERE ANY REQUIRED TIMESCALES FOR THE IMPLEMENTATION OF THIS ISSUE? *(Option)*	As soon as possible due to the impact on Consumer detriment, but no later than any implementation of any potential solutions proposed under I0237.
ARE YOU AWARE OF ANY DEPENDENCIES ASSOCIATED WITH THIS ISSUE WHICH MAY IMPACT ITS PRIORITY OR PROGRESSION TIMETABLE? *(Optional)*	No

6 ATTACHMENTS

ATTACH/PROVIDE ANY SUPPORTING DOCUMENTS TO BE SUBMITTED WITH THE FORM	