RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0180 CLARITY ON USE OF ON HOLD FOR SWITCHING ISSUES, INCLUDING THE OBLIGATIONS OF CSS USERS

On 02 October 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0180 Clarity on use of on hold for switching issues, including the obligations of CSS Users.

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

DOCUMENT VERSION	1.0
RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	04 December 2025
RESPONSIBLE COMMITTEE	REC Change Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	02 October 2025
RESPONSE DEADLINE	24 October 2025

Question 1:	Do you have any comments on solution options 1, 2 3 and 4? Please include which solution option would be your preference and why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE feels that some form of Performance Assurance is important in any solution that is setting obligations on the switching issue resolution. As such, we do not support option 2.	Thank you for your comments.
ENGIE (Energy Supplier)	We prefer solution option 2. This is the simplest option and looks the most cost-effective. We also do not believe that this is an appropriate area for the deployment of Performance Assurance Techniques as there are already sufficient other PA metrics that will address the issues that are created by Parties not responding to CSS messages. To be effective and manageable, PATs should ideally address negative customer outcomes rather than the individual process steps that may have contributed to such an outcome. For this option to be effective Parties would need to be notified of the closure of the incident so that a new incident can be opened if still required.	Thank you for your comments. The existing email notification within the Switching Operator Service Desk will be sent upon ticket closure, whether the ticket is closed manually or automatically.
ScottishPower Energy Retail (Energy Supplier)	Our preferred option would be Solution Option 2.	Thank you for your comments.

Question 2:	Do you agree the proposed solutions address the problem statement, including if any address the problem statement better than others? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE agrees the proposed solutions address the problem statement and, as stated above, solution option 2 less so.	Thank you for your comments.
ENGIE (Energy Supplier)	See response to Q1.	n/a
ScottishPower Energy Retail (Energy Supplier)	We agree that Solution Option 2 addresses the problem statement better than others.	Thank you for your comments.

Question 3:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE feels that the REC should contact all Supplier contract managers to ensure the contact details provided are up to date. Associated ongoing performance reporting will highlight future non-responding parties, who may not have provided updated contact details. This may result in the switch issue tickets being resolved in a timely manner without the need to implement any of the solutions with their associated costs.	Thank you for your comments. The Code Manager conducts an annual exercise with all Parties requesting they check and update all their operational contacts, including their Contract Manager. This is on-going currently.
ENGIE (Energy Supplier)	No, we support Option 2.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	N/A	n/a

Question 4:	Do you think the Code Manager has identified and considered all processes and scenarios that may be impacted through the implementation of the proposed change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	We have not identified any obvious missing scenarios or processes.	Thank you for your comments.
ENGIE (Energy Supplier)	Yes.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	N/A	n/a

Question 5:	Do you have any comments on the proposed legal text for the solution options?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	No.	Thank you for your confirmation.
ENGIE (Energy Supplier)	We have not formally reviewed the legal text.	Thank you for your confirmation.
ScottishPower Energy Retail (Energy Supplier)	N/A	n/a

Question 6:	What lead time would be required for your business to implement the proposed solutions? Please provide justification and specify if different for each solution option.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	All solutions appear to be process impacting with no real differences in lead time. Three months lead time from approval would suffice.	Thank you for your comments.
ENGIE (Energy Supplier)	1-2 months.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	N/A	n/a

Question 7:	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**
SSE Energy Supply (Energy Supplier)	No.	Thank you for your comments.
ENGIE (Energy Supplier)	No.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	N/A	n/a

Question 8:	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. Please specify if different for each solution option. 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
SSE Energy Supply (Energy Supplier)	B) Up to £9,999;	Thank you for your comments.
ENGIE (Energy Supplier)	Nil.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	We cannot accurately forecast cost at this point.	n/a

Question 9:	Do you identify any benefits to your business through the implementation of any of the proposed solutions? Please specify if you identify different benefits for each solution option.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	SSE supports any of the solutions if they help resolve switching issues in a timely manner, all of which would be beneficial to our business.	Thank you for your comments.
ENGIE (Energy Supplier)	Administrative savings through closure of aged messages and avoidance of follow-ups on issues that are no longer relevant.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	N/A	n/a

Question 10:	Taking into consideration both the costs and the benefits seen by your organisation, do you believe any of these solution options should be implemented? Please include which solution option would be your preference and why.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	As mentioned in our response to Q3, we would like to see an updated contact list in operation before any of the solutions listed were taken forward.	Thank you for your comments.
ENGIE (Energy Supplier)	Option 2, and see answer to Q1.	Thank you for your comments.
ScottishPower Energy Retail (Energy Supplier)	In lieu of our response to Q1 and Q2 solution option 2 should be implemented.	n/a

Question 11:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
SSE Energy Supply (Energy Supplier)	No.	n/a
ENGIE (Energy Supplier)	No.	n/a
ScottishPower Energy Retail (Energy Supplier)	N/A	n/a