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CHANGE PROPOSAL EXTENSION TO PLAN

I0237 – ERRONEOUS SWITCH REVIEW: CSS SOLUTION

DOCUMENT VERSION	V4.0
PROPOSED IMPLEMENTATION DATE	TBD
IMPLEMENTATION APPROACH	TBD

RESPONSIBLE COMMITTEE	Change Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	Medium	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Energy Suppliers		

LEAD ANALYST	TECHNICAL LEAD (SOLUTION LEAD)	SUBJECT MATTER EXPERT
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1 CHANGE OVERVIEW

The existing Erroneous Switch (ES) resolution process has been identified as having potential gaps and inefficiencies which may contribute to Consumer detriment, delays in resolution and inconsistent outcomes across the market. As the process has not undergone a comprehensive end-to-end review since REC go-live, I0237 was raised to assess the effectiveness of the current arrangements, including their alignment with Faster Switching and Market-wide Half Hourly Settlement (MHHS). The review sought to identify opportunities to improve the timeliness, consistency and transparency of ES resolution, while reducing unnecessary Switching activity and the risk of inaccurate Consumer billing.

The original I0237 Working Group undertook a comprehensive review of the existing ES arrangements, drawing on Energy Suppliers' operational experience to identify challenges relating to system latency, due diligence, communications, rejection reasons, escalation routes and the use of industry systems, including the Data Transfer Network (DTN) and the Secure Data Exchange Portal (SDEP). Through a series of industry discussions, the Working Group considered improvements to the end-to-end process, associated Supplier obligations, Market Messages and operational guidance. Following the conclusion of this review, I0237 was re-

scoped to focus specifically on delivering a Central Switching Service (CSS) technical solution, with three related changes (R0313 – Erroneous Switch Review: Amendments to Clause 4.5, R0322 – Erroneous Switch Review: I0237 Clarifications and I0326 – Erroneous Switch Review: Assurance Reporting Update) raised to address the wider non-technical and Performance Assurance requirements.

Since re-scoping, a series of Technical Change Workshops (TCWs) have established consensus on the core design principles for a CSS-enabled ES process. The proposed solution introduces a sequential messaging approach covering ES initiation, determination and response, supported by defined Supplier response timescales, CSS validation and orchestration of the ES process. Importantly, TCW discussions have established that an accepted ES should be capable of reaching resolution without necessarily resulting in re-Registration, particularly where subsequent Switching or changes to Registration state make a return inappropriate. Whilst significant progress has been made on the process and supporting data architecture, further technical assessment with the CSS Service Provider is required to determine the appropriate validation approach, including the potential use of asynchronous processing, and assess the complexity of the business rules governing ES progression, Registration precedence and re-Registration eligibility. These outstanding considerations will inform the detailed solution design, associated impact assessments and subsequent implementation planning.

The intended outcome of I0237 is to establish a more consistent, timely and transparent ES resolution process, reducing reliance on bilateral arrangements and improving the ability of Suppliers to progress and resolve ES cases through a centrally orchestrated process. The proposed solution aims to improve Consumer outcomes through defined process timescales, consistent messaging and appropriate CSS validation, whilst minimising unnecessary re-Registration and disruption to subsequent Consumer Switching activity. The measures for assessing these benefits, including resolution timescales, process completion and exception handling, will be developed alongside the detailed solution and associated Performance Assurance requirements.

2 CODE MANAGER RECOMMENDATION

The Code Manager recommends that the REC Change Panel:

- **REVIEW** the extension to plan for I0237; and
- **APPROVE** the extension to plan for I0237.

3 CHANGE PLAN UPDATE

Since I0237 was re-scoped to focus on a CSS technical solution, a series of TCWs have established industry consensus on the core design principles for a CSS-enabled ES process. The proposed solution introduces a sequential messaging approach comprising ES initiation, determination and response, with defined Supplier response timescales and automatic acceptance where no determination is received. The supporting design establishes the use of Meter Point X Number (MPxN) and Supplier Market Participant Identifier (MPIDs) as primary identifiers, associated data architecture and validation requirements, and CSS calculation of a future Supply Start Date (SSD). TCW discussions have also agreed that CSS should validate

ES progression against relevant Registration and process states, and that an accepted and valid ES should be capable of reaching resolution without necessarily resulting in re-Registration. Where re-Registration is appropriate, the design seeks to utilise existing Switching and Registration lifecycle mechanisms while removing Supplier Objection, Withdrawal and Annulment capabilities during the ES-specific return process.

Whilst the core design principles have been established, further technical development is required to determine how these requirements can be implemented within CSS. In particular, engagement with the CSS Service Provider is required to assess whether progression eligibility can be validated synchronously at defined points or whether asynchronous validation is necessary, and to understand the complexity of the business rules needed to manage concurrent Switching activity, historic Registration periods, Supplier MPID changes and ES outcomes that do not result in re-Registration. Further work is also required to finalise the supporting data architecture, enumeration values, process outcomes, Market Messages and exception handling arrangements including appropriate legal text drafting. These considerations may introduce additional requirements for CSS orchestration, Registration-state management and downstream interfaces, which must be assessed before the detailed solution can be confirmed.

To support completion of the detailed solution design, the remaining activities will focus on validating the technical feasibility of the agreed design principles and resolving outstanding business rules and process requirements. The principal areas requiring further development are summarised below.

Outstanding Area	**Activity Required**	**Expected Outcome**
CSS Validation	Assess synchronous and asynchronous validation approaches, including validation against Registration and ES lifecycle states.	Confirmed validation approach, business rules and associated process outcomes.
ES Resolution and re-Registration	Determine how CSS will support accepted ES cases that do not result in re-Registrations.	Confirmed validation/ eligibility rules, process outcomes and Registration requirements.
Concurrent Switching	Assess Registration precedence and competing Switching scenarios throughout the ES lifecycle.	Confirmed rules/ technical routes for managing concurrent Registration activity during ES.
Data Architecture	Finalise Registration identification, data population requirements, enumeration values and historic	Agreed data architecture and associated validation requirements.

	Registration handling procedures.	
Market Message	Finalise message content, response mechanisms and exception handling.	Confirmed messaging requirements and consequential interface changes.
Consequential Impacts	Assess technical, operational, legal and Performance Assurance implications, including related Changes.	Documented impacts and dependencies to inform subsequent drafting / solution refinement activities and governance activities.

The outputs of these activities will inform the refined solution design and CSS Service Provider Impact Assessment, with any outstanding policy or industry decisions referred through the appropriate governance arrangements.

The proposed solution is expected to have implications for Energy Suppliers, Consumers, CSS and potentially other industry Service Providers. For Consumers, the anticipated benefits include improved consistency and timeliness of ES resolution, greater transparency of process outcomes and reduced risk of unnecessary Switching activity. Energy Suppliers will be required to accommodate revised ES messaging, process timescales and operational arrangements, whilst CSS will require changes to support ES orchestration, validation and re-Registration eligibility. Further assessment will establish the extent of these impacts, including any consequential changes to downstream services, REC obligations and Performance Assurance arrangements. The associated costs, benefits, potential disbenefits and implementation requirements will be considered through the detailed solution development and subsequent impact assessment activities.

The proposed extension to the Change Plan is therefore required to allow the outstanding technical considerations to be developed, challenged and assessed with the CSS Service Provider, ensuring that the proposed solution is technically feasible, proportionate and aligned with the agreed Consumer-focused design principles. The additional period will enable the remaining TCW discussions to be concluded, detailed business rules and solution requirements to be refined, and the necessary Service Provider Impact Assessment to be undertaken. It will also provide an opportunity to identify and manage dependencies with related changes, including R0313, R0322 and I0326, and determine any consequential impacts on REC obligations, Performance Assurance and industry processes.

As the remaining design and assessment activities progress, I0237 will transition into the new Code Reform process, with the established design principles, TCW decisions, supporting evidence, outstanding requirements and associated risks, assumptions and dependencies carried forward into the revised Issue Resolution Plan arrangements. The proposed extension will enable these outputs to be consolidated, provide greater clarity on the remaining technical and stakeholder impacts, and establish the evidence required to support subsequent governance decisions. This approach will maintain continuity of the work undertaken to date, minimise duplication of previous industry engagement and provide a structured basis for progressing I0237

through the remaining assessment, approval and implementation stages. The detailed transition approach and subsequent milestones will be confirmed as the new Code Reform arrangements are established.

It should be noted that completion of the Service Provider Impact Assessment (SPIA) does not represent the end of the solution definition process. Given that the proposed approach includes a design-up-front phase, further review, development and refinement of the solution is anticipated following completion of the SPIAs.

		Previous		Current	
Milestone	**Activity**	**From**	**To**	**From**	**To**
Definition		**22 Apr 25**	**31 Dec 26**	**22 Apr 25**	**Xx Apr 27**
	Solution Analysis	**Complete**	**Complete**	Complete	Complete
	Solution Development	September '25	December '26	September '25	March '27
	Technical Change Workshops	June'26	December '26	September '25	March '27
	Service Provider Impact Assessment	June '26	December '26	March '27	April '27