RETAIL ENERGY CODE

This document is classified as **WHITE**.
Information is for public, unrestricted dissemination and publication.

| | |
|---|---|
| 01 | Proposal Plan |
| 02 | Impact Assessment |
| 03 | Consultation |
| 04 | Final Recommendation |

# CHANGE REPORT

## I0281 – EXTENDING R0067 FUNCTIONALITY TO ERDA

| | |
|---|---|
| DOCUMENT VERSION | V1.0 |
| PROPOSED IMPLEMENTATION DATE | TBD |
| IMPLEMENTATION APPROACH | TBD |

| | | | |
|---|---|---|---|
| RESPONSIBLE COMMITTEE | TECHNICAL EXPERT PANEL | CHANGE PATH | SELF-GOVERNANCE |
| PRIORITY STATUS | HIGH | URGENCY | STANDARD |
| IMPACTED STAKEHOLDERS | DISTRIBUTION NETWORK OPERATORS (DNOs), ENERGY SUPPLIERS, DATA COMMUNICATIONS COMPANY (DCC), CENTRAL SWITCHING SERVICE (CSS), ELECTRICITY RETAIL DATA AGENT (ERDA) | | |

| LEAD ANALYST | TECHNICAL LEAD (SOLUTION LEAD) | ASSURANCE LEAD | SUBJECT MATTER EXPERT |
|---|---|---|---|
| FRANCINE PEYROUX-SISSOKO | MAXIME VAN EYSEREN | ANTON MODEN | CHRIS THOMPSON |
| Click to send an email | Click to send an email | Click to send an email | Click to send an email |

## OVERVIEW

This issue aims to extend the Refresh and Resend functionality to the Electricity Retail Data Agent (ERDA). Currently, Central Switching Service (CSS) Market Messages sent from the CSS to Switching Data Service Providers (SDSPs) are sometimes not received, received after Gate Closure, or received in a different order than originally sent.

## CODE MANAGER RECOMMENDATION

On 04 November 2025, the REC Change Panel, on the Code Manager's recommendation, voted to:

- APPROVE the Proposal Plan, including the Responsible Sub-Committee, Change Path, Priority Status, Urgency and timetable.

RETAIL ENERGY CODE

CONTENTS


1 Summary ..... 3
2 Problem Statement ..... 3
3 Impacts ..... 3
4 Cross-Code Impacts ..... 4
5 Proposal Plan ..... 4
6 Stakeholder Engagement ..... 5
7 Priority Status and Urgency ..... 5
8 Summary of Analysis Undertaken ..... 6
9 Proposed Solution ..... 6
10 Risks, Assumptions, Issues and Dependencies ..... 6
11 Appendix ..... 7
12 Glossary ..... 7

RETAIL ENERGY CODE

# BACKGROUND

## 1 SUMMARY

In December 2023, R0067 – Introduction of CSS Refresh Functionality was implemented for the Gas Retail Data Agent (GRDA) because CSS Market Messages sent by the CSS to SDSPs were either not being received, being received after Gate Closure, or were not being received in the order they were originally sent in. This Change provides functionality for the GRDA to call two new Application Programme Interfaces (APIs) for an 'Active Refresh' or 'Status Refresh' of Registration Status. A proof of concept was also developed by Landmark to demonstrate the feasibility of extending the two implemented APIs to handle the ERDA. This was successfully completed in March 2024.

This Issue seeks to extend the Refresh and Resend functionality to the ERDA as CSS Market Messages sent by the CSS to SDSPs are also either not being received, being received after Gate Closure, or are not being received in the order they were originally sent in.

## 2 PROBLEM STATEMENT

CSS messages are not received by the SDSPs in the order in which they were originally sent, or after Gate Closure, so it can be difficult to detect and often requires significant manual effort to resolve. This issue can directly impact Consumer switching experiences, causing disruption and possible delays in a switch.

Since go-live, the DCC has reported that the errors API available to the Distribution Network Operators (DNOs) has been used roughly 20,000 times. It is expected that a significant amount of these incidents could be avoided by the extension of R0067 functionality to the ERDA. Two DNOs have also confirmed having hundreds of incidents which required manual amendments and could have been avoided thanks to the refresh functionality.

It is understood that the DCC will be seeking a derogation from its obligations within Section 8.1 of Schedule 27 – RMP Lifecycle which indicates the possibility for the ERDA, Electricity Enquiry Service (EES) Provider and Gas Enquiry Service (GES) Provider to "Request a Market Message Refresh or Market Message Resend".

The Metering Point Registration System (MPRS) would also benefit from using R0067 for the MHHS Gate Closure Processing. In the MHHS Switching process, if the SecuredActive message is not received between 18:00 and 21:00, the associated Agent Appointments will lapse, causing the switch to fail and potentially leading to customer detriment.

## 3 IMPACTS

| CONSUMERS |
| --- |
| Electricity |

| REC SERVICE PROVIDERS |
| --- |
| Central Switching Service (CSS) |
| Electricity Retail Data Agent (ERDA) |

| RECCO / REC CODE MANAGER |
| --- |

| |
|---|
| Electricity Enquiry Service (EES) |
| Gas Enquiry Service (GES) |

| REC PARTIES AND SERVICE USERS |
|---|
| Distribution Network Operators (DNOs) |
| Energy Suppliers |
| DCC |

| REC DOCUMENTS / PRODUCTS |
|---|
| Schedule 24 – Switching Data Management |
| Schedule 27 – RMP Lifecycle |

| MHHS |
|---|
| St Clements suggestion to build the refresh request into MHHS Gate Closure needs to be understood and will potentially be an impact (improvement) to the intended MHHS design. |
| There will not be direct impacts to DNOs as they are already MHHS qualified, nor will there be an impact to the MHHS Migration process. |
| This Issue could be added to MHHS Cross Code Advisory Group (CCAG) Horizon Scanner depending on St Clements intentions to build refresh requests into Gate Closure under MHHS. |
| Engagement or an impact assessment from the MHHS Programme might therefore be needed depending on the above. If required, initial contact can be made through monthly Horizon Scanning meetings or contacts. |

## 4 CROSS-CODE IMPACTS

No cross-code impact has been identified thus far by the Code Manager.

## 5 PROPOSAL PLAN

| Milestone | Activity | From | To |
|---|---|---|---|
| **Definition** | | **01 Oct-25** | **29 Apr-26** |
| | Solution Analysis | October | December |
| | Solution Development | October | March |
| | Engagement with Technical Change Workshop | November | December |
| | Service Provider Impact Assessment | January | March |
| | Update to the Responsible Committee | April | April |

This Proposal Plan submitted to REC Change Panel only covers part of the Definition milestone until the Service Provider Impact Assessment. This will help the Code Manager fully assess and scope the size of the problem and solution being addressed under I0281.

## 6 STAKEHOLDER ENGAGEMENT

The Code Manager is utilising the REC Technical Expert Panel in their role as critical friend to gather feedback.

Throughout the progression of this Issue, the Code Manager is also planning to engage with several stakeholders during Technical Change Workshop meetings to ensure several discussion points can be taken into consideration and assess the scope of the solution. These stakeholders are:

- The CSS Provider;
- C&C Group as the provider of the EES;
- Xoserve as the provider of the GES;
- The DNOs in their role as the ERDA; and
- St Clements as the provider of the MPRS.

An impact assessment will need to be conducted by the CSS Provider, and the agreed testing Parties who would like to be provided with this solution.

## 7 PRIORITY STATUS AND URGENCY

### PRIORITISATION MATRIX

| Category | Significance / Resource impacts / Urgency | Further selection / breakdown | Score (0-3) | Weighting | Weighted Score |
|---|---|---|---|---|---|
| **Impacts** | Consumer Impact | Direct | 2 | 27 | 53 |
| | Retail Markets Impact | Retail Risk(s) | 2 | 17 | 33 |
| | RECCo / REC Party / REC Service Provider Impact | Operational Effectiveness and Efficiencies | 2 | 7 | 13 |
| | | Legal and Regulatory Compliance | 1 | 14 | 14 |
| **Resource** | Complexity / Effort / Duration | | 1 | 9 | 9 |
| **Strategic Alignment** | Contribution to/ Alignment with the objectives of the REC | | 2 | 17 | 17 |
| | Contribution to/ Alignment with RECCo's Forward Work Plan | | 1 | | 8 |
| **Urgency** *(The need to progress a change to meet a targeted date)* | | Other Planned Activity | 1 | 10 | 10 |
| | | | | Overall Priority Score (rounded) | 158 |

| | |
|---|---|
| Priority Status | HIGH |
| Change Proposal Type | STANDARD |

The Code Manager has given this Issue a high urgency score based upon a weighted prioritisation score of 158. This reflects the potential impact on Consumer switching experience, including disruption and possible delays to switches, as well as significant incidents and Party impacts resulting from the lack of a CSS Refresh Functionality.

RETAIL ENERGY CODE

# SOLUTION

## 8 SUMMARY OF ANALYSIS UNDERTAKEN

A proof of concept was also developed by the CSS Provider to demonstrate the feasibility of extending the two implemented APIs to handle ERDA context. This was successfully completed in March 2024.

Conversations have begun regarding the extension to the GES and EES, with a Technical Change Workshop scheduled for the 4th of November 2025.

## 9 PROPOSED SOLUTION

This Issue seeks to introduce a Refresh and Resend functionality to mitigate these problems for SDSPs in an ERDA context. This has been successfully implemented for the GRDA as part of R0067 allowing systems that interface with the CSS to request a re-send or refresh of out of sync messages, messages received after Gate Closure, or missing messages without the need of manual intervention. The API has been designed to return one of the following event type messages for registration:

- Registration SecuredActive Synchronisation (resend);
- Registration Cancelled Synchronisation (resend); and
- Registration Event Synchronisation (refresh).

The CSS Refresh functionality is currently in use by the GRDA as of December 2023. At the time of implementation, it was highlighted that the functionality would also be available to the EES, GES and ERDA once their own system changes had been made.

REC Technical Services confirmed that the design of R0067 supports extending access to other context types that receive registration status messages and hence could be made available to the ERDA. However, this will require the following enhancements:

1. Provide authorisation to use the new APIs to additional context types; and
2. Implement the generation and delivery of messages specific to the context type of the API caller.

## 10 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

### 10.1 RISKS AND ISSUES

No risks, assumptions, issues and dependencies have been identified by the Code Manager at this stage.

## 11 APPENDIX

| | |
|---|---|
| **CHANGE PROPOSAL** | Link |
| **RELATED CHANGE(S)** | R0067 – Introduction of CSS Refresh Functionality |

## 12 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. |
| CSS Provider | means the DCC when performing functions under or in relation to this Code (but always excluding its functions under the Smart Energy Code and its roles as CSS Systems Integrator, SI Provider and Switching Operator), including in respect of the Central Switching Service and including in effecting the design, build and testing of any System that will allow it to perform functions under this Code after the CSS Go-Live Date. This role is the CSS Procurer and Manager function as described in the E2E Data Migration Plan, E2E Integration Plan, E2E Post Implementation Plan, E2E Testing Plan, E2E Transition Plan: Implementation Approach and E2E Transition Plan: In-Flight Switches Approach. |
| Data Communications Company (DCC) | means the person holding the DCC Licence. |
| Distribution Network Provider (DNO) | means a person holding an Electricity Distribution Licence. |
| Electricity Enquiry Service (EES) | means the service described as such in the EES Service Definition. |
| Electricity Retail Data Agent (ERDA) | means a provider of a DNO's Electricity Retail Data Service. |
| Energy Suppliers | means a person which is either or both an Electricity Supplier and/or a Gas Supplier. |
| Gas Enquiry Service (GES) | means:<br>(a) until CSS Go-Live Date, the enquiry service provided pursuant to the UNC which allows authorised users to access Gas Retail Data; and |

| TERM | DEFINITION |
|---|---|
| | (b) from CSS Go-Live Date, the service of that name procured by RECCo pursuant to the Data Access Schedule. |
| Gas Retail Data Agent (GRDA) | means the provider of a Gas Transporter's Gas Retail Data Service. |
| Gate Closure | means, 17:00 hours on the day before the Supply Effective From Date of a Switch or Initial Registration. |
| Market Message | means a structured communication sent between two Market Participants in the form and with the content required (and as otherwise specified) by the Data Specification. |
| Market-wide Half Hourly Settlement (MHHS) | means market-wide half hourly settlement, which is being introduced pursuant to the BSC (see MHHS Implementation). |
| Metering Point Registration System (MPRS) | means the System used or procured by each DNO in order to provide the Electricity Retail Data Service in accordance with the REC and / or the Supplier Meter Registration Service in accordance with the BSC. |
| MHHS Migration | means the act of migrating a Metering Point in accordance with the REC MHHS Migration Schedule. "MHHS Migrated" shall be interpreted accordingly. |
| Refresh | A Market Message which provides the current details for the requested data items. |
| Registration | means the record in the Central Switching Service for each RMP identifying each Energy Supplier which is registered in respect of that RMP, and the Registration Status of each such registration. |
| Registration Status | means the status which identifies the relationship between an RMP and an Energy Supplier at, or in respect of, a particular period of time, being one of: Pending, Confirmed, Cancelled, Secured Active, Active, Secured Inactive or Inactive. |
| Resend | refers to the act of sending a Market Message again to its intended recipient after it may have not been successfully delivered or received. |
| Secured Active | means the Registration Status as described in Paragraph 1.4 of the Registration Services Schedule. |

| TERM | DEFINITION |
|---|---|
| Switching Data Service Providers | 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. |
| Synchronisation Message | means a type of Market Message, as described in the Switching Data Management Schedule. |