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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

I0331 – REGULATORY ALLIANCE CREATION REJECTIONS

On 04 September 2026, the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for I0331 – Regulatory Alliance Creation Rejections.

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

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RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Caroline Freimuller

DATE IMPACT ASSESSMENT ISSUED	04/09/2026
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Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We have no comments.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No.	Thank you for your comments.
SP Energy Networks (Energy Supplier)	We agree with the intent of this proposed solution, however feel that there is a need for the text to better reflect the source of the regulatory alliance issue. It is not clear from the text what is instigated from code managers, and what is under the control of the DNO as a result of provision in the DCUSA/BSC codes. We assume that this is to be incorporated in the guidance documentation.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	SSE supports the introduction of SLAs on Network parties to confirm the Regulatory Alliance. We would like some clarity on how the Performance Assurance team will be made aware of non-compliance issues.	Thank you for your comments. Where evidence of non-compliance is identified, it can be referred to the REC Performance Assurance function through the existing arrangements and considered on an exception basis. We will ensure it is made clear how concerns regarding non-compliance should be raised.

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Xoserve (Gas Retail Data Agent)	We understand the principle of the change, and in principle agree that there should be timely notifications once an alliance has been established by the originating Code. We do not agree with the proposed solution therefore look forward to working with the REC Code Manager on a revised proposal. We consider that the solution risks dual governance as it seeks to incorporate matters dealt with in the UNC. The Regulatory Alliance between the relevant Transporter and Shipper is established in the UNC, is mastered by the CDSP therefore we believe the extent to which messages can be rejected by CSS are limited. We believe that this change undermines the principles established in the UNC and creates a precedent that we believe is inappropriate and do not believe that SLAs exist for other messages in the REC, where messages from parties responsible for the mastering of data are subjected to validation. I don't think that this level of detail is correct to be applied within the REC Schedules. We do observe that changes have not been considered to the Commercial Alliance. And whilst we do not consider that changes to the Regulatory Alliances are proportionate and required (particularly at the scale proposed), we query consistency as the Commercial Alliances will equally prevent Registration Events if these are not established correctly and in a timely manner. Note: We are reading the definition of a Working Day to mean that once a party becomes aware of a matter that needs to be notified that this	Thank you for your comments. The Code Manager agrees that the establishment of the Gas Transporter/Shipper Regulatory Alliance is governed under the UNC and that the CDSP is the Data Master for those Regulatory Alliance Data Items. Schedule 24 already recognises this position. The purpose of I0331 is not to determine whether the underlying regulatory relationship exists, but to ensure that, once the relevant relationship has been established under the originating code, the information required by CSS is provided and any CSS rejection is addressed within an appropriate timeframe and appropriate parties are informed where errors may need to be addressed in further detail to avoid the impact of Switching delays. Commercial Alliances have not been included because I0331 arose from the Regulatory Alliance process and the approved scope is specifically directed at Regulatory Alliance creation notifications and associated CSS rejections. Although Commercial Alliances also form part of Switching operation data, extending I0331 to that process would broaden the change beyond the problem statement and evidence on which the

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	notification will be issued by no later than the conclusion of the following Working Day, or is it intended to infer that it must be notified at the same time on the following Working Day. Which is this the correct understanding of the SLA proposed?	proposal was raised. If evidence demonstrates a comparable issue with Commercial Alliances, this may be considered separately. Working Day definition infers that once the Party becomes aware of the CSS rejection, they have until the conclusion of the following Working Day to complete investigation of the error.

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Question 2:	Do you agree the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes, we agree that the solution addresses the issue.	Thank you for your comments.
SP Energy Networks (Energy Supplier)	We agree that this solution addresses the problem statement but believe that the text could be more user friendly in terms of where the trigger point is in the removal of the regulatory alliance.	Thank you for your comments. The Code Manager will consider an update to the legal text.
SSE Energy Supply Limited (Energy Supplier)	As SLAs are being put in place, this part of the problem statement is being met, but it will not eliminate all rejections.	Thank you for your comments. The proposed solution will not remove the possibility of a CSS rejection. The purpose of the change is instead to reduce the risk that a valid Regulatory Alliance is not reflected in CSS promptly because the original notification or a subsequent rejection has not been actioned within a defined timeframe.
Xoserve (Gas Retail Data Agent)	We understand the problem statement to be: "The lack of Service Level Agreements (SLAs) on Network Parties to submit Regulatory Alliances to the CSS Provider or to work any rejections received from the CSS Provider can lead to delays in Consumers being able to Switch to their chosen Energy Supplier."	The incident that prompted I0331 involved more than 200 Consumers experiencing delayed Switches because Regulatory Alliances were either not submitted to CSS or CSS rejections were not actioned promptly.

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	In gas, the relationship with Transporters and with Shipper is dealt with in the UNC, and not the REC. Equally the Supplier / Shipper Commercial Alliance is managed in the UNC. It is unclear as to the extent that the issue has been caused by a single or multiple party and the extent to which remedial action has been taken if this relates to a single party. It would be useful to understand the extent to which the issue relates to tardy notifications or rejections of these alliance messages. It would be useful to understand the nature of the synchronous validation failures that occurred in these instances to determine the extent that the proposed solution is proportionate. We believe that this change isn't proposing to change the synchronous validations applied by CSS. Our understanding is that these validations realistically only check structure and that the enumerated values provided are correct. We consider this level of detail in the Code is unnecessary, particularly notification to Shippers of outcomes of synchronous validation assessments.	The Code Manager considers that this demonstrates a gap in the existing end-to-end process, while recognising that it may not warrant changing the underlying UNC or DCUSA arrangements. The solution therefore focuses on ensuring that the obligations introduced are confined to timely notification to CSS and timely resolution of CSS rejections, and where this is not possible that appropriate parties are informed so there are no consequential impacts or delays to Switching Consumers. The solution does not look at changing the synchronous validation applied by the CSS. The validation applied by the CSS is based on structural formatting of the message received through Schema validation, and a number of appropriate business rule validation checks as described in the Category 3 Business Data Validation Rules document.

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Question 3:	Are there any alternate solutions that would better meet the needs of the problem statement?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Not that we are aware of.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No.	Thank you for your comments.
SP Energy Networks (Energy Supplier)	We have not identified any alternative solution.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	We would favour a solution that removes the chances of all rejections, but appreciate this would be far too costly, so we agree there are no better alternatives.	Thank you for your comments.
Xoserve (Gas Retail Data Agent)	There is insufficient information to the problem experienced to determine whether this solution is proportionate or reasonable to place obligations on other parties and whether the correct resolution resides in the REC or an alternative Code. We note that parties should provide this information via defined messages – the extent to which these parties have demonstrated compliance with these might be something that could be checked by the Code Manager as part of qualification and requalification.	The Code Manager has considered whether existing qualification/requalification arrangements would address the problem. Those arrangements may provide assurance over capability but would not establish an operational timeframe for an individual Regulatory Alliance notification or require timely action following a specific CSS rejection. The Code Manager therefore considers that an operational obligation in Schedule 24 remains the more direct way of addressing the identified gap.

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Question 4:	Do you have any comments on the proposed legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No comments.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	No.	Thank you for your comments.
SP Energy Networks (Energy Supplier)	We believe that the legal text could be clearer in terms of what he DNO controls as part of this process.	Thank you for your comments. The Code Manager will consider an update to the legal text.
SSE Energy Supply Limited (Energy Supplier)	No.	Thank you for your comments.
Xoserve (Gas Retail Data Agent)	We disagree that the new line 4.10.1 resides in the REC. The UNC deals with the management of flows between the Transporters and the CDSP therefore is not relevant to this Code. We would like to better understand the nature of the synchronous validation that CSS will apply noting that the CDSP is the master of this data therefore the synchronous validations should only be restricted to formatting issues. Given this, we are unconvinced that this level of detail resides in the REC.	Thank you for your comments. The Code Manager agrees that the underlying Gas Transporter/Shipper Regulatory Alliance is established in accordance with the UNC. The step of 4.10.1 has been added not to duplicate or supersede the UNC process but to ensure that the REC requirement begins at the appropriate point for communicating an established Regulatory Alliance through the Switching arrangements.

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	We are not convinced that this level of detail is considered elsewhere in the REC regarding synchronous responses. We are concerned with this precedent and would be interested to understand the Code Manager's view on this, and if this is unusual that this level of detail is provided, we would welcome an understanding as to the reason why this approach has been taken here. We are not convinced that 4.10.7 resides in the REC as notification to Shippers should be considered in the UNC nor do we consider that any rejections originating from CSS could be considered valid from a UNC perspective when it is this Code that masters these relationships. We note that 4.10.10 doesn't place any obligations where an alliance has ended. And whilst we disagree that this is relevant when it is created it would be useful to understand the inconsistent approach applied to the legal text – i.e. why does the Code Manager consider the level of oversight is necessary on creation, but not ending such alliances. From a REC Party perspective, I would imagine both are as important. Whilst we disagree with the solution proposed we note that it also does not consider Shipper to Supplier Alliances. Can the Code Manager share reasons why this doesn't apply?	Schedule 24 governs the Market Messages sent to and from CSS, including synchronous validation and the treatment of failed validation. The additional drafting is intended to close the identified process gap by specifying what happens operationally after a Regulatory Alliance message is rejected, and provide the resolution within the specified problem statement whereby Consumers switches have been delayed as a result of the CSS rejection of the Alliance messaging not having been resolved. The Code Manager recognises the concern regarding notification to the Shipper (4.10.7). The purpose of the provision is to ensure that, where the Regulatory Alliance cannot be successfully updated in CSS, the affected party is aware that the issue remains unresolved. Whilst Shippers currently are not a Party to the REC, the REC could place obligations on the Shipper, but that would require them acceding to the Code in the future. The original incident and problem statement were principally concerned with delays in establishing Regulatory Alliances in CSS and

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		with unresolved CSS rejections, because these can prevent a Consumer Switch. The drafting for ended alliances therefore does not currently replicate every creation/re-establishment control. The Code Manager agrees, however, that the different treatment should be intentional and clearly justified, and will review the end-of-alliance provisions for consistency. The Shipper/Gas Supplier relationship is a Commercial Alliance rather than the Regulatory Alliance that is the subject of I0331. It has therefore not been included in the proposed solution. Extending the change to Commercial Alliances would broaden the approved problem statement and would require evidence that the same control gap exists for that process.

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Question 5:	Do you agree with the Code Manager's decision not to introduce routine Performance Assurance monitoring/reporting for this Issue?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes, we agree that no Performance Assurance monitoring or reporting is required due to this being a rare occurrence.	Thank you for your comments.
SP Energy Networks (Energy Supplier)	We agree that this does not require self-reporting to the PAB, as this is not an ongoing issue and should be dealt with as an as and when requirement.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	SSE agrees with the decision. For the scale of the problem, the introduction of Performance Assurance monitoring is both costly and a further reporting obligation.	Thank you for your comments.
Xoserve (Gas Retail Data Agent)	We consider that doing so would be disproportionate. But equally question the proportionality of the proposed solution given that the problem statement appears to reference instances of failure by a single party.	Thank you for your comments. The Code Manager agrees that routine Performance Assurance monitoring would be disproportionate, which is why it is not proposed. The Code Manager considers the underlying legal change separately: it establishes clear operational expectations for an event which, although infrequent, can materially delay Consumer Switching. The absence of routine reporting is intended to

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		keep the assurance response proportionate while retaining the ability to investigate exceptions where they arise.

Question 6:	Do you think we have identified and considered all processes and scenarios that may be impacted through the implementation of the proposed change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We believe so.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes.	Thank you for your comments.
SP Energy Networks (Energy Supplier)	Yes, but as above the DNO prompted removal of the regulatory alliance could be clearer to ensure all obligations are understood.	Thank you for your comments. The Code Manager will consider an update to the legal text.
SSE Energy Supply Limited (Energy Supplier)	We are not aware of any other processes and scenarios that should have been considered.	Thank you for your comments.
Xoserve (Gas Retail Data Agent)	There is insufficient information as to the issue to consider this fully.	Thank you for your comments.

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Question 7:	What lead time would be required for your business to implement the proposed solution? Please provide justification.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	N/a	N/A
Northern Powergrid (Distribution Network Operator)	Approximately 1 month is required to implement the changes required to current ITSM processes.	Thank you for your comments.
SP Energy Networks (Energy Supplier)	We would not need a long lead time as long as the guidance and legal text are clear on the process and the appropriate contacts at REC for enacting this process.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	No lead time required.	Thank you for your comments.
Xoserve (Gas Retail Data Agent)	We do not consider that there is sufficient information to fully assess the solution.	Thank you for your comments.

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Question 8:	Are you aware of any constraints on when this change can be delivered?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No.	N/A
Northern Powergrid (Distribution Network Operator)	No.	N/A
SP Energy Networks (Energy Supplier)	We have not identified any constraints	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	No.	N/A
Xoserve (Gas Retail Data Agent)	We do not consider that there is sufficient information to fully assess the solution.	Thank you for your comments.

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Question 9:	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**
National Grid Electricity Distribution (Distribution Network Operator)	No.	N/A
Northern Powergrid (Distribution Network Operator)	No.	N/A
SP Energy Networks (Energy Supplier)	We do not believe that there are any risks to our MHHS plans as we are already qualified	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	No.	N/A
Xoserve (Gas Retail Data Agent)	N/A	N/A

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Question 10:	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. 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**
National Grid Electricity Distribution (Distribution Network Operator)	A) Nil	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	A) Nil	Thank you for your comments.
SP Energy Networks (Energy Supplier)	We have identified no significant cost for this, as it is an offline process change.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	A) Nil	Thank you for your comments.
Xoserve (Gas Retail Data Agent)	We do not consider that there is sufficient information to fully assess the solution. As noted above, we disagree with certain aspects of the solution which will impact our response to this change with respect to the proposed scope.	Thank you for your comments.

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Question 11:	Do you identify any benefits to your business or the energy market through the implementation of the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We do not expect to be impacted by the implementation of this Change Proposal. St Clements have confirmed that there will be no impact to MPRS as alliances can be resent using PIR715 which was delivered in MPRS R8.2. We are also confident in our ability to manage CSS incidents in a timely manner.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Data alignment issues between MPRS and CSS may be mitigated.	Thank you for your comments.
SP Energy Networks (Energy Supplier)	We believe that this change will refine the existing process and ensure that there is limited exposure to DNO in terms of our DCUSA obligations and management of the payment default process.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	A reduction in registration delays due to Regulatory Alliance issues.	Thank you for your comments.
Xoserve (Gas Retail Data Agent)	We do agree that it is important that Regulatory Alliances are reflected promptly in Central Systems for the wider energy markets. We do not consider that there is sufficient information to fully assess the proportionality of this solution and the business case. As noted above, we disagree with certain aspects of the solution which will impact our response to this change with respect to the proposed scope.	Thank you for your comments.

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Question 12:	Taking into consideration both the costs and the benefits seen, do you consider this change should be made?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we have no issue with the implementation of this change.	Thank you for your comments.
Northern Powergrid (Distribution Network Operator)	Yes, we believe that there is industry benefit in monitoring alliance processing errors and ensuring a timely data update is made.	Thank you for your comments.
SP Energy Networks (Energy Supplier)	Yes.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	Yes.	Thank you for your comments.
Xoserve (Gas Retail Data Agent)	We consider that there is insufficient information to assess whether the solution proposed is likely to be effective. As noted above, we disagree with certain aspects of the solution which will impact our response to this change with respect to the proposed scope.	Thank you for your comments.

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Question 13:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	No further comments.	N/A
Northern Powergrid (Distribution Network Operator)	N/A	N/A
SP Energy Networks (Energy Supplier)	No additional comments	N/A
SSE Energy Supply Limited (Energy Supplier)	No.	N/A
Xoserve (Gas Retail Data Agent)	As mentioned above, we have concerns about the approach proposed as the solution doesn't recognise the master of the data – e.g. providing a report back (which one reads as a justification) back to CSS in the event that the message is not being resubmitted. We think that this sets a precedent that is inappropriate and is outside of the existing Service Definition response times for a matter impacting an individual User.	Thank you for your comments.

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