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01	Proposal Plan
02	Impact Assessment
03	Consultation
04	**Final Recommendation**

CHANGE REPORT

R0096 – CSS MESSAGE REGENERATION FUNCTIONALITY

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	November 2027
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Technical Expert Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	Medium	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Central Switching Service (CSS) Provider, CSS Users		

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

An inability by the Central Switching Service (CSS) to re-generate Market Messages that were not sent as intended can result in issues with the Switching process, both for REC Parties, and Consumers. This Change seeks to create a message regeneration functionality that would mitigate this Consumer detriment.

RESPONSIBLE COMMITTEE DECISION

On 25 February 2026, the Technical Expert Panel voted in line with the Code Manager recommendation to:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach of big bang; and
- **APPROVE** the proposed implementation date of the standard REC release in November 2027.

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BACKGROUND

1 SUMMARY

Since the Central Switching Service (CSS) go-live, there have been incidents where the CSS has failed to generate Market Messages, and therefore they are not delivered to the intended recipient. This results in a failure of the Switching process and can cause significant complications for the intended recipient, who is required to manually intervene to re-synchronise messages. The CSS does not currently have the ability to generate messages that were not originally created, and as such, it is currently unable to perform message synchronisation by re-generating messages.

This is a highly visible issue that is causing significant strain to industry. Additionally, as these messages pertain to Switching, as well as impact on the Energy Supplier, there is also an impact on the Consumer, resulting in a poor experience and outcome.

This Change Proposal has been raised to explore the introduction of new functionality which will allow CSS to identify and re-generate messages which have failed initial generation. For the avoidance of doubt, this Change Proposal does not include any fixes to known incidents that result in messages failing to generate but looks to introduce functionality that will address incidents as they occur for the enduring CSS operations.

2 PROBLEM STATEMENT

Failures by the CSS to generate Market Messages can result in a breakdown of the Switching process. As the CSS cannot re-generate Market Messages that should have been sent but were not, this results in message asynchronisation, and breakdown of CSS functions and processes, resulting in substantial impacts for those involved – difficulties for the REC Parties using the CSS, and difficulties for Consumers, where the Switch process is impacted.

3 IMPACTS

CONSUMERS
All

REC SERVICE PROVIDERS
CSS Provider

REC PARTIES AND SERVICE USERS
CSS Users

REC DOCUMENTS / PRODUCTS
Central Switching Service Definition

MHHS
No impacts to MHHS identified.

4 CROSS-CODE IMPACTS

The Code Manager has not identified any cross-code impacts at this stage.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**21 Jan-25**	**25 Nov-25**
	Service Provider Impact Assessment	Complete	Complete
	Solution Refinement	Complete	Complete
	Change Issues Group Discussion	Complete	Complete
	Party Impact Assessment	Complete	Complete
	Business Case Assessment	Complete	Complete
Change Proposal		**31 Dec-25**	**24 Feb-25**
	Consultation	December	January
	Final Determination	February	February
Voting		**24 Feb-26**	**25 Feb-26**
	Appeal Window	26 February	12 March

6 STAKEHOLDER ENGAGEMENT

Following the completion of the Service Provider's detailed impact assessment (DIA) and solution refinement, the Code Manager and the Technical Design Authority (TDA) engaged with the Change Issues Group (CHIG) on 06 November 2025, where it was determined that a Party impact assessment is required. The Party impact assessment was carried out between 06 November to 29 November 2025. Please see minutes to the CHIG discussion here.

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		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Aligned to planned Code Roadmap activity	2	10	20
				Overall Priority Score (rounded)	160

Priority Score	Priority Status
171 and above	Critical
151 to 170	High
101 to 150	Medium
0 to 100	Low

Priority Status	HIGH
Change Proposal Type	STANDARD

Urgent Change Proposals meet the Criteria for Urgency as set out by Ofgem

This Change has been given a priority status of Medium, based on a score of 160. This score has been calculated as follows:

- Consumer Impact has been given a priority status of two, indicating moderate impact. This is considering the Consumer detriment experienced during the P1 incident in the absence of R0096's solution, particularly around Switching, billing and trust in their Suppliers.
- Retail Risk Impact has been given a score of two, indicating moderate impact. This is because of the impact the underlying issue that this Change seeks to address has on the Switching process, which is captured under multiple Retail Risks.
- REC Party & Service Provider Operational Effectiveness & Efficiency has been given a score of two, indicating moderate impact. This is because of the potential for improvements to a key REC Service (the CSS) that can be delivered as part of the development of this Change.
- Contribution to REC Objectives has been given a score of two, indicating moderate impact. This is because of the potential for improvements to REC central systems that can be delivered by the proposed solution.
- Urgency has been given a score of two, indicating moderate urgency.

All other metrics have been given a score of zero or one, as appropriate.

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SOLUTION

8 SUMMARY OF ANALYSIS UNDERTAKEN

During the development of this Change Proposal, the CSS incurred a P1 Incident (INC0216074) resulting in Secured Active and Inactive messages relating to Consumer Switching not being issued out to Market Participants and other Parties, such as Central Services. The P1 incident impacted circa 193,000 Registrations which did not successfully progress to Secured Active Registrations,[1] and circa 9,000 Initial Registrations.[2] As a result, the end Consumers did not have their Switches fulfilled on the planned Supply Start Date. This meant end Consumers were still with their previous Supplier, and blocked from Switching again, until the incident was fixed. Although P1 incidents of this nature are required to be resolved within 4 hours, DCC reported it took 1,606 hours in this instance, significantly impacting industry Parties and end Consumers.[3] Costs incurred across industry to introduce manual interventions, data rectification, reconciliation activities, address customer-raised incidents and mobilise resources from July-August 2023 could not be accurately quantified, but were estimated to be in excess of millions of pounds.

As a result of this incident, the TDA issued a second preliminary impact assessment (PIA) to capture additional requirements which were identified following the resolution of this incident. However, following the completion of the second PIA, there was still some concern as to whether sufficient time had been provided to fully understand and incorporate the findings from the P1 incident. As such, the Change Proposal was put on hold to allow the CSS Service Provider to fully assess the P1 incident and provide an updated approach with regards to a solution.

In January 2025, the TDA issued a DIA for the CSS Provider to complete design up front. This approach, as well as the design costs, were approved by TEP that month. The design document was shared with the TDA in July 2025, and the DIA was completed on 22 August 2025. Subsequent solution refinement took place, with the final impact assessment that included all amendments issued to the TDA in October 2025.

The proposed solution takes into consideration the lessons learned and remediation recommendations that followed the P1 incident, where storage replication latency and data recovery issues were encountered and Secured Active and Inactive messages not being generated. During the review of the P1 incident, it was determined that when a transaction (e.g., a Switch) is interrupted, there is a risk that dependent message files may not be fully replicated to the recovery site. This could potentially lead to content required to generate follow-up events being unavailable upon recovery and leading to incomplete notifications. The proposed solution is designed to mitigate similar incidents, as well as any future updates to the system.

R0096 introduces a self-healing mechanism that breaks down transactions into logical checkpoints (such as state changes or log entries). If a transaction fails to reach the next checkpoint within the expected timeframe, the system detects this immediately, rolls back to the last successful checkpoint, and fixes forward in real time by generating the missing messages and sending them to Parties as soon as technically possible. This proactive approach acts as

[1] IGT UNC, IGT171 Workgroup Report
[2] DCC Major Incident Review Report
[3] RECCo, P1 Review Summary Report

an insurance policy against failed processes, improving resilience and enabling rapid recovery in the event of technical or infrastructure failures.

The proposed solution will introduce new features to the CSS, including:

- Recovery Point System (RPSys): introduces a structured mechanism for the tracking, persisting and recovering of in-progress operations. This is designed to enhance the resilience, observability, recoverability of stalled operations within the CSS and is independent to the CSS. The scope of the RPSys was defined to ensure that any Market Participant requests which either fail to start, or are interrupted, are capable of recovery from a known, consistent point.
- Workflow Tracking Ledger: this will provide information of the current workflow state and act as the durable store for all recovery points.
- Workflow Regeneration Function: CSS would be able to compare the current workflow state against desired workflow state and, if there is a mismatch, will initiate the 'Regenerate Workflow'. This acts as a self-healing system.
- A 'Failing to Resolve Ledger' has also been incorporated into the solution with the aim to provide live insight into the Workflow Ledger.

These new features will ensure all operations are capable of re-entrant recovery, not just notifications. The lack of facilities within CSS to rectify missing Market Messages was a critical cause of the extended P1 incident. Should another P1 incident occur post-implementation of R0096, minimal disruption and data loss would be incurred, ensuring continuity of operations post-recovery. In addition to targeting P1 major incidents, R0096 also seeks to future-proof CSS and takes into consideration the various REC changes and releases that have expanded the CSS architecture in the past two years.

The DCC have also provided additional information regarding P1 incidents and other incidents that would have benefitted R0096's solution. The CSS currently does not categorise incidents in a way that directly aligns with R0096's functionality, so it is difficult to provide an exact count. However, based on quantifiable evidence available:

- Since go-live, 98 standard changes have been implemented to apply data fixes for stalled Switches across various states.
- Each change typically addresses multiple stalled Switches, meaning the total number of impacted Switches is in the hundreds, at minimum.

During the DIA, it was determined that the CSS Service Provider would require approximately 90 weeks for mobilisation, building and testing of the solution. The total costs can be found in Section 12 – Business Case Assessment.

9 PROPOSED SOLUTION

Details of the proposed solution can be found in the solution document, found here.

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PRELIMINARY ASSESSMENT

10 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

10.1 SERVICE PROVIDER IMPACT ASSESSMENTS

A Service Provider DIA was issued to the CSS Provider in January 2025, and completed in August 2025. Following solution refinement, a final impact assessment all amendments was issued to the TDA in October 2025.

CSS SERVICE PROVIDER	• The DCC have provided a Detailed Design Document shared by their Service Provider, Landmark. This document provides an end-to-end view of the proposed solution and introduces a Recovery Point system that will ensure any Market Participant requests which either fail to start or are interrupted during execution are capable of recovery, permitting such requests to safely restart from a known, consistent point, thereby preserving data integrity, message order and ensuring continuity of operations post-recovery. • Due to the time lapsed between the issue of the DIA in January and its completion in August 2025, the DCC recognises that technologies, services, or architectural patterns have evolved in that time. As such, the document should be considered a baseline subject to refinement. • The Change Proposal will require updates to the CSS architecture, including dashboards, workflow and recovery logs, and a Recovery Point System. The DCC anticipates design and testing activities to require approximately 90 weeks. • Costs amount to £1,084,964.25. The build and test costs amount to £986,230.01. This is in addition to the design costs of £98,734.24, approved by TEP in January 2025. • The costs are a substantial increase from the original estimated costs provided in the first PIA (£401,477.24 - £534.477.24). This is primarily due to the time required for mobilisation, building and testing of the solution, as well as the widened scope of the Recovery Point System. • The TDA noted that this Change Proposal will provide multiple benefits that are proportionate to the costs, including removing manual interventions (which was inefficient and disruptive), improving transparency via dashboards and recovery logs, and a future-proof architecture to prevent and mitigate the effects of major incidents.

10.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was conducted from 06 November 2025 to 29 November 2025. In total three responses were received, two from Distributed Network Operators and one from the Gas Retail Data Agent (GRDA). The non-confidential responses have been published here. A summary of all responses can be found below.

DISTRIBUTION NETWORK OPERATORS	• The two respondents were supportive of the proposed solution and the proposed additions to CSS. The respondents noted that the impact of no 'retry' functionality during the P1 incident was high across the industry. The introduction of manual processes and delay in resolving the issue led to customer detriment. Respondents noted the retry functionality is key to this Change Proposal. The implementation of R0096 and its introduction of the regeneration functionality should mean that manual interventions are not required, and the relevant systems are reliable. • Neither respondent identified any additional scenarios that could be impacted through the implementation of the proposed solution. Both respondents believe the proposed solution sufficiently considered all relevant industry processes, including new MHHS arrangements. • Both respondents believe the proposed solution to sufficiently future proof CSS and mitigate the system from future major incidents. As such, they supported the implementation of this Change at the earliest opportunity. However, due to the time required for the CSS Provider to build and test the solution, the Code Manager reiterated that the Change is unlikely to be deliverable before November 2027. • Neither respondent identified any costs relating to the implementation of the Change. However, one respondent noted that if there are costs for changes to MPRS to accommodate this Change, then costs would be incurred to their business. The Code Manager has taken this into consideration; however, no changes will be required to the MPRS system as part of this Change Proposal.
GAS RETAIL DATA AGENT	• The respondent raised several points of concern and clarification needed regarding the technical solution, as well as costs of implementation and delivery. The Code Manager has engaged further with the respondent to provide further clarity on the technical questions. • The respondent did not identify any additional scenarios that could be impacted through the implementation of R0096, but believes that CSS will provide this assurance based on

	identified instances. The Code Manager engaged with the DCC to enquire more, and their response has been included under the proposed solution section of this Change Report. • The respondent did not provide any alternatives to the proposed solution as they did not identify any User impacts to it. For the same reason, the respondent did not identify lead time required for their business to implement the proposed solution, nor any constraints on when this change can be delivered. • The respondent noted that, in principle, there are benefits to their business through the implementation of R0096. However, they noted that the extent of the impacts to Consumer activities is unknown to them at this stage. • The respondent believed the costs of the change to remain unclear and required additional information to assess the Code Manager's assessment of the costs and benefits of R0096. The breakdown of the costs is found in the Detailed Design document, but can also be found below.

10.3 SUMMARY OF AMMENDMENTS MADE FOLLOWING IMPACT ASSESSMENTS

No changes were made following the impact assessments.

11 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

11.1 RISKS AND ISSUES

NO.	RISK	NOTES	MITIGATION
R01.R0096	Subsequent changes applied to CSS prior to build commencement may not be accounted for.	The Service Provider DIA only took into account the CSS architecture up to August 2025. Any CSS-impacting changes implemented as part of the November 2025 release may not have been considered as part of the DIA.	This will be considered during the start-up/initiation phases before build starts. Design documentation will also be kept up to date.

No issues have been identified at this stage.

11.2 ASSUMPTIONS AND DEPENDENCIES

NO.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A01.R0096	The implementation of R0096 would not impact the progress of any in-flight Change Proposals.		This is to be validated by the TDA and the Code Manager during the Code Manager Initial Assessment, as well as Service Provider Impact Assessment, of any in-flight Change Proposals.

No dependencies have been identified at this stage.

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12 BUSINESS CASE ASSESSMENT

12.1 COSTS

COSTS	DESIGN COSTS	BUILD AND TEST COSTS	ONGOING OPERATIONAL COSTS
CSS SERVICE PROVIDER	£98,734.24	£965,491.98	Up to £200,000 per annum

In January 2025, TEP approved for design to be conducted up front. Subject to TEP's approval of implementation of R0096, the build and test phases are broken down into start-up, build, test and deployment activities – these costs are included in the table above under build and test costs. This covers a period of 93 weeks for mobilisation, building and testing of the solution. The ongoing operational costs are estimated costs that cover the use of MS Azure Chaos.

R0096 deals with preventing and minimising the disruption to industry and Consumers of any stalls or message loss. In its current design, stalled operations within the CSS can occur due to Business Continuity and Disaster Recover (BCDR) events, dependency failures, or replication delays with Azure storage. Lost or delayed messages can create inconsistent business states, leading to financial and regulatory impact across Energy Suppliers, Networks and Consumers.

Under Ofgem's Guaranteed Standards of Performance (GSoP) programme, Consumers can be compensated £40 for a failed or delayed Switch.[4] Ofgem's original business case for the Switching Programme quantified the cost of a delayed Switch in line with the equivalent compensation payment due under GSoP (then £30, now £40), and over an 18-year period (3 years initial design, build and test (DBT) and 15 years of ongoing operation of the CSS). If we assess the costs of R0096 against the original assumptions in the Switching business case, we see a net benefit of £3.5-4 million through reduced industry costs and impacts of delayed Switches.

Should R0096 not be implemented, there is a risk that the CSS would be left exposed to potential future major failures, leading to potential widespread failed and/or delayed Switches. If these were to be of a similar magnitude to the 2023 P1 incident, where over 200,000 Switches were delayed/ failed, based upon the current GSOP compensation payment, it could result in a cost to industry of approximately £8 million. Assessing this against Ofgem's original business case for CSS, we see a net benefit of approximately £4-4.5 million from the implementation of R0096.

When the P1 major incident occurred, it impacted a combined 200,756 supply Switch messages and new Registration messages, for gas and electricity, domestic and non-domestic end Consumers.[5] Manual interventions were introduced to repair the incident, including batch updates that incrementally ensured impacted Switches and Registrations were processed by CSS, data verification and reconciliation activities carried out by DCC, REC Parties and the Switching Data Service Providers (SDSP) – spanning July to September 2023. In addition to the

[4] Impact Assessment and Consultation. In the original business case for Ofgem's Switching programme, Consumer impact was quantified with a value of £30 compensation.
[5] RECCo Major Switching Incident, Appendix A.

CSS Provider mobilising resources, other impacted Parties (e.g., the SDSPs, the central enquiry service, Shippers, Gas Transporters and Distributors) also needed to deploy resource to carry out resolution activity. This resulted in significant resource, time, and financial costs incurred. While some of these costs are proprietary and difficult to quantify due to the scope of the incident, the costs incurred are estimated to be in the magnitude of millions of pounds.

Due to the impact to Market Participants and end Consumers of future P1 incidents, and the significant changes introduced to create a more robust system, it was necessary that the testing of R0096 is stringent and effectively future proofs the CSS. While the costs of implementing R0096 are significant, they are outweighed by the financial and mobilisation costs that would be incurred if another P1 incident were to occur. R0096 not only embeds the lessons learned from the remediation activities of the P1 incident but also seeks to prevent transaction stalls and other potential Switching issues that may occur at different stages of the end-to-end Switching process. As such, it is critical that the costs for R0096 are not considered in isolation, but in the context of the comparable losses experienced across industry when R0096 was not in place.

The full business case assessment white paper has also been published on the R0096 Portal page and can be found here.

REC BUDGET APPROVAL SECURED FOR DESIGN, BUILD AND TEST	11/02/2026

On 11 February 2026, RECCo approved DBT costs for R0096. The additional ongoing costs of approximately £200,000 per annum are expected to be included in DCC's uplift for annual costs within their operating budget for 2027-28.

12.2 BENEFITS

TANGIBLE BENEFITS	BENEFITS DESCRIPTION
QUICKER ISSUE IDENTIFICATION AND RESOLUTION	The implementation of this Change Proposal will introduce a self-healing mechanism that breaks down transactions (e.g., a Switch) into logical checkpoints (such as state changes or log entries). This will ensure that the system automatically detects if a transaction fails to progress and regenerate messages experiencing a stall. R0096 considers lessons learned from the long period of time to resolve the P1 incident, costs incurred across industry and end Consumers to build robust, proactive mechanisms to faster identify and resolve issues. This should improve CSS' overall resilience in the event of technical or infrastructure failures. The implementation of this Change Proposal would also allow CSS to automatically recover from any future major incidents, reducing the likelihood of industry impacting incidents from "probable" to "highly improbable".
COST SAVINGS FOR MARKET PARTICIPANTS AND CONSUMERS	The proposed solution and approach will remove the need for manual reprocessing of failed transactions and prevent costly disruption to Market Participants and their Consumers. It has been quantified by the CSS Provider that, in line with appropriate activities for incident management, problem management and overall resolution, the cost associated with resolving stalled, corrupted, or lost messages is £1000 per message. This is proportional to the number of messages impacted by the incident and the resultant issue magnitude. During the P1 incident, costs incurred by Market Participants during the reconciliation and remediation activities were significant and in excess of millions of pounds. The Consumer detriment that resulted from the P1 included preventing their ability to set up direct debits, Non-Domestic end Consumers pushed onto higher deemed contract rates, and some prepayment end Consumers were also accidentally taken off their Supply. Should R0096 not be implemented, the CSS would be left exposed to potential subsequent major failures, leading to potential widespread failed and/or delayed Switches. If these were to be of a similar magnitude to the P1 incident in 2023, where over 200,000 Switches were delayed/ failed, based upon the current GSOP compensation payment, it could result in a cost to industry of approximately £8 million. The implementation of R0096 should help eliminate the risk of major Market Participant impact and, should another major incident occur, R0096 would prevent costly disruption to end Consumers.

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
REDUCED MARKET DISRUPTION	The implementation of this Change Proposal will minimise disruption to Market Participants in the event that CSS Operations stall. The Change Proposal introduces built-in resilience mechanisms that will ensure that the CSS Operations can either continue seamlessly or be recovered swiftly to a known state with minimal impact. This will also remove the need for manual intervention, which was introduced in response to the P1 incident.
IMPROVED TRANSPARENCY	The implementation of this Change Proposal will improve transparency around CSS Operations by introducing near real-time dashboards and reporting, as well as recovery logs. This will provide more operational transparency to internal and external support teams, ensuring improved monitoring of the performance and reliability of the proposed Recovery Point system. This will support faster identification and resolution of incidents, enhancing both market responsiveness and the effectiveness of CSS.
FUTURE PROOFING CSS TO MITIGATE FUTURE INCIDENTS	The proposed solution reflects two years of system evolution, as well as lessons learned from the P1 incident. Noting the system failure and data losses during the P1 incident, the proposed solution would be built to enhance business continuity by enabling CSS operations, such as registrations and event notifications, to be safely paused and resumed without starting over. In addition to resilience and mitigation mechanisms introduced to respond to future incidents, the proposed solution also prioritises scalability and future updates to the CSS architecture.

12.3 COST BENEFIT ANALYSIS

The Code Manager believes the cost and effort of implementing this Change Proposal are proportionate to the benefits provided by the proposed solution.

The implementation of this change will provide a more resilient design to the CSS, introducing a Recovery Point System within the CSS Registration capability. The costs incurred primarily relate to the building and testing phase of the solution, as well as the expanded scope and resilience features of the solution. Due to the comprehensive testing required to ensure a robust system, the Service Provider has estimated 93 weeks to cover mobilisation, building and testing of R0096.

In contrast, the benefits are substantial. The change will reduce market disruption by introducing a mechanism for the automatic recovery of stalled workflows and minimise the need for manual reprocessing. Where the current solution to stalled workflows is manual and post-event, R0096 would allow for proactive identification and resolution. The self-heal functionality of the solution would identify and fix stalled workflows before impact. The implementation of this change will ensure continuous monitoring coverage and create a future-proof architecture to

mitigate the events of similar P1 incidents. Overall, the benefits outweigh the costs, making this a cost-effective and strategically valuable change.

13 CASE FOR CHANGE

SELF GOVERNANCE

The Code Manager considers there is a positive case for change for implementing this Change Proposal on the basis that the proposed solution:

- The proposed solution appropriately resolves the original Problem Statement;
- The cost and effort of implementing and operating the proposed solution is proportionate and cost-effective;
- The impact of the Change Proposal not being implemented may cause detriment to Market Participants and Consumers; and
- The proposed solution delivers positive outcomes for Consumers and efficiencies in the operation of the retail energy market. Once implemented, R0096 will prevent any similar P1 incidents in the future causing significant cost to industry and Consumer detriments.

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14 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 17 December 2025 to obtain views on the Change Report (For Consultation). In total four responses were received from two Distribution Network Operators, and two Energy Suppliers.

The key themes from these responses have been summarised and set out below. The non-confidential responses have been published here.

14.1 SUMMARY OF RESPONSES

Three of the four respondents were supportive of the Change Proposal and proposed solution, and believed it should be implemented. One DNO respondent caveated that although they were supportive of the change, they would be minimally impacted. One Energy Supplier raised concerns about the associated costs of integrating R0096's solution into CSS, particularly given the financial impact borne on Consumers. These concerns have been integrated into the revised Section 12 Business Case Assessment.

One Supplier noted the importance of addressing the message regeneration issue within CSS, however raised queries around alternative solutions considered and the high costs and high operational impact of R0096. The respondent was not supportive of the proposed implementation of big bang nor the implementation date, and disagreed with the Code Manager's assessment of costs and benefits for this change. Given the significant upfront and ongoing costs that would ultimately be passed through to the Consumer, the respondent requested further review of the business case and careful planning.

In response to the feedback provided, the Code Manager engaged further with the TEP, RECCo and the DCC to build the business case assessment and clarify risks, financial costs, and benefits of R0096.

14.2 COMMENTS ON THE SOLUTION

Three of the respondents agreed with the proposed solution of this change. One respondent noted that given the impact of stalled messages on industry, the solution was appropriate.

One respondent raised queries around the design of the Recovery Point System (RPSys) and the risks associated with introducing the system in parallel with other significant changes being made to the core of the CSS. The respondent noted that that R0096's proposed solution would strengthen the overall operational resilience of CSS, but seems to only be a supportive solution to the known scenario of geo-replication for asynchronous Blob replication.

The TDA responded with clarification that the R0096 solution was the result of extensive consultations with Microsoft to address the Blob replication issue and addresses a wider scope than just this issue. In addition to introducing resilience improvements to the CSS to ensure that messages are processed quickly and accurately, and delivered to recipient users, R0096 also seeks to ensure any downstream impact to CSS Users is mitigated as far as possible. R0096 looks beyond the failed Registrations that led to the P1 incident in 2023, to mitigating the impact of stalled messages sent within the CSS. The mechanisms introduced by R0096 means there are validation checks at every point of the message being processed, automatically checking

the state of the message and acting as a failsafe for all regeneration issues. This is not specific to regeneration only, but also considers Agent appointments, Change of Shipper requests and Alliance changes.

14.3 BENEFITS RELATIVE TO IMPLEMENTATION AND OPERATIONAL COSTS

The two DNO respondents agreed with the Code Manager's assessment of the costs and benefits for this change, with one caveating that they had no view on the costs as there is no impact on DNOs in terms of this change.

One Supplier agreed with the Code Manager's assessment of the benefits of the change, but raised concerns about the associated costs and requested that they be revised downwards. The respondent was particularly concerned about the assurance of the costs, given that they would ultimately be incurred by the Consumer during a time of renewed, industry-wide focus on Consumer bills. Similar, the other Supplier respondent noted that R0096 presents significant upfront and ongoing costs for industry.

The Code Manager responded with clarification on how the technical validity of the solution was assessed and where costs were reduced, as appropriate. The latter includes reducing the start-up phase time and FTE costs. The timelines for development and implementation considers that some of the planning and design was approved up-front in January 2025, and the cost of approximately £900,000 allocated for build and testing is unlikely to change substantially once approved.

14.4 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

All respondents agreed with the Code Manager's assessment of the Change Path and that this Change Proposal should be subject to Self-Governance approval by the TEP.

Three of the respondents supported the case for change and the Code Manager's recommendation to TEP for approval of this change. One respondent advised further review of the case for change and did not support the Code Manager's recommendation, noting that the implementation date was too soon and further assurance of the solution was required.

14.5 IMPLEMENTATION DATE AND APPROACH

Three of the respondents agreed with the Code Manager's recommendation that this Change Proposal should be approved for implementation on the standard REC release in November 2027. One DNO noted that the implementation should take place as soon as possible once all required works have been completed, along with the appropriate testing.

One Supplier disagreed with the implementation as too soon for such a significant change to the core of CSS, raising concerns that careful planning and testing was required to prevent a similar P1 incident occurring. The Code Manager responded that waiting longer to implement a change would not reduce the risk of R0096's implementation – rather another DIA may be required to account for the longer lead time. R0096's proposed solution considers the lessons

learned not only from the P1 incident in 2023, but also other CSS-impacting changes over the last two years.

15 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

Following the consultation, the Code Manager, the TDA and RECCo engaged further with the TEP to discuss the business case for R0096. Feedback provided during the consultation as well as by TEP have been integrated into this Change Report, particularly under Section 12 Business Case Assessment.

No changes were made to the solution itself, nor the Code Manager's recommendation.

DOCUMENT	SECTION	AMENDMENT	REASON
R0096 Change Report (Final Recommendation)	12 Business Case Assessment	Added quantified harm to Consumers and an assessment against Ofgem's original business case for the Switching programme.	Following engagement with the TEP and RECCo, the Code Manager reviewed the business case for R0096 to better quantify the harm to Consumers if the proposed solution were not to be implemented.

16 APPENDIX

CHANGE PROPOSAL	Link
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
CONSOLIDATED CONSULTATION RESPONSE	Link
DETAILED DESIGN DOCUMENT	Link
RECCO MAJOR INCIDENT REVIEW REPORT: P1 - REF INC0213074 - CSS JULY 2023	Link
RECCO MAJOR SWITCHING INCIDENT – APPENDIX A – DETAILED REPORT	Link
IGT UNC WORKGROUP REPORT – IGT171: SETTLEMENT ADJUSTMENTS FOR SUPPLY METER POINTS IMPACTED BY THE CENTRAL SWITCHING SYSTEM P1 INCIDENT	Link
R0096 – BUSINESS CASE ASSESSMENT WHITE PAPER	Link
OFGEM'S SWITCHING PROGRAMME – IMPACT ASSESSMENT	Link
OFGEM'S SWITCHING PROGRAMME – FULL BUSINESS CASE	Link

17 GLOSSARY

TERM	DEFINITION
Central Switching Service	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.

CSS User	means each organisation which is Qualified to use the CSS, together with each Switching Data Service Provider (other than the CSS Provider) the categories of which are set out in the Central Switching Service Schedule.
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
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.
Service Definition	means each document of that name forming part of the Technical Specification.
Switch	means a change to the Registered Supplier for an RMP.
Synchronisation Message	means a type of Market Message, as described in the Switching Data Management Schedule.