RETAIL ENERGY CODE

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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	TBD
IMPLEMENTATION APPROACH	TBD

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.

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BACKGROUND

1 SUMMARY

Since the 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 DESIGN
N/A

MHHS DATA SPECIFICATION
N/A

MHHS CODE DRAFTING
N/A

The impact on Switching means that Consumers are directly affected by this Change. Additionally, there is an impact on both the CSS Provider, as this Change directly refers to CSS architecture and systems, with a resulting impact on CSS Users.

Changes are likely to be centred on the CSS Definition document, but this assumption may be subject to change, as the solution is refined following impact assessment.

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**
	Impact Assessment	**Complete**	**Complete**
	Solution Refinement	**Complete**	**Complete**
	Change Issues Group Discussion	November	November
	Party Impact Assessment	November	December
	Business Case Assessment	November	December
Change Proposal		**31 Dec-25**	**24 Feb-26**
	Consultation	December	January
	Final Determination	February	February
Voting		**25 Feb-26**	**25 Feb-26**
	Appeal Window	26 February	12 February

6 STAKEHOLDER ENGAGEMENT

In January 2025, this Change was discussed extensively at the Technical Change Workshop operated by the Code Manager. This forum enabled an iterative solution development process, yielding a complete proposed solution that is currently under impact assessment with the CSS Provider.

The TDA then issued a DIA for the CSS Provider to complete design up front. This approach was approved at TEP in January 2025. 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. During the DIA, it was determined that the CSS Service Provider would require approximately 90 weeks for mobilisation, building and testing of the solution.

This Change was taken to the CHIG on 06 November 2025 to provide industry with an update on the proposed solution, and determine whether a Party impact assessment is needed, or whether this Change Proposal can proceed straight to consultation. The proposed solution has been refined, and an updated cost estimate was provided that would require detailed discussions and agreement on further steps with the CHIG. Parties requested a Party impact assessment to review the technical design document provided by the CSS Provider.

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	1	27	27
	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)	133

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

Priority Status	MEDIUM
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 133. This score has been calculated as follows:

- 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 PROPOSED SOLUTION

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

9 APPENDIX

CHANGE PROPOSAL	Link
PROPOSED SOLUTION	Link

10 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.