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

CHANGE REPORT

R0178 – IMPROVEMENTS TO CSS BUSINESS PROCESS LOGIC

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	25 June 2027
IMPLEMENTATION APPROACH	BIG BANG

RESPONSIBLE COMMITTEE	TECHNICAL EXPERT PANEL	**CHANGE PATH**	SELF-GOVERNANCE
PRIORITY STATUS	LOW	**URGENCY**	STANDARD
IMPACTED STAKEHOLDERS	Energy Suppliers, Distribution Network Operators (DNOs), Gas Transporters (GTs), Data Communications Company (DCC)		

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

This Change Proposal is aimed towards rectifying a collection of issues and scenarios that were identified with the CSS Business Process Logic:

1. Deactivation of an active Registration whilst in-flight Switch in progress
2. Deactivation of a prior cancelled Registration
3. OFAF Switch containing multiple MPxN

CODE MANAGER MINDED-TO-POSITION

The Code Manager's minded-to-position is that the REC Technical Expert Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 26 June 2027.

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BACKGROUND

1 SUMMARY

Previous REC Change Proposal R0153 – Catering for Registration Events sought to resolve the issue for Registration events where the incumbent Energy Supplier deactivates prior to a Switch becoming effective. An investigation between the Code Manager and the Service Provider was held into the requirements of R0153 which resulted in other issues with the CSS Business Process and Logic being identified. Consequently, it was decided that R0153 be withdrawn and incorporated into this new Change Proposal that is aimed towards rectifying the collection of issues that have been identified with the CSS Business Process Logic.

Three issues have been identified and are as follows:

1) Deactivation of an Active Registration whilst in-flight Switch in progress

There are instances where the incumbent Energy Supplier is withdrawing prior to the 'Supply Effective from Date', causing the accepted Switch to fail at Gate Closure which occurs at 17:00hrs.

This creates the scenario in which there is no longer a Losing Supplier for the Consumer to Switch from, and therefore the Switch process stalls and cannot be progressed. This has a direct impact on Consumers who have a Switch Request which has already been accepted but the CSS is not able to progress further as the Switch process stops.

There has been a total of 82 missing messages observed since 01 January 2023, of which 66 messages have been related to Switches where there was no registered Energy Supplier recorded at Gate Closure.

The 30 September 2023 Gate Closure was particularly impacted by this scenario and resulted in 45 Registrations which did not become effective on 14 October 2023 as planned.

It should also be noted that 01 October is one of the key contracting dates for large Industrial and Commercial (I&C) consumers, consequently increasing the impact to Consumers in this instance.

2) Deactivation of a prior cancelled Registration

This scenario occurs when the registered Energy Supplier of an MPxN (via the active Registration) is the same Energy Supplier that cancelled a previous Switch for the same MPxN. In this case there is the possibility that the Energy Supplier could attempt to deactivate the active Registration by accidentally providing the cancelled Registration identifier.

Currently, the CSS still accepts the deactivation request and erroneously changes the cancelled Registration state from cancelled to inactive, sending out a secured Inactive message.

Currently, after an MPxN is disconnected, the Energy Supplier is required to submit a deregistration request to the CSS. Therefore, there is a possibility that the Energy Suppliers could submit this request for a cancelled Registration and not an active Registration. The CSS would still accept this request as the Business Data Validation Rules (BDVR) lack coverage of this case; in such cases the Energy Supplier may incorrectly believe that they have deregistered the MPxNs.

3) One Fail All Fail (OFAF) Switch containing multiple MPxNs

This is the instance where the end user sends through a One Fail All Fail (OFAF) Switch with the same MPxN contained within the payload two or more times. Multiple Registration IDs are created for the same MPxN, and the Registration is left in an incorrect state given a lack of appropriate BDVRs.

Indeed, there has been a further reported incident regarding an OFAF transaction of the same MPxN. The primary MPxN was associated with a secondary MPxN and therefore two Registrations were created for the primary and secondary MPxN, equating to four Registrations in total. There was then an Objection raised but this only cancelled one of the two Registrations for each MPxN. The remaining two Registrations proceeded through Gate Closure.

2 PROBLEM STATEMENT

Deactivation of an active Registration whilst in-flight Switch in progress:

There are instances where the incumbent Energy Supplier is withdrawing prior to the 'Supply Effective from Date', causing the accepted Switch to fail at Gate Closure which occurs at 17:00hrs. This creates the scenario in which there is no longer a Losing Supplier for the Consumer to Switch from, and therefore the Switch process stalls and cannot be progressed. This has a direct impact on Consumers who have a Switch Request which has already been accepted but the CSS is not able to progress further as the Switch process stops.

Deactivation of a prior cancelled Registration:

This scenario occurs when the registered Energy Supplier of an MPxN (via the active Registration) is the same Energy Supplier that cancelled a previous Switch for the same MPxN. In this case there is a possibility that the Energy Supplier could attempt to deactivate the active Registration by accidentally providing the cancelled Registration identifier.

OFAF Switch Containing Multiple MPxN

This is the instance where the end user sends through a One Fail All Fail (OFAF) Switch with the same MPxN contained with the payload two or more times. Multiple Registration IDs are created for the same MPxN and the Registration is left in an incorrect state given a lack of appropriate BDVRs.

3 IMPACTS

CONSUMERS
All Consumers

REC SERVICE PROVIDERS
DCC (and DCC's Service Providers)

REC DOCUMENTS / PRODUCTS
Business Data Validation Rules (BDVR)

REC PARTIES AND SERVICE USERS
CSS Users
Energy Suppliers

All Consumers (Gas and Electricity) will be directly impacted by this Change Proposal as it relates to their ability to Switch Energy Suppliers. This impact is specifically related to the issue of 'Deactivation of an active Registration whilst in-flight Switch in progress'.

Energy Suppliers will be impacted as this change would ensure that Energy Suppliers provide the correct Registration during deactivation.

CSS Users will be impacted by multiple issues raised as part of this Change Proposal, as this change would mean that the Switch Requests would still be completed regardless of whether there was a Losing Supplier, and, as the Change would prevent multiple occurrences of the same MPxN within the payload of an OFAF Switch.

The Data Communications Company (DCC), and their Service Providers, will also be impacted by multiple issues raised in this Change Proposal, including:

- Ensuring that Switch Requests are completed regardless of whether the incumbent Energy Supplier has withdrawn prior to the 'Supply Effective Date';
- ensuring deactivation requests are properly processed and based on the correct Registration; and
- ensuring that there are no issues with multiple MPxNs being involved in OFAF Switches.

3.1 ASSESSMENT AGAINST MARKET-WIDE HALF HOURLY SETTLEMENT

There is no impact to, or from, MHHS for this change that has been identified.

4 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**06 Jun-24**	**31 May-25**
	Solution Analysis	**Completed**	**Completed**
	Solution Development	**Completed**	**Completed**
	Legal Review	**Completed**	**Completed**
	Impact Assessment	**Completed**	**Completed**
Change Proposal		**01 Jun-25**	**23 Jun-26**
	Solution Refinement	**Completed**	**Completed**
	Business Case Assessment	February 2026	March 2026
	Consultation	March 2026	April 2026
	Final Determination	May 2026	June 2026
Voting		**24 Jun-26**	**24 Jun-26**
	Appeal Window	25 June	09 July

Whilst further solution analysis took place, R0178 was placed on hold, as agreed with the REC Technical Expert Panel. As part of this Change Report (For Consultation), the REC Code Manager proposes to take this Change Proposal off hold and has provided the Proposal Plan for the remainder of the Change Proposal and Voting stages.

5 PRIORITY STATUS AND URGENCY

Category	Significance / Resource impacts / Urgency	Further selection / breakdown	Score (0-3)	Weighting	Weighted Score
Impacts	Consumer Impact	Direct	1	27	27
	Retail Markets Impact	Innovation and Market Arrangements	1	17	17
	RECCo / REC Party / REC Service Provider Impact	Operational Effectiveness and Efficiencies	1	7	7
		Legal and Regulatory Compliance	0	14	0
Resource	Complexity / Effort / Duration		1	9	9
Strategic Alignment	Contribution to/ Alignment with the objectives of the REC		1	17	8
	Contribution to/ Alignment with RECCo's Forward Work Plan		0		0
Urgency *(The need to progress a change to meet a targeted date)*		Other Planned Activity	1	10	10
				Overall Priority Score (rounded)	78

Priority Status	LOW
Change Proposal Type	STANDARD

This Change Proposal has been deemed a standard Change Proposal with a low priority status and an overall priority score of 78.

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SOLUTION

6 SUMMARY OF ANALYSIS UNDERTAKEN

Extensive solution analysis was undertaken as part of the original R0153 Change Proposal, which identified three known issues with the CSS Business Process logic with R1078 being subsequently raised incorporating these issues. Once R0178 had been raised, further extensive solution analysis has been conducted on possible solution options via Technical Change Workshops (TCWs), Change Issues Group discussions, and the Service Provider and Party impact assessments.

Following solution requirements being set via TCWs, R0178 progressed through the standard REC impact assessment process, during which the Service Provider and other impacted stakeholders assessed the nature, scale and feasibility of addressing the known CSS issues. The impact assessments confirmed that the defects in CSS processing behaviour were continuing to cause Switching issues and Consumer detriment. The analysis shows there were two potential solution options, either a costly, technical, system-based fix, or a manual, operational mitigation with supporting guidance documents from the Code Manager. Although both options were analysed and discussed, the impact assessment responses demonstrated that only the technical solution would fully resolve the issues and increase resilience within the CSS.

The analysis and output from the impact assessment were presented to the REC Change Issues Group for further industry consideration due to concerns about the difficulty and high cost associated with a technical solution. During the Change Issues Group discussions, stakeholders expressed dissatisfaction with the initial direction of the proposed solution, specifically questioning whether the proposed approach would sufficiently prevent the issues recurring, or merely reduce the likelihood of the issue occurring.

The Change Issues Group strongly expressed the following points:

1) The issues had persisted within the CSS for several years and unless resolved, would continue to generate Consumer harm and cross-Party operational effort.
2) Industry requires a definitive solution, rather than a manual workaround, to ensure the CSS could manage these scenarios accurately and consistently.

Impacted stakeholders continued to express their view that the Change Proposal should still proceed, rather than being withdrawn, but asked the Code Manager to review both technical and non-technical solutions further. As a result of this feedback, the proposed solution and approach was taken back to the TCW for further assessment.

The Change Proposal was reworked via a subsequent TCW meeting. Attendees of the TCW revisited the impact assessments and the refined solution options, including one technical and one non-technical solution option. The summary of this analysis can be seen in the table below:

	Option 1 – Full Technical Solution	Option 2 – Minimal Manual Workaround
Cost/Effort	Higher implementation costs (c.£286k), via a one-off payment to implement. No ongoing operational costs.	Low implementation effort, and minimal operational costs, but relies on effort of Parties to identify and manage exceptions.
Resolution	Permanently resolves the root-cause defects and removes recurring manual investigation effort.	A manual workaround would not remove the known defects, placing continued operational burden on impacted stakeholders.
Consumer Impact	The technical solution would minimise Consumer detriment and provide an improved Consumer Switching experience.	A workaround solution would continue to provide Consumer risk and detriment.
CSS Resilience	The technical solution would deliver significant system resilience benefits.	A workaround solution would see no improvement in CSS resilience.

Following this analysis, the TCW recommend that the technical solution should be progressed as it is the only option that can genuinely address the known vulnerability and prevent any reoccurrence of the known scenarios and issues.

The outcome of the TCW, and the revised technical solution, was presented to the November 2025 Change Issues Group. In this meeting, despite the higher implementation costs associated with the full technical solution, stakeholders including Energy Suppliers, DNOs and the DCC, expressed a clear preference for the technical solution based on the following rationale:

- The technical solution would permanently stop the issue, rather than providing mitigation via a manual workaround that came with associated risk;
- There would be further strengthening of CSS resilience;
- Consumer detriment would be reduced as the solution would ensure more reliable, timely and accurate Switching; and
- Removes the operational effort of manual exception handling, cross-Party investigations, and complaint handling ensuring longer term market efficiency and lower additional operational costs.

The discussion at Change Issues Group, in addition to the other pieces of analysis, showed that the technical solution for R0178 is capable of removing the root-cause defect, strengthening CSS resilience, protecting Consumers from disrupted Switches, eliminating recurring operational workload, delivering sustained efficiency benefits across the market, and aligning with the direction and preferences consistently expressed by stakeholders throughout the change process.

The meeting minutes, papers and slides from the November 2025 REC Change Issues Group meeting can be found, here.

7 PROPOSED SOLUTION

Deactivation of an active Registration whilst in-flight Switch in progress

As mentioned previously, the 'Deactivation of an active Registration whilst in-flight Switch in progress' issue did have an existing REC Change Proposal raised (R0153) and therefore is further along the discussion process compared to the other two issues identified.

Initial discussion outlined that the most appropriate solution for this Change Proposal should consider the business needs and the desired outcomes. It was noted that from a business perspective, if the Switch has already been accepted, then it should still go through and not be cancelled. Therefore, the following points were raised:

- It was acknowledged that there are multiple solution options/approaches that could potentially be employed to resolve this issue. As such, and to avoid being overly prescriptive, it is requested that the CSS provider investigate all possible options and outline their recommendation for the most suitable approach, which would be developed/progressed further through subsequent impact assessments.

- However, the aim is for an effective solution to be developed which would ensure that the Consumer is Switched using the original effective date and that the CSS systems could cater for such Registration events whilst following the normal Gate Closure processes.

- Where possible, the solution should also look to proactively mitigate the impact of this scenario, as opposed to working on a retrospective basis which can lead to the issue persisting over an extended period of time.

It was also noted that consideration would need to be given to the state of the meters as this would also have an impact on whether Switches are able to progress: Therefore, the following points were raised:

- The solution would need to consider how the incumbent Energy Supplier has deactivated the meter and whether it has been moved to a 'Terminated' state or a 'dormant' state.

    - Dormant – The meter is inactive. Note that this is a temporary state and therefore the meter could be put back into service.
    - Terminated – The meter has reached end of life and cannot be reinstated. Note that this is a permanent state.

- If the incumbent Energy Supplier has moved the meter into a 'Terminated' state, the in-flight Switch would then need to be cancelled.

- However, for the 'dormant' state, the following two options would be available in terms of what could happen to the status of the meter and thus the in-flight Switch:

    - Moves from 'inactive' to 'active' (continue with the Switch)
    - Moves from 'inactive' to 'cancelled' (cannot continue with the Switch)

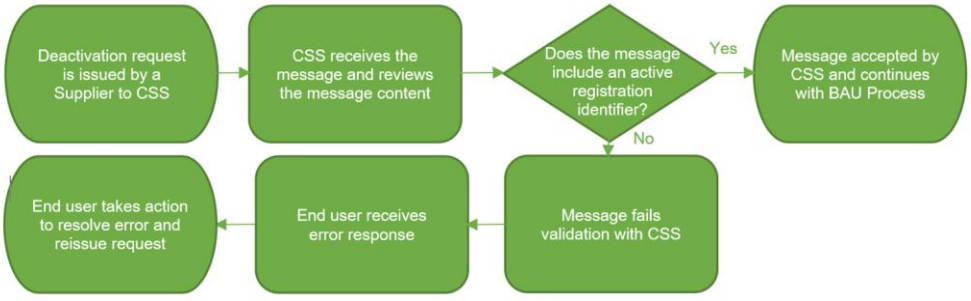
This resolves scenarios where the incumbent Energy Supplier is withdrawing prior to the "Supply Effective from Date". This is causing the accepted Switch to fail at Gate Closure at 17:00hrs. The BDVR rules here will be codified to ensure that the appropriate action is taken depending on RMP Status and whether the Switch should indeed continue or not.

Deactivation of a Prior Cancelled Registration

The solution for this has been formed as part of the Service Provider impact assessment. However, as part of the stakeholder engagement with the TCW, the following requirements and success criteria has been set.

REQUIREMENT	SUCCESS CRITERIA
Energy Suppliers to have their deactivation request fail Validation if a cancelled Registration identifier is used.	• A registered Energy Supplier of an MPxN is unable to use a cancelled Registration identifier to change the Registration state. • CSS has a Validation rule(s) in place to monitor all deactivation requests which are received into its system. • The validation rule specifies that an active Registration identifier must be used in order for a deactivation request to be accepted and processed.
Energy Suppliers to be notified that their deactivation request has failed Validation due to a cancelled Registration identifier being used.	• CSS identifies that the Energy Supplier has issued a message using a cancelled Registration identifier using message Validation rules and rejects the message. • The registered Energy Supplier receives the appropriate message rejection code.

The solution to this is detailed in the diagram below:



This proposed solution resolves scenarios where the registered Energy Supplier of an MPxN is the same Energy Supplier that cancelled a previous Switch for the same MPxN. The Energy Supplier might accidentally deactivate the active Registration using the cancelled Registration identifier. CSS currently accepts this request but is erroneously changing the cancelled Registration state to inactive and sending out securedInactive messages.

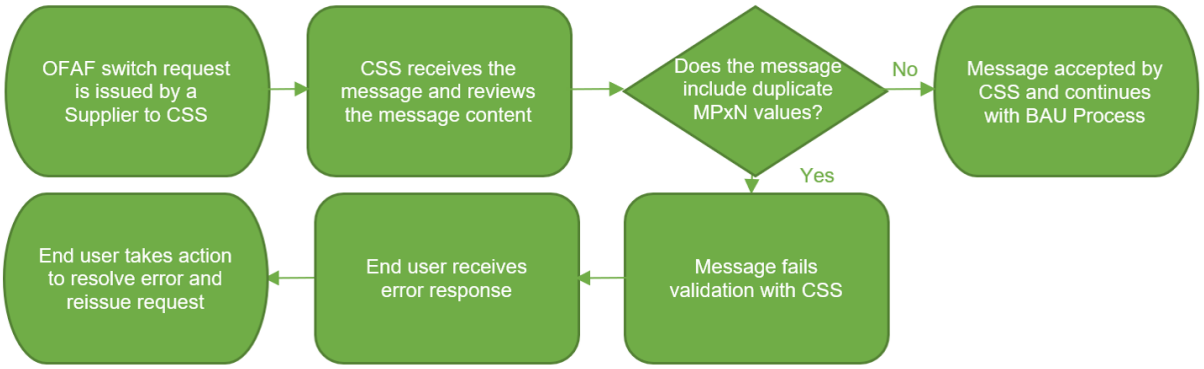
Registration state is erroneously changed to inactive, therefore ensuring that Switches are more reliable.

OFAF Switch Containing Multiple MPxN

The solution for this has been formed as part of the Service Provider impact assessment. However, as part of the stakeholder engagement with the TCW, the following requirements and success criteria has been set.

REQUIREMENT	SUCCESS CRITERIA
Energy Suppliers have their OFAF Switch Request to fail Validation if the same MPxN is used within the payload 2 or more times.	• CSS has a Validation rule(s) in place to monitor all OFAF Switch Requests which are received into its system. • The Validation rule specifies that a OFAF Switch Request must not have any duplicate MPxNs used within the payload. Each MPxN must be unique.
Energy Suppliers to be notified that their OFAF Switch Request has failed Validation due to duplicate MPxNs being used within the payload two or more times.	• CSS identifies that the Energy Supplier has issued a OFAF Switch Request using duplicate MPxNs using its message Validation rules and rejects the message. • The registered Energy Supplier receives the appropriate message rejection code detailing the MPxN which has been duplicated.

The solution is detailed in the diagram below:



This resolves issues where the end user sends through a One Fail All Fail (OFAF) Switch the same MPxN contained within the payload two or more times. Multiple Registration IDs are then created for the same MPxN, and the Registration is left in an incorrect state given a lack of appropriate BDVRs.

8 DRAFT LEGAL TEXT

This Change Proposal would include changes to the BDVRs that would support a more robust CSS that correctly handles edge-case scenarios (Dormant/Terminated meters, cancelled identifiers, OFAF duplicates) and strengthens industry trust in the Switching processes. The required drafting, that would incorporate the requirements mentioned in section 7 of this Change Report, to the BDVRs would not be known until the solution design and build has been completed, post-approval of the Change Proposal.

As the BDVR is a Category 2 REC Document, the necessary legal text amendments would be delivered through a separate Change Proposal. This subsequent proposal would be raised after the approval, design, and build phases of R0178 and progressed in line with the standard procedure for implementing technical changes ahead of an R0178 implementation.

PRELIMINARY ASSESSMENT

9 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

9.1 SERVICE PROVIDER IMPACT ASSESSMENTS

As the CSS Provider, the DCC completed a series of Service Provider impact assessments as part of the Change Process. A summary of these assessments is included below.

DCC (AND DCC SERVICE PROVIDERS)	• The Service Provider confirms the proposed changes are deliverable but highlights significant testing, design, and build effort driven by revised testing approaches, lessons learned from R0080, and technical updates such as new message content for duplicated MPxNs. They outline costed phases from design through to deployment and provide detailed assumptions related to testing environments and error handling. • The Service Provider stresses that Scenario 3 may involve an unlimited number of MPxNs and requires new message content, while cost differences between DIA versions are attributed to indexation and updated testing requirements as a result of lessons learned experienced under previous technical releases. The Service Provider notes no immediate concerns but aligns testing changes to recommendations from R0080 lessons learned. • The Service Provider noted that this change will require design, build, and multi-phase testing activity, with impacts driven by shifts in testing strategy (e.g., removal of UIT, addition of NFT) and the need for updated Validation rules and message types. It should be noted that updates may also affect BDVR, error codes, and simulator behaviour. • Estimated cost of £185,579.88 across design, build, testing, and deployment, with some costs being absorbed into within existing resource models and estimates additional testing and environment uplift activity. Benefits expected include reductions in service desk tickets and resolution times. • Key risks include dependence on controlled test phases, the potential need for new error codes or message types, and cost or timeline changes if any of noted assumptions prove false. There is also a dependency on accurate, approved requirements for design initiation and on BDVR updates and simulator changes.

9.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was conducted from 17 April 2025 to 12 May 2025. In total two responses were received from Xoserve and a DNO.

A summary of the responses is included below.

DISTRIBUTION NETWORK OPERATORS	• The DNO supports the proposed solution but is strongly concerned about the 43-week delivery timeline, which they view as excessive. They highlight that the timeline could impact I&C contracting date, reducing the solution's effectiveness. • The respondent noted that they expect no technical or system impacts, as no system changes are required. The main impact is operational improvement through fewer incidents to triage. • Costs are expected to be nil, as the DNO does not need to modify their systems. Benefits include reduced incident volumes and improved resource efficiency. • The DNO accepts the approach but believes the implementation timeline is too long and risks missing key industry milestones. The respondent believed that this delay could prolong Consumer detriment and undermine the purpose of the change. • No specific RAID was highlighted by the respondent, but they noted their inability to support testing due to MHHS resource constraints.
XOSERVE	• Xoserve noted that they cannot meaningfully assess the proposed solution due to insufficient detail, particularly for Scenario 1, which most affects their GRDA and GES services. They therefore did not comment on impacts, costs, benefits, risks, or timelines until clearer design information is provided. Xoserve stated that further solution clarity would be required.

10 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

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

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11 BUSINESS CASE ASSESSMENT

11.1 COSTS

COSTS	DESIGN/ DEVELOPMENT/BUILD COSTS	TEST AND DEPLOYMENT COSTS	ONGOING OPERATIONAL COSTS	TOTAL
PARTIES	£0	£0	£0	£0
SERVICE PROVIDER	£116,432.89	£169.246.99	£0	£285,679.88

11.2 BENEFITS

Whilst the wider, intangible benefits of this Change outweigh the direct financial impacts, the measurable tangible economic benefits are still noteworthy. Analysis of the impacted Switches data, whereby each affected Switch for each of the three scenarios will have required a minimum Guaranteed Standard of Performance (GSOP) payment of £40 to the Consumer, indicates the following costs could have been avoided if the proposed solution for R0178 was in place at the time impacted Switches were attempted:

	Number of Switches Impacted to date	Total GSOP Payment to date
Scenario 1	156	£6240
Scenario 2	10	£400
Scenario 3	19	£760
Total	**185**	**£7400**

R0178 delivers a critical resilience enhancement to the CSS addressing a known vulnerability that continues to generate Switching issues and Consumer detriment. While the directly quantifiable GSOP savings since CSS go-live (£7,400) are modest when compared with the £286k implementation cost, this figure represents only Consumer compensation and excludes the substantially higher operational burden placed on Energy Suppliers, the DCC, and the REC Code Manager. Each affected Switch drives manual exception management, cross-Party investigation, and additional Consumer contact, introducing avoidable FTE effort across the market.

TANGIBLE BENEFITS	BENEFITS DESCRIPTION
REDUCTION IN GSOP PAYMENTS	By preventing Switching issues linked to the known CSS vulnerability, R0178 reduces instances where Consumers are eligible for GSOP compensation. Although previous GSOP payments (£7,400) are modest, eliminating these failures removes a recurring financial and operational obligation for Energy Suppliers.
LOWER MANUAL EXCEPTION MANAGEMENT AND CROSS-PARTY INVESTIGATION EFFORT	Each disrupted Switch currently requires manual intervention, including exception review, Validation checks, and process correction. R0178 reduces or eliminates these manual workflows, directly lowering FTE effort across Energy Suppliers, the DCC, and the REC. Similarly, Switching issues commonly trigger multi-Party investigations to identify causes, reconcile data discrepancies, and coordinate corrective action. R0178 removes a known root cause of these incidents, reducing the time and resource costs associated with cross-Party coordination.
DECREASED CONSUMER CONTACT VOLUMES	Switching issues frequently result in additional Consumer enquiries, complaints, and escalations. By addressing a source of Switching disruption, R0178 reduces contact centre workload and helps prevent the downstream cost of complaint handling and escalations for Energy Suppliers.

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
IMPROVED CONSUMER SWITCHING EXPERIENCE	The solution under R0178 would support preventing stalled or failed Switches (e.g., due to missing Losing Supplier or duplicated MPxNs), Consumers would experience smoother, more reliable Switching journeys, improving overall satisfaction.
INCREASED CONFIDENCE IN MARKET PROCESSES	This Change Proposal would include changes to the Business Data Validation Rules that would support a more robust CSS that correctly handles edge-case scenarios (dormant/terminated meters, cancelled identifiers, OFAF duplicates) and strengthens industry trust in Switching processes.
REDUCED OPERATIONAL AMBIGUITY FOR REC PARTIES AND SERVICE PROVIDERS	R0178 would ensure that there are clear, enforced validation behaviours, (e.g. rejecting deactivation requests that quote a cancelled Registration identifier and rejecting OFAF payloads with duplicate MPxNs) remove ambiguity in areas about “what should happen” in unique cases, and ensuring Energy Suppliers and the DCC operate against a single, predictable set of rules. This reduces time spent on triage and clarifications, because BDVR-backed rejections will return explicit error information and (where required) new/updated message content identifying the duplicated MPxN, enabling Parties to correct and resubmit without escalation. This will ensure that the functions which are held within the CSS are used properly, reducing negative impact on user’s experiences of Switches through misuse.

FUTURE PROOFING OF CSS PROCESSES	R0178 will codify scenarios into Business Data Validation Rules and introduces necessary new message types/error codes that will assist the CSS against recurrence of similar defects (e.g. incumbent Energy Supplier withdrawal before Gate Closure, deactivation against wrong identifiers, OFAF duplicates), so future changes and market growth do not re-expose the same weaknesses. The design-in prevention approach ensures that once the rules are implemented, subsequent Energy Supplier behaviours and impacted cases are caught consistently at Validation rather than surfacing later as operational incidents.

11.3 COST BENEFIT ANALYSIS

The total Service Provider cost of implementing R0178 is £116,432.89 in design and development and £169,246.99 in implementation, with no material ongoing operational costs other than minimal Azure usage fees. This brings the total cost of R0178 to £285,679.88 with negligible ongoing costs (costed at £0 in this Change Report). These costs fall entirely on the DCC and its Service Providers, REC Parties (Energy Suppliers, DNOs, GTs) incur £0 in system-change costs, as noted in the Party impact assessment.

Although R0178 delivers only modest economic benefits, the primary benefits and value lie in the significant intangible benefits that are provided, most notably the future proofing of CSS processes and an improved Consumer Switching experience. R0178 strengthens the overall reliability of the Switching process and protects Consumers from a failed or delayed Switch. The justification, and cost-benefit analysis, of this change should therefore focus on the resilience the solution provides, ensuring a critical Consumer facing process remains accurate and deliverable.

It is also important to note that R0178 carries negligible ongoing costs. As such, the change requires a single investment of £285,679.88. Once implemented, this cost will substantially increase system robustness and materially improve the end-to-end Switching experience for Consumers. This assessment was reinforced by stakeholder feedback provided during previous Change Issues Group discussions, where stakeholders clearly expressed a preference for the more robust technical solution, despite its higher cost, to secure the resilience of CSS processes. The support for this solution highlights a shared industry recognition that system reliability and Consumer protection justify the investment.

12 CASE FOR CHANGE

The Code Manager believes R0178 should be implemented as it will significantly strengthen the resilience of the CSS, delivering clear and meaningful benefits for Consumers. Whilst the Change Proposal provides some tangible, and several intangible benefits, across the CSS, the primary benefit lies in the enhanced security and robustness it brings to the Consumer Switching experience. Protecting this process is a priority in line with the objective of the REC to ensuring efficiency in the operation of the central systems and will provide an important step is

safeguarding the Consumer experience, in line with the REC objective to ensure Consumer's interests are protected within REC operations.

The three proposed solutions to R0178 resolve the problem statement for all three of the key issues raised as part of this Change Proposal:

1. **Deactivation of an active Registration whilst in-flight Switch in progress:**
    - The proposed solution would ensure that the Consumer is Switched with the original effective date being used and ensuring that CSS systems can cater for such Registration events whilst following the normal Gate Closure processes.
2. **Deactivation of a prior cancelled Registration:**
    - The proposed solution resolves scenarios where the registered Energy Supplier of an MPxN is the same Energy Supplier that cancelled a previous Switch for the same MPxN by ensuring that SecuredInactive messages are not incidentally sent to MPxNs and allowing the end user to take action to resolve the error and then reissue the request. This will resolve incidents where the cancelled Registration state is erroneously changed to inactive, therefore ensuring that Switches are more reliable.
3. **OFAF switch containing multiple MPxN**
    - The proposed solution resolves issues where the end user sends through a One Fail All Fail (OFAF) Switch the same MPxN contained within the payload two or more times by ensuring that messages which include duplicate MPxN values are not incidentally sent and allows the end user to take action to resolve the error and then reissue the request. This will resolve incidents where multiple Registrations IDs are created for the same MPxN, leaving the Registration in an incorrect state. Resolving these incidents will ensure that Switches are more reliable.

In summary, R0178 is a change which provides system resilience and protects Consumers from one of the most detrimental experiences, a disrupted Switch. The focus for the case of this change needs to be on the system resilience which it offers, ensuring a crucial function for Consumers remains seamless including a correct Switch.

It should be noted that there are negligible ongoing costs for R0178 and therefore this change is asking for a one-off payment. Once this cost is invested, as explained in this report, the resilience of the system will be greatly increased and the Switching experience for Consumers will be greatly reinforced.

13 APPENDIX

CHANGE PROPOSAL	Link
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
RELATED CHANGE(S)	R0153 – Catering for Registration Events where the Incumbent Supplier Deactivates Prior to a Switch Becoming Effective
ANY OTHER DOCUMENTS	November 2025 REC Change Issues Group – R0178 Slide Deck

14 GLOSSARY

TERM	DEFINITION
Central Switching Service (CSS)	means the services provided pursuant to Condition 15 (Incorporation, delivery and provision of the Centralised Registration Service) of the DCC Licence, being the services provided under this Code by the CSS Provider, Switching Operator, CSS Certificate Authority and, until the end of the Post Implementation Period only, the Core Systems Assurance Provider and the CSS Systems Integrator.
Data Communications Company (DCC)	means the person holding the DCC Licence.
Dormant	means the RMP Status indicating that the RMP has been Isolated. This RMP Status only applies to gas RMPs.
Gaining Supplier	means, in relation to a proposed Switch (or Switch), the Energy Supplier which is proposing to become the Registered Supplier at an RMP as a result of that proposed Switch (or which has become the Registered Supplier as a result of that Switch).
Gate Closure	means, 17:00 hours on the day before the Supply Effective From Date of a Switch or Initial Registration.
Guaranteed Standards of Performance (GSOP)	means the regulations made under section 33A (and subsequent) of the Gas Act and/or section 39 (and subsequent) of the Electricity Act, including the Electricity and Gas (Standards of Performance) (Suppliers) Regulations 2015

TERM	DEFINITION
Losing Supplier	means, in relation to a proposed Switch (or Switch), the Energy Supplier which will cease to be the Registered Supplier at an RMP as a result of that proposed Switch (or which has ceased to be the Registered Supplier as a result of that Switch).
Meter Point X Number (MPxN)	means the collective description of the MPAN and MPRN when used together.
Objection	means a request from the Losing Supplier to block a Switch Request for reasons permitted under the relevant Energy Supply Licence.
One Fail All Fail (OFAF)	means that a Switch Request has been identified as dependent upon the successful progress of other Switch Requests in the same OFAF Group (or, following Validation of one or more of those Switch Requests, all the resulting Registrations while they are either Pending or Confirmed).
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 Deactivation Request	means, for an RMP, a request from the Registered Supplier to end the Registered Supplier's Active Registration in respect of that RMP.
Switch	means a change to the Registered Supplier for an RMP.
Switch Request	means a request from a Gaining Supplier to initiate a Switch.
Terminated	means the RMP Status indicating that an RMP is: (a) in the case of gas RMPs, no longer capable of offtaking gas; or (b) in the case of electricity RMPs, disconnected.
Validation	means the tests required to be undertaken in respect of a Submitted Registration Service Request, as described in the Registration Services Schedule.