RETAIL ENERGY CODE

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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	2.0
PROPOSED IMPLEMENTATION DATE	JUNE 2026
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, GAS TRANSPORTERS, 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 that were identified with the CSS Business Process Logic.

These have been identified as follows:

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

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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 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 Consequently, it was decided that R0153 be withdrawn and incorporated into this new Change Proposal that is aimed towards rectifying the collection of issues that have been identified with the CSS Business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 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. Therefore, this has a direct impact on consumers who have a Switch Request which has already been accepted but CSS is not able to progress further as the Switch process stops.

Indeed, there have been a total of 82 missing messages observed since 1st January 2023, of which 66 messages have been related to switches where there was no registered Supplier recorded at Gate Closure.

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

It should also be noted that the 1st 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 supplier of a MPxN (via the active Registration) is the same supplier that cancelled a previous Switch for the same MPxN. In this case there is the possibility that the supplier could attempt to deactivate the active Registration by accidentally providing the cancelled Registration identifier.

Currently, CSS still accepts the deactivation request and erroneously changes the cancelled Registration state from cancelled to inactive, sending out securedInactive messages.

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

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 2 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 1 of the 2 registrations for each MPxN. The remaining 2 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 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. Therefore, this has a direct impact on Consumers who have a Switch Request which has already been accepted but CSS is not able to progress further as the Switch process stops.

Deactivation of a prior cancelled Registration:

This scenario occurs when the registered supplier of a MPxN (via the active Registration) is the same Supplier that cancelled a previous Switch for the same MPxN. In this case there is a possibility that the 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 2 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 Business Data Validation Rules (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 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 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 DETAILED TECHNICAL IMPACTS

The following detailed impacts for the following market scenarios and data specification have also been identified. Please note, these impacts are dependent upon the solution that is taken forward and will be confirmed following subsequent Impact Assessment activities.

MARKET SCENARIOS	
Registration Deactivation Requests	Dependent upon the solution selected, this market scenario may need to be updated.
Switching Market Scenarios	Dependent upon the solution selected, market scenarios related to switching may need to be updated.

OFAF Switch	Dependent upon the solution selected, market scenario related to OFAF switching may need to be updated.

DATA SPECIFICATION	
Error Codes	As part of this Change Proposal, there may be a need to introduce further error codes to stop the erroneous scenarios from occurring. This may therefore require updates to be made to the data specification to capture these accordingly.

3.2 ASSESSMENT AGAINST MARKET-WIDE HALF HOURLY SETTLEMENT

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

4 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**11-Jun-24**	**30-May-25**
	Solution Development	June	February
	Service Provider Impact Assessment	August	April
	Solution Refinement	April	April
	Party Impact Assessment	May	May
Change Proposal		**31-May-25**	**05-Aug-25**
	Business Case Assessment	June	June
	Consultation	June	July
	Final Determination	July	August
Voting		**05-Aug-25**	**05-Aug-25**
	Appeal Window	05 August	19 August

Please note, an updated Proposal Plan was approved by the REC Change Panel on 18 February 2025. This Change Report (Proposal Plan) was published as Version 2.0 and contains the updated Proposal Plan.

5 STAKEHOLDER ENGAGEMENT

This Change Proposal is being supported through Stakeholder Engagement via the Technical Change Workshop (TCW). In this workshop, Stakeholders are asked to review solution requirements and provide details into any investigations into the issues raised as part of this Change Proposal. Engagement with the TCW will continue throughout the duration of this change.

6 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.

SOLUTION

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 CSS provider investigate all possible options and outline their recommendation for the most suitable approach, which would be developed/progressed further through the subsequent Impact Assessments.

- However, the aim is for an effective solution to be developed which would ensure that the consumer is switched with the original effective date being used and that 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 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 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 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)

Deactivation of a Prior Cancelled Registration

The solution for this issue will be formed as part of the Service Provider Impact Assessment. However, as part of the Stakeholder Engagement with the Technical Change Workshop (TCW), the following requirements and success criteria has been set.

REQUIREMENT	SUCCESS CRITERIA
Suppliers to have their deactivation request to fail validation if a cancelled Registration identifier is used.	• A registered Supplier of an MPxN is unable to use a cancelled Registration identifier to change the Registration state. • CSS has a validation rules(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.
Suppliers to be notified that their deactivation request has failed validation due to a cancelled Registration identifier being used.	• CSS identifies that the Supplier has issued a messaged using a cancelled Registration identifier using message validation rules and rejects the message. • The registered Supplier receives the appropriate message rejection code.

OFAF Switch Containing Multiple MPxN

The solution for this issue will be formed as part of the Service Provider Impact Assessment. However, as part of the Stakeholder Engagement with the Technical Change Workshop (TCW), the following requirements and success criteria has been set.

REQUIREMENT	SUCCESS CRITERIA
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.
Suppliers to be notified that their OFAF Switch Request has failed validation due to duplicate MPxNs being used within the payload 2 or more times.	• CSS identifies that the Supplier has issued a OFAF Switch Request using duplicate MPxNs using its message validation rules and rejects the message. • The registered Supplier receives the appropriate message rejection code detailing the MPxN which has been duplicated.

8 KEY RISKS ISSUES ASSUMPTIONS AND DEPENDENCIES

No risks, issues, or assumptions have been identified at this stage.

8.1.1 DEPENDENCIES

NO.	DEPENDENCY	NOTES	STATUS
R0178_D01	Impacts on Market Scenarios and Data Specification	These impacts will be dependent upon the solution chosen. This will be determined following Impact Assessment activities. An update will be provided in any subsequent Change Report.	In Progress.

9 APPENDIX

CHANGE PROPOSAL	Link
RELATED CHANGE(S)	R0153 – Catering for Registration Events

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10 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.
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.
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.
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.
Switch	means a change to the Registered Supplier for an RMP.
Switch Request	means a request from a Gaining Supplier to initiate a Switch.