RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0178 – IMPROVEMENTS TO CSS BUSINESS PROCESS LOGIC

On 17 April 2025 the Code Manager issued an impact assessment to industry to seek feedback on the proposed solution for R0178.

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

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RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	18/03/2026
RESPONSIBLE COMMITTEE	Technical Expert Panel
LEAD ANALYST	James Hardy
TECHNICAL ANALYST (SOLUTION LEAD)	Finn Deacon

DATE IMPACT ASSESSMENT ISSUED	17/04/2025
RESPONSE DEADLINE	12/05/2025

Question 1:	Do you have any comments on the proposed solution? If so, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Whilst we are happy with the proposed solution, we would query the estimated timeline for delivery and question whether this can be reduced. At 43 weeks it seems a little excessive, particularly if the issues identified are causing customer detriment. The problem statement for #1 - Deactivation of an active Registration whilst in-flight Switch in progress states "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." A delivery window of 43 weeks would result in this change being implemented after the October 2025 contracting date.	The Code Manager reviewed the comments and, together with the respondent, addressed them through further solution analysis and discussion during the Technical Change Workshop and Change Issues Group as the Change Proposal developed
Xoserve	There is very limited information provided in the report related to the solutions proposed. We surmise from the report that: Scenario 1: - Where the RMP is Dormant, then the Registration should continue with the original Registration Date. It is unclear from the information provided what transactions that will be provided to support the original Registration Date being retained.	The Code Manager reviewed the comments and, together with the respondent, addressed them through further solution analysis and discussion during the Technical Change Workshop and Change Issues Group as the Change Proposal developed

	- Where the RMP is Terminated then the Switch should not continue. It is unclear from the information provided what transactions will be provided to support this Registration being cancelled. Scenario 2: CSS will reject any deactivation requests that contain a cancelled Registration identifier. Scenario 3: CSS will reject any OFAF Switch Requests that contain multiple MPxNs. With respect to Scenarios 2 and 3, we anticipate that the GRDA and GES Services will be unaffected by these scenarios. We would expect the rejection of such flows to be managed between CSS and Suppliers – and these will not generate any transactions to the GRDA (and GES). Whilst the GRDA do undertake some Registration activities under Transporter Initiated Registrations these will not use OFAF (Scenario 3) and are not deactivation requests (Scenario 2). **Of the detail provided for Scenario 1, we cannot assess the solution as no solution information has been provided. We would speculate that the solution option selected should ensure that the GRDA and GES have no functional changes to make.** For Terminated RMPs, then the GRDA should receive notice of Cancellation of the Registration. For Dormant RMPs, then we anticipate that a number of solution options could be undertaken to achieve the stated intention of retaining the original Registration Date so cannot speculate about the option that might be proposed by CSS – and will need to IA the options proposed when a sensible level of detail is provided.	

Question 2:	Do you agree with the proposed solution addresses the problem statement? If not, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Overall, we agree that the proposed solution adequately addresses the problem statement, however as mentioned above, we believe that the long timeline for delivery of the proposed solution would cause further negative impact on customers, therefore not entirely meeting the needs identified in the problem statement of '1. Deactivation of an active Registration whilst in-flight Switch in progress'.	Thank you for your response.
Xoserve	We cannot comment as the scenario that we are interested in does not provide any solution information with which to offer an opinion.	As this Change Proposal has progressed, the Code Manager has engaged with the respondent with further details and options for this change.

Question 3:	The CSS Provider will be inviting Parties to participate in testing this solution, would you be interested in volunteering to take part in their testing activities?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Whilst normally we would be more than happy to offer our assistance wherever it may be required, regrettably our resourcing is heavily constrained by MHHS at present and unfortunately that means we will be unable to volunteer at this point.	Thank you for your response.

Xoserve	We will need to make this assessment once we are made aware of the solution options considered for Option 1. We would expect that there will be a further IA when these options are defined.	The Code Manager reviewed the comments and, together with the respondent, addressed them through further solution analysis and discussion during the Technical Change Workshop and Change Issues Group as the Change Proposal developed

Question 4:	Would implementing the proposed solution incur any costs to your business? If so, please provide details breaking down design/build/test costs and on-going costs. If preferable, please indicate which of the below ranges your costs may fall: a) Nil; b) Up to £9,999; c) Between £10,000 and £49,999; d) Between £50,000 and £99,999; or e) More than £100,000	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	As we would not incur any system changes to accommodate this change, we would expect our costs to be minimal. Therefore, the most appropriate estimation from the list of options provided above would be A) Nil.	Thank you for your response.
Xoserve	We are unable to comment on the impacts to the GRDS or the GES as there is insufficient information provided.	As this Change Proposal has progressed, the Code Manager has engaged with the respondent with further details and options for this change.

Question 5:	Do you foresee any technical challenges or integration issues with your current systems should the solution be implemented? Is there a specific lead time which would be required.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We would not incur any system changes to accommodate this change, therefore there should be no technical challenges for us, or integration issues our current systems.	Thank you for your response.
Xoserve	We are unable to comment on the impacts to the GRDS or the GES as there is insufficient information provided.	As this Change Proposal has progressed, the Code Manager has engaged with the respondent with further details and options for this change.

Question 6:	Do you identify any benefits to your business (e.g. FTE savings or improved timescales for processing messages) through the implementation of this functionality? If so, please provide details	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	The main benefit for us would be that, should this change be implemented, it should leave us with less incidents to triage. In turn this would hopefully improve our resource efficiency in that area.	Thank you for your response.
Xoserve	Scenario 1 is the leading cause of missing messages from CSS. But experience has proven that we will need to continue to run the processes to monitor at Gate Closure instances of missing messages so as to minimise the Operational Impacts when these arise. So no operation resource savings or changes to our processes are envisaged.	Thank you for your response.

Question 7:	Do you believe there are any risks or issues relating to the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Only the lengthy implementation timeline as mentioned in our answer to question 1, as this could cause issues relating to the October 2025 contracting date.	Thank you for your response.
Xoserve	We are unable to comment on the risks / issues as there is insufficient information provided.	As this Change Proposal has progressed, the Code Manager has engaged with the respondent with further details and options for this change.

Question 8:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We have no further comments.	Thank you for your response.
Xoserve	I am concerned that there are multiple references to the instances where scenarios are not defined in 'Business Data Validation Rules'. It is unclear to me who takes responsibility for authorship / approval and review of this document and where this document is governed. Could you please share the details of this please	As this Change Proposal has progressed, the Code Manager has engaged with the respondent with further details and clarifications.