RETAIL ENERGY CODE

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

CHANGE REPORT

R0215 SCHEDULE 30 SWITCH METER READING PROBLEMS - REJECTIONS AND TIMINGS

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	07 November 2025
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Change Panel	**CHANGE PATH**	Self-Governance
PRIORITY STATUS	Medium	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Energy Suppliers		

LEAD ANALYST (SOLUTION LEAD)	ASSURANCE LEAD	SUBJECT MATTER EXPERT
CAROLINE FREIMULLER	VAISHNAVI SHARMA	LORNA MALLON
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OVERVIEW

It has been reported that REC Parties may employ practices relating to Switch Meter Reading problems where the Code has not caught up, both in terms of Performance Assurance and regulatory oversight. This Issue seeks to explore Energy Supplier practices to determine if Code changes are needed to improve robustness around the Disputed or Missing Switch Meter Reading processes.

RESPONSIBLE COMMITTEE DECISION

On **17 June 2025**, the REC Change Panel voted in line with the Code Manager recommendation to:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 07 November 2025.

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BACKGROUND

1 SUMMARY

Following a discussion at the REC Issues Group (RIG), the Code Manager is exploring the Electricity Disputed Switch Meter Read (D0300) process. It has been suggested that the wording of Schedule 30 – Resolution of Consumer Facing Switching & Billing Issues is not sufficiently clear on how D0300 rejections relating to technical reasons are handled. As such, the suggestion given to the Code Manager during the discussion at the RIG is that technical rejections are being escalated unnecessarily.

The Code Manager is also exploring if Schedule 30, as well as the Performance Assurance Report Catalogue (PARC), sufficiently provide for scenarios where a Notification of Change of Supplier Reading (D0086) may be sent in response to a Missing Read D0300. In this scenario, an Energy Supplier who sends a D0300 regarding a missing D0086 may receive a D0086 in response, which operationally resolves their problem, but leaves the initial D0300 without a second response D0300 from the receiving Supplier.

The scope of this Change Proposal has since been narrowed, to only focus on only where a Switch Metering Reading was not received, and one was sent in response to a D0300. It has been expanded to include the gas Shipper Agreed Read (SAR) process.

2 PROBLEM STATEMENT

Suppliers may interact with the Missing Switch Read process in a way that is operationally standard for them but not reflected in the Code. This means that the D0300 or SAR may either be escalated unnecessarily (including Performance Assurance checks), or may not be responded to, whilst still resolving the overall issue.

3 IMPACTS

CONSUMERS
All Consumers

RECCO / REC CODE MANAGER
REC Performance Assurance

REC PARTIES AND SERVICE USERS
Energy Suppliers

REC DOCUMENTS / PRODUCTS
Schedule 30 – Consumer Facing Switching & Billing Issues

MHHS DESIGN	MHHS DATA SPECIFICATION	MHHS CODE DRAFTING
No impact	No impact	Indirect impact

There is indirect impact to Schedule 30 – Resolution of Consumer Facing Switching & Billing Issues which is undergoing changes due to MHHS. The Code Manager will review to ensure there are no conflicts between these changes.

4 CROSS-CODE IMPACTS

There are no cross-code impacts identified with this Change Proposal.

5 PROPOSAL PLAN

Milestone	Activity	From	To
Definition		**17-Dec-24**	**31-May-25**
	Solution Development	December	March
	Impact Assessment	April	May
	Solution Refinement	May	May
Change Proposal		**01-Jun-25**	**18-Aug-25**
	Business Case Assessment	May	June
	Consultation	June	July
	Final Determination	July	August
Voting		**19-Aug-25**	**19-Aug-25**
	Appeal Window	03-Sep-25	03-Sep-25

The Code Manager was able to proceed to impact assessment and consultation earlier than expected and so is taking the solution to voting two months earlier than planned.

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6 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	Innovation and Market Arrangements	0	17	0
	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		2	9	18
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)*		Other Planned Activity	1	10	10
				Overall Priority Score (rounded)	126

Priority Status	MEDIUM
Change Proposal Type	STANDARD

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SOLUTION

7 PROPOSED SOLUTION

The proposed solution is the insertion of the below sentence into Schedule 30 – Resolution of Consumer Facing Switching & Billing Issues, section C, paragraph 9.11.3:

- Where a Request was raised in regards to 9.11.1(b) (a Switch Meter Reading was not obtained) and the Switch Meter Reading has subsequently been sent, no response or further action is required.

This changes the Code for both Electricity (D0300s) and Gas (SARs), allowing that a missing Switch Meter Reading D0300 and SAR does not need to be responded to when the Switch Meter Reading is received.

The Code Manager has been told via the REC Issues Group that this is how many Energy Suppliers already operate and that the Code has not caught up to how this process is being practically utilised.

8 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0215 can be found on the REC portal.

- The changes in the pre-MHHS version of Schedule 30 can be found here.
- The changes in the post-MHHS version of Schedule 30 can be found here.

Only the pre-MHHS version was available for impact assessment, and no changes were made between impact assessment and consultation.

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PRELIMINARY ASSESSMENT

9 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

9.1 SERVICE PROVIDER IMPACT ASSESSMENTS

No Service Provider impact assessment was required as part of this Change Proposal.

9.2 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was conducted from 26 March to 12 April 2025. One response was received from an Energy Supplier. The response was submitted non-confidentiality and has been published here.

ENERGY SUPPLIERS	• The Energy Supplier was happy with the proposed solution, and agreed the change should be made. They had some feedback that the problem statement was too broad, so the Code Manager has reviewed this. • They commented that the legal text should be reviewed for clarity. The Code Manager believes the legal text is clear in its current wording and has made no changes post impact assessment, but welcomed more specific feedback at consultation. • They confirmed they agreed the solution appropriately accounts for the industry move to MHHS. • They confirmed they required no lead time for the implementation of this change, and that they expected costs to be under £10,000. • They identified one key benefit to their business with potential reductions on escalations where a Switch Meter Reading has been received.

10 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

There are no risks, assumptions, issues or dependencies identified with this Change Proposal.

11 BUSINESS CASE ASSESSMENT

11.1 COSTS

There are no central systems associated with the implementation of this Change Proposal. The one respondent to the impact assessment confirmed they foresaw their costs as being under £10,000.

11.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
REDUCTION IN ESCALATION BETWEEN ENERGY SUPPLIERS	By no longer requiring a response to be sent to a D0300 or SAR requesting a missing Switch Meter Reading once that Switch Meter Reading has been received, Energy Suppliers will no longer need to escalate for a response to the D0300 or SAR when the issue has been functionally resolved.
REDUCTION IN PERFORMANCE ASSURANCE ESCALATIONS TO ENERGY SUPPLIERS	By no longer requiring a response to be sent to a D0300 or SAR requesting a missing Switch Meter Reading once that Switch Meter Reading has been received, REC Performance Assurance will no longer be required to flag to the Energy Supplier that the process has not completed.

11.3 COST BENEFIT ANALYSIS

There are no central system costs, the costs to impacted Party types are minimal and there are two intangible benefits associated with this Change Proposal. As such, the Code Manager believes there is a positive case for change.

12 CASE FOR CHANGE

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

- Is both viable and implementable, and effectively resolves the problem statement;
- Has no associated costs and has proportionate effort required for implementation;
- Should see a reduction in escalations on D0300s and SARs between Energy Suppliers; and
- Should see a reduction in Performance Assurance escalations to Energy Suppliers.

13 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 01 May 2025 to obtain views on the Change Report (For Consultation). In total one response was received from an Energy Supplier. The key themes from this response has been summarised and set out below.

13.1 SUMMARY OF RESPONSES

The respondent was overall positive and agreed that this Change Proposal should be implemented.

They provided further comments that there are further improvements that could be made to the Disputed Read process but did not provide any examples or details. The Code Manager welcomes Parties to raise future Issues or Change Proposals expressing their proposed improvements to the process, and is also happy to facilitate any discussions at the REC Issues Group prior to any Party raising a change.

13.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

The respondent agreed with the proposed solution, and no comments on the legal text.

13.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

The respondent agreed with the Code Manager's assessment of the costs and benefits for this Change Proposal. They also agreed with the Code Manager's assessment that this should be recommended for approval, and subject to Self-Governance approval by the REC Change Panel.

13.4 IMPLEMENTATION DATE AND APPROACH

The respondent agreed with the proposed implementation date of 07 November 2025 and technique of big bang implementation.

14 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No changes were made following consultation.

15 APPENDIX

CHANGE PROPOSAL	Link
REC ISSUES GROUP NOTES	Link
LEGAL DRAFTING	Link – pre MHHS version Link – post MHHS version
CONSOLIDATED IMPACT ASSESSMENT RESPONSES	Link
CONSOLIDATED CONSULTATION RESPONSES	Link

16 GLOSSARY

TERM	DEFINITION
Dispute	has the meaning given to that term in Clause 22.
Disputed Switch Meter Read	means that the Switch Meter Reading is disputed by the Consumer, Losing Supplier or Gaining 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.
Missing Switch Meter Reading	means that a Switch Meter Reading has not been obtained within the timescales required by the Resolution of Consumer-Facing Switching and Billing Problems Schedule.
Rejected	means the Registration Service Request Status as described in Paragraph 1.3 of the Registration Services Schedule.
Switch	means a change to the Registered Supplier for an RMP.