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

CHANGE REPORT

R0322 – ERRONEOUS SWITCH REVIEW: I0237 CLARIFICATIONS

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	26 February 2027
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Change Panel	**CHANGE PATH**	Self-Governance
PRIORITISATION CATEGORY	Standard	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Consumers, Energy Suppliers		

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

The I0237 – Erroneous Switch Review: CSS Solution working group has carried out an end-to-end review of the Erroneous Switch process. The working group highlighted housekeeping changes and clarifications within Schedule 30 – Resolution of Consumer Facing Switching and Billing Issues and the Market Messages that should be implemented as soon as possible.

RESPONSIBLE COMMITTEE

On 03 November 2026, the Change Panel, in line with Code Manager recommendation, voted to:

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

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BACKGROUND

1 SUMMARY

R0322 seeks to correct drafting inconsistencies, inaccuracies, and terminology issues within the Erroneous Switch (ES) provisions of the REC, primarily Schedule 30 – Resolution of Consumer Facing Switching and Billing Issues and associated Market Messages. An end-to-end review of the ES process carried out by the I0237 – Erroneous Switch Review working group identified that elements of the current drafting do not fully or accurately reflect the intended governance, contractual, and operational arrangements. These issues have the potential to cause confusion and misunderstanding between Energy Suppliers when navigating ES requirements.

The working group highlighted several specific areas where clarifications and minor corrections are required. For example, the RET Erroneous Switch Market Message (MM40007) currently references Schedule 10 rather than the correct Schedule 30, creating ambiguity about the applicable governance framework. More broadly, the review identified the need for consistent and accurate terminology across Schedule 30, Market Messages, and Data Items, in order to better reflect current process arrangements.

The amendments and clarifications proposed include replacing references from “Customer” to “Consumer”, aligning terminology by updating “Transfer” to “Switch”, amending Erroneous Switch Reason Code descriptions to more accurately reflect dual fuel scenarios where appropriate, and clarifying when the ES flag should and should not be used. These updates are supported by revised legal text, updated Market Messages, and amended Data Items, all of which are intended to improve clarity and consistency.

The I0237 working group identified these corrections and clarifications as quick wins that can be progressed independently of, and in parallel with, the ongoing I0237 work. R0322 will provide an approach to implement these targeted improvements promptly, reducing the risk of misinterpretation, strengthening legal clarity, and supporting more effective and consistent application of the ES process by all Market Participants, while wider I0237 activity progresses in line with the I0237 scope.

2 PROBLEM STATEMENT

The current ES drafting contains inconsistencies that can cause confusion and misunderstanding between Energy Suppliers regarding the applicable governance and process requirements, creating ambiguity around the correct contractual and operational framework. In addition, the I0237 Working Group has identified further required amendments to Schedule 30, highlighting that the existing drafting does not fully or accurately reflect intended process arrangements or correct terminology.

3 IMPACTS

CONSUMERS	REC PARTIES AND SERVICE USERS	REC DOCUMENTS / PRODUCTS
All	Energy Suppliers	Schedule 30 - Resolution of Consumer Facing Switching and Billing Issues
		Data Specification

MHHS
No impacts.

4 CROSS-CODE IMPACTS

No cross-code impacts have been identified by the Code Manager at this stage.

5 PROPOSAL PLAN

Milestone	Activity	From	To	From	To
Change Proposal		**01 May-26**	**19 Oct-26**	**01 May-26**	**19 Oct-26**
	Change Issues Group Engagement	May	July	May	July
	Legal Review	May	May	May	May
	Party Impact Assessment	June	July	June	July
	Solution Refinement	August	August	August	August
	Consultation	September	September	September	October
	Solution Refinement	-	-	October	November
	Final Recommendation	October	October	November	November
Voting		**20 Oct-26**	**20 Oct-26**	**03 Nov-26**	**03 Nov-26**
	Appeal Window	21 October	04 November	03 November	17 November

6 STAKEHOLDER ENGAGEMENT

Solution analysis and development for R0322 have been informed by stakeholder feedback gathered through the I0237 working group, which highlighted that the current ES drafting in Schedule 30 contains inconsistencies and inaccuracies that can create confusion between Energy Suppliers regarding the applicable governance, contractual, and operational requirements. In particular, the working group identified that certain aspects of Schedule 30 do

not fully reflect the intended process arrangements or apply correct and consistent terminology, indicating the need for targeted drafting corrections.

To support the development of an appropriate and legally robust solution, the Code Manager undertook further targeted stakeholder engagement through the Change Issues Group between May and July 2026, alongside a legal review during May 2026. This engagement focused on discussing the findings of the legal review, reviewing potential legal drafting options, and confirming the appropriate scope of amendments (including considering the scope of further Issues and Change Proposals relating to the ES review) required to address the identified inconsistencies prior to progression of the Change Proposal.

Following completion of the Change Issues Group engagement and legal review, the Code Manager issued a Party impact assessment between June and July 2026.

7 PRIORITISATION CATEGORY AND URGENCY

7.1 CODE MANAGER REVIEW

The Code Manager is proposing this Change Proposal be given an Urgency Status of Standard and a Prioritisation Category of Standard.

The Code Manager believes this Change Proposal:

- Does not meet the Ofgem criteria for Urgency;
- Has a medium alignment to the Strategic Direction Statement (SDS) as it has a reasonable SDS link but is one of several similar Standard changes with comparable strategic value;
- Has medium importance as delivers useful but broadly comparable benefits to other Standard changes; and
- Has a low complexity as it delivers simple documentation updates.

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SOLUTION

8 PROPOSED SOLUTION

The proposed solution for R0322 includes drafting corrections and clarifications to the ES arrangements within the REC, including to Schedule 30 and associated Market Messages and Data Items.

The legal drafting to accompany the proposed solution can be accessed here. A summary of the proposed changes is detailed below.

8.1 SCHEDULE 30 – RESOLUTION OF CONSUMER FACING SWITCHING AND BILLING ISSUES

The proposed solution includes a number of terminology and drafting updates to Schedule 30 to ensure consistency with current market arrangements and REC documents. References to "Customer" will be amended to "Consumer", "Transfer" to "Switch", and "MPAN" to "MPxN", aligning with standard REC terminology and improving consistency across Schedules and processes.

A new table setting out ES reason codes, including the code, name, and description, has been added to improve transparency and ease of reference. Further, the description of the ES reason code "technical" has been clarified to better reflect its original intended application

Paragraph 5.3 has been amended to clarify that following an ES being identified, the Gaining Supplier should stop collecting and delete the data obtained during the ES period, while still being compliant with relevant legal obligations. Paragraph 6.5(d) has also been clarified to more clearly set out the circumstances in which it should apply, supporting more consistent interpretation and application of the process.

8.2 ERRONEOUS SWITCH FLAG DATA ITEM

Clarifications have been made to the ES Flag Data Item to confirm that it represents the final step in the ES process. The proposal also amends the Logical Length and Physical Length to 5. The enumeration values are only being amended to lowercase words. These amendments are made to provide consistency with the structure used within the technical architecture. Additional amendments to the Enumeration Values are being proposed ('TRUE' to 'true' and 'FALSE' to 'false'). These amendments seek to provide consistency with the correct format of using lower case values.

8.3 RET AND GAS DATA ITEMS

Updates to the RET and gas ES Data Items are proposed to align terminology with Schedule 30 and electricity arrangements. This includes replacing "Transfer" with "Switch", and correcting references from Schedule 10 to Schedule 30. Additional updates are being made to DI40213 Status Response RET to replace 'current Supplier' / 'original Supplier' with 'Gaining / Losing Supplier'. This amendment will only be made to this Data Item within MM40007 RET Flow to match the current REC terminology.

ES reason code descriptions have been amended to align with the electricity descriptions, while retaining the existing underlying values. Status response descriptions have similarly been amended to match electricity, again with no change to the values themselves, ensuring dual-fuel consistency without introducing system impacts.

8.4 D0301 AND ELECTRICITY DATA ITEMS

For D0301 and related electricity Data Items, the proposed solution includes equivalent terminology updates from “Transfer” to “Switch”.

ES reason code descriptions have been amended to align with the gas arrangements, with no changes to the existing values.

DI50998 (Status of Erroneous Transfer) Enumeration Values Descriptions have been amended to ensure clarity and consistency by using current REC terminology (‘Old Supplier’ to ‘Losing Supplier’ and ‘New Supplier’ to ‘Gaining Supplier’).

8.5 DI40213 – STATUS RESPONSE RET DATA ITEM

Correction of a typographical error in the DI40213 – Status Response RET Data Item is being proposed. The current description for enumeration value T states, “Not accepted because transfer took place more than 4 months before initiation of returned request”. This is inaccurate and inconsistent with the existing Erroneous Switch framework, under which the applicable period is 24 months. This amendment was initially included in REC Change Proposal R0313 Erroneous Switch Review: Amendments to Clause 4.5. Following industry feedback as part of R0322 Party impact assessment, this correction has been included in R0322 to allow a timely correction.

9 DESCOPED SOLUTION

Following the REC Change Panel presentation on 18 August 2026, a series of amendments were made to the proposed solution for R0322. These amendments are recorded in section 8 above. This section 9 will explore the initial amendments proposed under R0322 that will no longer be considered following comments and discussions at REC Change Panel meeting.

9.1 SCHEDULE 30 – RESOLUTION OF CONSUMER FACING SWITCHING AND BILLING ISSUES

The proposal considered removing the note regarding the deletion of data collected within the ES period. This was removed from R0322 and a reference to the deletion of this data was re-introduced to ensure there is sufficient clarity around the activities needed to be performed for this data.

9.2 ERRONEOUS SWITCH FLAG DATA ITEM

This initial proposal looked at amending the Enumeration Values from 'TRUE/FALSE' to 'T/F' to match the Physical Length of 1. Following Change Panel comments, a further assessment was done by the Code Manager that revealed the Enumeration Values are correct, but the Physical Length and Logical Length require amendments.

9.3 RET AND GAS DATA ITEMS

Updates to the RET and gas ES Data Items were initially proposed to align terminology with Schedule 30 and electricity arrangements. This included replacing "Transfer" with "Switch". Following comments received from the REC Change Panel, the Code Manager amended the proposal to match the current REC terminology by including 'Losing/Gaining Supplier'.

Amendments to replace 'Customer' to 'Consumer' have been removed from the scope of R0322 solution. This is to ensure the terminology used between gas and electricity. A wider REC terminology update will be cover by a future REC Change Proposal, to cover both fuels.

9.4 D0301 AND ELECTRICITY DATA ITEMS

For D0301 and related electricity Data Items, the proposed solution included equivalent terminology updates from "Transfer" to "Switch". Amendments to replace 'Customer' to 'Consumer' have been removed from the scope of R0322 solution. This is to ensure the terminology used between gas and electricity. A wider REC terminology update will be cover by a future REC Change Proposal, to cover both fuels.

10 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0322 can be found here.

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PRELIMINARY ASSESSMENT

11 SUMMARY OF IMPACT ASSESSMENT ACTIVITY

11.1 REC PARTY IMPACT ASSESSMENTS

A Party impact assessment was conducted from 26 June 2026 to 17 July 2026. In total two responses were received from Energy Suppliers. The non-confidential responses have been published here.

[ENERGY SUPPLIERS]	• Both respondents provided support of the proposed solution. • One respondent agreed that the amendments provide valuable clarification and improved consistency across the Erroneous Switch arrangements. • One respondent noted that some updates to their current work processes and system configuration work would be needed. These are associated with the data flow clarifications and associated data items amendment for electricity. The costs for these amendments are estimated to 'up to £9,999'. • Both respondents agreed that the correction to DI40213 should be included within R0322. • Overall support was received for the proposed implementation approach and timeline.

11.2 SUMMARY OF AMENDMENTS MADE FOLLOWING IMPACT ASSESSMENT

DOCUMENT	SECTION	AMENDMENT	REASON
Data Specification	DI40213 (Description)	"Not accepted because transfer took place more than 24 months before initiation of returned request."	Following industry feedback as part of Party impact assessment to question 6, this correction has been removed from R0313 scope and included in R0322 to allow for a timely correction.

12 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

12.1 RISKS AND ISSUES

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

12.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
CLARITY AND CONSISTENCY	The proposed corrections and clarifications will remove confusion and misunderstanding between Energy Suppliers, more specifically when it comes to cross referencing (for example, the RET Market Message (MM40007) currently references Schedule 10, not Schedule 30).
CONSUMER SWITCHING EXPERIENCE	Improved clarity of Data Items and cross referencing will provide a more efficient operation of ES cases.

13 CASE FOR CHANGE

SELF GOVERNANCE

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 central system costs and minimal Party costs;
- Has proportionate effort required for implementation; and
- Is providing needed clarity and consistency around the Erroneous Switch REC products.

14 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 21 August 2026 to obtain views on the Change Report (For Consultation). In total four responses were received from Energy Suppliers. The key themes from these responses have been summarised and set out below. The non-confidential responses have been published here.

14.1 SUMMARY OF RESPONSES

The respondents were broadly supportive of the Change Proposal, the proposed solution and the implementation date. One respondent was supportive of the proposed solution but sought clarification on two elements of the solution: the Erroneous Transfer timeframe and data retention during the Erroneous Switch period.

14.2 COMMENTS ON THE SOLUTION AND PROPOSED LEGAL TEXT

The respondents were broadly supportive of the Change Proposal and proposed legal text changes. One respondent was supportive of the proposed solution but sought clarification on two elements of the solution: how the correction of the RET rejection timeframe in this Change Proposal to 24 months would interact with the separate proposal to reduce the Erroneous Transfer timeframe to 12 months, and how the requirement to stop collecting and delete data would apply where that data is still needed for settlement, onward provision, legal retention or other market obligations.

The Code Manager clarified that the 24-to-12-month change will be addressed separately through R0313 and likely at a later release date. R0322 will only focus on correcting a typographical error. On data retention, the Code Manager confirmed that the Schedule 30 legal drafting clarifies existing REC obligations and does not change the steps Energy Suppliers already follow.

14.3 BENEFITS RELATIVE TO IMPLEMENTATION AND OPERATIONAL COSTS

The respondents broadly agreed with the Code Manager's assessment of the costs and benefits for this Change Proposal. One respondent suggested that the costs assessments should be revisited if the clarification on data retention results in additional systems, Settlement, or data-handling requirements for Energy Suppliers. The Code Manager confirmed that this clarification is not a new obligation, and as such the business case calculation will not be revisited. No further costs nor benefits were identified by respondents.

14.4 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

The respondents agreed with the Code Manager's assessment of the case for change and that it should be subject to the Self-Governance Change Path, with approval by the REC Change Panel.

14.5 IMPLEMENTATION DATE AND APPROACH

The respondents broadly agreed with the Code Manager's recommendation that the Change Proposal should be approved for implementation on 26 February 2027, as well as the implementation approach of Big Bang. One respondent mentioned that any required operational or technical guidance should be issued with sufficient time for Energy Suppliers to assess and implement resulting changes. The Code Manager confirmed there will be no guidance documentation provided as part of the R0322 solution as no additional requirements are being proposed by this Change Proposal.

15 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No amendments were made following impact consultation.

16 APPENDIX

CHANGE PROPOSAL	Link
I0237 WORKING GROUP	Link
LEGAL DRAFTING	Link
CONSOLIDATED CONSULTATION RESPONSES	Link
RELATED CHANGE(S)	I0237 – Erroneous Switch Reivew: CSS Solution R0322 – Erroneous Switch Review: I0237 Clarifications
ANY OTHER DOCUMENTS	Schedule 30 – Resolution of Consumer Facing Switching and Billing Issues

17 GLOSSARY

TERM	DEFINITION
Consumer	means any person supplied (or seeking a supply) of Energy at an RMP (whether or not that person also exports or is seeking to export electricity at an RMP).
Data Item	means the most granular level of data defining a specific attribute in respect of a data type, the permissible values for which are defined and controlled in the Data Item Catalogue.
DI40213 – Status Response RET	Description of the status for RET files.
Energy Supplier	means a person which is either or both an Electricity Supplier and/or a Gas Supplier.
Erroneous Switch	means where a Consumer has been switched to an Energy Supplier which does not have an Energy Contract in place, as further described in the Resolution of Consumer-Facing Switching and Billing Issues Schedule.
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).

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).
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.
MPxN	means the collective description of the MPAN and MPRN when used together.
Switch	means a change to the Registered Supplier for an RMP.