RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

R0322 - ERRONEOUS SWITCH REVIEW: I0237 CLARIFICATIONS

On 21 August 2026, the Code Manager issued a consultation to industry to seek feedback on the Change Report (For Consultation) for R0322 – Erroneous Switch Review: I0237 Clarifications.

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
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RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Flo Monea

DATE CONSULTATION ISSUED	18/09/2026
RESPONSE DEADLINE	09/10/2026

Question 1:	Do you agree with the proposed solution? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous (Energy Supplier)	Yes, solution addresses nomenclature of the rec schedules.	Thank you for your comments.
E.On Next (Energy Supplier)	Yes, we agree.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	We are happy that the proposed solution represents the discussions that have taken place in the working group.	Thank you for your comments.
British Gas (Energy Supplier)	**Position**: We support the proposed solution, subject to further clarification of two operational points. The proposed terminology corrections, aligned reason-code descriptions, corrected cross references and clarification of the Erroneous Switch Flag should improve the clarity and consistency of the Erroneous Switch arrangements. **Key issues requiring clarification:** • The proposal corrects the DI40213 RET rejection description from four months to 24 months. The Code Manager should confirm how this aligns with the separate proposal for the Erroneous Transfer timeframe to be updated to 12 months. The final drafting or accompanying	Thank you for your comments. The correction of the D140213 RET rejection description was moved from R0313 to R0322 following a question in the R0322 impact assessment. The Code Manager recognised that the correction was potentially a technical update and as such should be included with the other updates to the Market Messages and Data Items. It is unlikely that R0313 will be approved for implementation at the same release as R0322 so the update from 24-12 months will be set out as part of the R0313

	guidance should explain the interaction between these requirements before implementation. • The proposal states that, once an Erroneous Switch has been identified, the Gaining Supplier should stop collecting and delete data obtained during the Erroneous Switch period, subject to relevant legal obligations. The Code Manager should clarify how this requirement operates where the data is needed for onward provision to the correct supplier, settlement, legal retention or other continuing market obligations. **Recommendation:** The final drafting or accompanying guidance should explain the interaction between these requirements before implementation.	solution as it develops. Having R0322 approved helps with that signposting. The Schedule 30 drafting on data retention relates to the REC only and is a clarification of existing obligations so is not changing the processes Energy Suppliers already follow. The REC does not set out the steps Parties should take to be compliant with another Code. Energy Suppliers should continue to ensure they remain compliant with the relevant Code, Licence or Legislation. The Code Manager is not planning on including a guidance document as part of this Change Proposal as the changes are clarifications only.

Question 2:	Do you agree with the proposed implementation approach BIG BANG? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous (Energy Supplier)	Yes, would not work otherwise	Thank you for your comments.
E.On Next (Energy Supplier)	Yes, we do.	Thank you for your comments.

SSE Energy Supply Limited (Energy Supplier)	Yes, SSE agrees with the proposed Big Bang approach.	Thank you for your comments.
British Gas (Energy Supplier)	**Position:** We support the proposed Big Bang implementation approach, subject to the outstanding operational clarifications being resolved before implementation. A coordinated implementation is appropriate for amendments intended to improve consistency across Schedule 30, Market Messages and Data Items. However, the Code Manager should confirm whether the data collection and deletion clarification requires any supplier system or process change. This is important because the requirement could affect data transfer, settlement and ongoing legal or market obligations. **Recommendation:** Any required operational or technical guidance should be issued with sufficient time for Energy Suppliers to assess and implement resulting changes.	Thank you for your comments. Please see the Code Manager's comments to Question 1.

Question 3:	Do you agree with the Code Manager's assessment of the costs and benefits for this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous (Energy Supplier)	I do, simple alterations	Thank you for your comments.

E.On Next (Energy Supplier)	Yes, we agree.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	Yes.	Thank you for your comments.
British Gas (Energy Supplier)	**Position**: We agree with the Code Manager's assessment of the costs and benefits based on the information currently available, subject to clarification of the potential operational impacts identified in this response. The costs assessment should be revisited if the clarification results in additional system, settlement or data-handling requirements for Energy Suppliers. The proposed corrections should deliver benefits through clearer terminology, more accurate cross references and greater consistency across the Erroneous Switch arrangements. The proposal is presented as involving minimal Party costs. However, it has not yet been established whether the requirement to stop collecting and delete data would require changes to supplier systems or operational processes. **Recommendation:** The costs assessment should be revisited if the clarification results in additional system, settlement or data-handling requirements for Energy Suppliers.	Thank you for your comments. As noted in the Code Manager comments to Question 1, the clarification on data handling is not a new obligation, as there is no requirement to revisit the business case calculations.

Question 4:	Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the Change Panel?

RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
Anonymous (Energy Supplier)	I do	Thank you for your comments.
E.On Next (Energy Supplier)	Yes, we do.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	Yes, SSE agrees with the assessment of the Change Path.	Thank you for your comments.
British Gas (Energy Supplier)	**Position**: We agree that R0322 should be subject to Self-Governance approval by the Change Panel. The proposal consists primarily of targeted corrections and clarifications to existing Erroneous Switch arrangements. On the information provided, the Self-Governance route is proportionate to the nature and scope of the change. The operational clarifications requested in this response should nevertheless be addressed as part of the final recommendation.	Thank you for your comments.

Question 5:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 26 February 2027? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous (Energy Supplier)	I do, earliest opportunity	Thank you for your comments.

E.On Next (Energy Supplier)	Yes.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	Yes, SSE agrees this change should be approved for implementation on 26 February 2027.	Thank you for your comments.
British Gas (Energy Supplier)	**Position**: We support implementation on 26 February 2027, subject to the outstanding operational clarifications being resolved early enough for Energy Suppliers to assess and implement any resulting process or system changes. The proposed date appears reasonable for the documentation and Data Item changes described. Our support is conditional because the practical impact of stopping collection and deleting data has not yet been confirmed. **Recommendation**: If clarification identifies a material supplier change, the Code Manager should confirm that the implementation date remains achievable and proportionate.	Thank you for your comments.

Question 6:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Anonymous (Energy Supplier)	Nope	Thank you for your comments.

E.On Next (Energy Supplier)	Not at this time.	Thank you for your comments.
SSE Energy Supply Limited (Energy Supplier)	No.	Thank you for your comments.
British Gas (Energy Supplier)	**Overall position**: We support R0322 in principle because the proposed corrections should improve the clarity and consistency of the Erroneous Switch arrangements. **We request explicit clarification on the following points:** • Timeframe alignment: confirm how the corrected 24-month RET rejection description aligns with the separate proposal for a 12-month Erroneous Transfer timeframe. • Data handling: explain how the Gaining Supplier should stop collecting and delete data while continuing to meet requirements for onward provision to the correct supplier, settlement, legal retention and other continuing market obligations. • MHHS operation: confirm how the requirement should be applied where suppliers cannot practically stop collection for only the Erroneous Switch period. These points should be resolved in the final drafting or supporting guidance to ensure the clarification is applied consistently and does not create unintended operational consequences.	Thank you for your comments. R0313 is not expected to progress for implementation at the February 2027 release so the 24-12 months update will be covered as part of the R0313 solution. R0322 is correcting an error. As set out in the Code Manager's comments, the data handling update is a clarification only as does not change the existing obligations Energy Suppliers have, including within other Codes.