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

CHANGE REPORT

R0336 LEGAL TEXT TO SUPPORT REC CHANGE R0180

DOCUMENT VERSION	V1.0
PROPOSED IMPLEMENTATION DATE	06 November 2026
IMPLEMENTATION APPROACH	Big Bang

RESPONSIBLE COMMITTEE	Technical Expert Panel	**CHANGE PATH**	Self-Governance
PRIORITISATION CATEGORY	Standard	**URGENCY**	Standard
IMPACTED STAKEHOLDERS	Energy Suppliers, Switching Operator, CSS Users		

LEAD ANALYST (SOLUTION LEAD)	TECHNICAL LEAD	SUBJECT MATTER EXPERT
CAROLINE FREIMULLER	FINN DEACON	GLENN SHEERN
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OVERVIEW

REC Change R0180 Clarity on use of on hold for switching issues, including the obligations of CSS Users implements a technical solution for the closure of certain ticket raised to the Switching Operator when no response has been received. This Change Proposal contains the legal text to support R0180.

RESPONSIBLE COMMITTEE DECISION

On 30 September 2026, the Technical Expert Panel voted, in line with the Code Manager's recommendation, to:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 06 November 2026.

RETAIL ENERGY CODE

CONTENTS

Responsible Committee Decision 1
1 Summary 3
2 Problem Statement 3
3 Impacts 3
4 Cross-Code Impacts 4
5 Proposal Plan 4
6 Prioritisation Category and Urgency 4
7 Proposed Solution 6
8 Draft Legal Text 7
9 Summary of Impact Assessment Activity 8
10 Risks, Assumptions, Issues and Dependencies 8
11 Business Case Assessment 8
12 Case for Change 9
13 Summary of Consultation Responses 10
14 Summary of Amendments Made Following Consultation 10
15 Appendix 11
16 Glossary 11

BACKGROUND

1 SUMMARY

REC Change R0180 Clarity on use of on hold for switching issues, including the obligations of CSS Users implements a technical solution for the closure of certain tickets raised to the Switching Operator when no response has been received. Full details of this technical change can be found on the R0180 portal page.

This Change Proposal contains the legal text to support R0180. R0180 was approved at the Technical Expert Panel (TEP) in March for November 2026 implementation. It has since been identified there should be supporting legal text included in that Change Proposal, to codify the obligations on and expectations of the Switching Operator and the technical solution.

This Change Proposal is expected to have no impact on REC Parties or the Switching Operator, as it only includes legal text for a technical change which has already been impact assessed and approved.

2 PROBLEM STATEMENT

R0180 Clarity on use of on hold for switching issues, including the obligations of CSS Users introduces a technical solution for the closure of certain tickets raised to the Switching Operator when no response has been received. Without supporting legal text, these obligations and expectations are not documented within the REC.

3 IMPACTS

CONSUMERS
None identified

REC SERVICE PROVIDERS
Switching Operator

REC PARTIES AND SERVICE USERS
Energy Suppliers
CSS Users

REC DOCUMENTS / PRODUCTS
Schedule 26 – Switching Service Management
Switching Operator Service Definition

MHHS
There are no impacts to MHHS from this Change Proposal.

4 CROSS-CODE IMPACTS

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

5 PROPOSAL PLAN

Milestone	Activity	From	To
Change Proposal		**20 Jul 26**	**27 Oct 26**
	Code Manager Initial Assessment	July	August
	Legal Review	July	August
	Business Case Assessment	August	August
	Consultation	September	October
	Solution Refinement	October	October
	Final Determination	October	October
Voting		**28 Oct 26**	**28 Oct 26**
	Appeal Window	29 Oct 26	12 Nov 26

The Code Manager aims to bring this Change Proposal for final vote to the September TEP meeting, as a vote at the October TEP meeting means the appeal window closes post implementation. However, the Code Manager believes it is important to allow adequate time for consultation and solution refinement from any comments at the consultation so does not want to propose a timetable shorter than that above.

6 PRIORITISATION CATEGORY AND URGENCY

6.1 PROPOSER REVIEW

The Code Manager is the Proposer of this Change Proposal, so the review of Urgency Status and Prioritisation Category can be found in Section 6.2 of this Change Report.

Their review can found in the initial submission form here.

6.2 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 weak alignment to the Strategic Direction Statement as it has no SDS relevance when compared to other Standard changes;
- Has high importance as it must be delivered in the November 2026 release so the solution for approved technical change R0180 Clarity on use of on hold for switching issues, including the obligations of CSS Users is complete; and

- Has a low complexity as it has been submitted with a fully formed solution to support a technical solution which is already approved.

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SOLUTION

7 PROPOSED SOLUTION

This Change Proposal will make amendments to Schedule 26 – Switching Service Management and the Switching Operator Service Definition.

The proposed change to Schedule 26 – Switching Service Management is the introduction of a new clause as below:

6.4 If the Switching Operator does not receive a response to queries it has raised in respect of certain priorities of Switching Incidents, then the Switching Operator may place them on hold while a response is awaited, and may ultimately close them without resolution, as further described in the Switching Operator Service Definition.

The proposed changes to the Switching Operator Service Definition are the introduction of new clauses within the Description of Service section, of the Switching Service Desk as below:

1.8A The following process allows for the closure of tickets without the resolution of the Switching Incident raised in that ticket. This process only applies to tickets relating to priority 3 and priority 4 incidents (as identified in Paragraph 5), and does not apply to the types of ticket identified in Paragraph 1.8B. The process is as follows:

- *(a) the Switching Operator may place a ticket on hold while it is awaiting a response from the user which submitted the ticket;*
- *(b) the Switching Operator shall send an email to notify the user which submitted the ticket to notify them that the ticket has been placed on hold;*
- *(c) for priority 3 incidents, if no response has been received from the user within 15 Working Days following the notification under sub-paragraph (b), then the Switching Operator shall send the user a further email notifying the user that the ticket is due to be closed in 15 Working Days if no response is received by then;*
- *(d) for priority 4 incidents, if no response has been received from the user within 25 Working Days following the notification under Paragraph 1.8A(b), then the Switching Operator shall send the user a further email notifying the user that the ticket is due to be closed in 15 Working Days if no response is received by then;*
- *(e) if no response is received from the user within the first 10 Working Days following the notice under sub-paragraph (c) or (d) above, the Switching Operator shall send the user a final email notifying the user that the ticket will be closed in 5 Working Days if no response is received by then;*
- *(f) if no response is received from the user by the end of the period under sub-paragraph (e) above, then the Switching Operator ticket shall close the ticket; and*
- *(g) the user has 3 Working Days from the ticket being closed in which the ticket can be reopened at the user's request, otherwise the user must raise a new ticket.*

1.8B The following tickets are excluded from the process under Paragraph 1.8A:

- *(a) those which relate to a CSS Certificate, an Operational Switching Service Change or a Switching Problem;*
- *(b) those which are awaiting a data fix; or*

(c) those which have a related child or parent ticket which is not within the scope of Paragraph 1.8A.

8 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0336 can be found:

- Schedule 26 Switching Service Management
- Switching Operator Service Definition

RETAIL ENERGY CODE

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

No Party impact assessment was conducted as part of this Change Proposal.

10 RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

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

11 BUSINESS CASE ASSESSMENT

11.1 COSTS

There are no central system costs identified with this Change Proposal.

The Code Manager anticipates there will be no Party costs associated with this Change Proposal, and this will be validated at consultation.

11.2 BENEFITS

INTANGIBLE BENEFITS	BENEFITS DESCRIPTION
CODIFY THE OBLIGATIONS ON THE SWITCHING OPERATOR UNDER R0180	Without the implementation of this Change Proposal, the changes and obligations being made under R0180 are not codified. This Change Proposal completes the solution as proposed under R0180 by making sure obligations are clearly laid out and provides the backing legal drafting for Parties to refer back to when interacting with the new functionality being proposed under R0180.
ENSURE PARTIES HAVE A REFERENCE POINT FOR THE CHANGES MADE UNDER R0180	Without the implementation of this Change Proposal, there is no reference point for these changes for Parties to refer to. This legal drafting clearly defines the steps taken by the Switching Operator and provides Parties with the timescales in which they must respond to tickets or they will be closed by the Switching Operator. Without this legal drafting, these timescales will not be available for Parties to refer to outside of the change documentation created under R0180.

11.3 COST BENEFIT ANALYSIS

As there are no central system or Party costs and two intangible benefits associated with this Change Proposal, 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 central systems or Party costs;
- Has proportionate effort required for implementation;
- Codifies the technical changes being made under R0180 Clarity on use of on hold for switching issues, including the obligations of CSS Users; and
- Ensures there is clear Code text for Parties to refer to in the future around the functionality they should expect in relation to on hold tickets.

13 SUMMARY OF CONSULTATION RESPONSES

A consultation was circulated on 21 August – 14 September 2026 to obtain views on the Change Report (For Consultation). In total one response was received from one Energy Supplier. The key themes from this response have been summarised and set out below. The non-confidential responses have been published here.

13.1 SUMMARY OF RESPONSES

The respondent supported the proposed solution and agreed that the legal text supports the proposed process for R0180. The respondent agreed with the Code Manager's assessment of the cost and benefits of this change. The respondent supported the proposed implementation approach of big bang as well as that R0336 should be implemented in line with R0180, on 06 November 2026.

No further comments were raised related to this Change Proposal.

14 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

No amendments were made following consultation.

15 APPENDIX

CHANGE PROPOSAL	Link
LEGAL DRAFTING	Schedule 26 Switching Service Management Switching Operator Service Definition
CONSOLIDATED CONSULTATION RESPONSES	Link
RELATED CHANGE(S)	R0180 Clarity on use of on hold for switching issues, including the obligations of CSS Users

16 GLOSSARY

TERM	DEFINITION
CSS User	means each organisation which is Qualified to use the CSS, together with each Switching Data Service Provider (other than the CSS Provider) the categories of which are set out in the Central Switching Service Schedule.
Service Definition	means each document of that name forming part of the Technical Specification.
Switching Operator	means the DCC in performing the role of managing the co-ordination of the CSS Provider and the other Switching Data Service Providers, including the mechanisms for CSS Users to report incidents and access service management support, from the CSS Go-Live Date.
Switching Service Desk	means the service desk made available by the Switching Operator in accordance with the Switching Service Management Schedule.