I0237 Technical Change Workshop Meeting 6

Meeting Notes

MEETING	**I0237 TCW Meeting 6**
DATE	**8 October 2026 (10:00–12:00)**
LOCATION	**Microsoft Teams**

Presenter	Representing	Initials	Role
Finn Deacon	REC Code Manager	FD	Chair / Solution Lead
Lorna Mallon	REC Code Manager	LM	Regulatory Specialist
Florentina Monea	REC Code Manager	FM	Code Manager
April Harbour	RECCo	AH	Market Design Lead
Richard Jelliss	REC Code Manager	RJ	Code Manager

Full attendee list available from the Teams meeting record.

Context and position at the start of TCW6

TCW6 built on the proposed Erroneous Switch (ES) resolution process developed through the preceding workshops, particularly TCWs 3–5. Those discussions had established a preferred direction for supplier messaging, the information exchanged between parties, response timescales and the interaction with the Central Switching Service (CSS). TCW6 reviewed that position and explored how the process should operate in more complex circumstances.

Position developed through previous workshops

TCWs 3 and 4 had progressed the proposed sequence of initiation, determination and response messages, including the information needed to identify the affected meter point, suppliers and registration period. The preferred approach included mandatory meter point and supplier identifiers, retention of the Original Supply Start Date (SSD) and defined reasons for requesting and determining an ES. The proposed determination timescales were five Working Days where the responding party was the ES Losing Supplier and eight Working Days where it was the ES Gaining Supplier, with non-response leading to automatic acceptance.

TCW5 had developed the interaction with CSS, including CSS initiating any required corrective registration following an accepted ES. The earlier discussions also highlighted the need to preserve legitimate subsequent switches and customer choice. TCW6 needed to establish how those principles would apply to historic erroneous periods, customers who had already returned and competing registrations.

Recap presented at the start of TCW6

The Code Manager presented a recap of four areas developed through previous workshops: the ES process, data architecture, enumeration values and re-registration. The workshop slides set out the proposed design assumptions, message payloads and process maps. Slido questions invited

suppliers to confirm whether these accurately reflected the previous discussions and to raise challenges or corrections.

The recap also sought confirmation of the proposed minimum, default and maximum Working Day values used to derive the corrective SSD. It raised the outstanding question of how CSS should identify the relevant registration period and presented the proposed approach to CSS validation and corrective registration. The later themes tested these assumptions against concurrent switches, historic cases and other exceptions.

Clarifications and outstanding design assumptions

Acceptance and corrective registration. The discussion distinguished acceptance of an ES from the need for corrective registration. TCW6 supported resolving a valid erroneous period without re-registration where an appropriate subsequent switch had already occurred.

Message processing and eligibility. Successful processing of an incoming message would not, by itself, confirm that the ES could progress to corrective registration. Further registration-state checks could be needed; their detailed timing and scope remained to be defined.

Customer choice and competing registrations. Legitimate subsequent switches and customer choice needed to be protected. The detailed treatment of new requests received during determination remained open for further technical consideration.

Data and process alignment. The recap identified corrections or further work on Reason for Return in determination messages, registration-period identification, the proxy objection window and registration indicators. These points are recorded in the relevant sections below.

Status of workshop positions. Support recorded during the workshop represented a developing design position, subject to detailed design, impact assessment and formal REC governance. It did not constitute final approval of the technical implementation or REC requirements.

The sections below record the discussion, clarifications, areas of support and actions arising during TCW6.

1 Introductions and agenda

The Code Manager opened the sixth TCW for I0237 Erroneous Switch Review. The first part reviewed the design assumptions to date. The second considered design themes, gaps and outstanding cases, particularly concurrent switches and registration conflicts. Slido was used to gather supplier views.

2 Review of the design to date

Slido 1 Do you agree with the design assumptions to date?

Slido result: two responses, 100% yes.

The group retained sequential ES Initiation, ES Determination and ES Response as the design basis. Either relevant supplier can initiate. ES Gaining and ES Losing Supplier identify the parties to the original error; ordinary gaining/losing terms remain for the subsequent registration.

The proposed determination periods remain five Working Days for the ES Losing Supplier and eight for the ES Gaining Supplier, with CSS auto-acceptance where no determination is received within the applicable period.

CSS sends an accepted ES Response to both suppliers. A rejected response goes to the initiating supplier. The later themes qualify whether an accepted ES requires re-registration.

2.1 Data architecture

How should validation determine whether the ES relates to an active or inactive registration? CSS will not validate against the Original SSD. Could an identifier be used instead?

Supplier representatives raised transfers between MPIDs within the same supplier company and cases where a change of supplier was already in progress, or the customer had already returned, but the earlier erroneous period still needed resolution.

How many Working Days to the new SSD parameter? Do you agree with three Working Days minimum and five maximum?

Slido result: two responses, 100% yes.

Do you agree that the SSD CSS default should align with the minimum of three Working Days?

Slido result: four responses, 100% yes.

Do you agree with the design assumptions for the first part of the data architecture?

Slido result: two responses, 100% yes.

The recap described the MPXN, both supplier MPIDs and Original SSD as mandatory and immutable. Consumer Email Address and Additional Information remain optional. The parsed REL-style address can be corrected at determination without preventing an otherwise valid ES from being accepted.

Outcome or design assumption	Action
Consider these cases in Theme 2. The registration-period identification mechanism remains to be developed; no new identifier or Original SSD validation rule was agreed.	No additional action recorded for this item.

2.2 Message payload data items

Do you agree with the design assumptions for the Message Payload Data Items?

A supplier representative queried whether the supplier that lost the MPXN should have a rejection option. The Code Manager explained the need to address disputed information and noted that the combined flow includes the non-domestic expired/no-valid-contract case. This did not settle all permitted domestic rejection circumstances.

A supplier representative challenged why an incorrect Reason for Return could not be changed. The Code Manager confirmed that the ES Gaining Supplier should be able to amend it at determination; the ES Losing Supplier should not. The Code Manager distinguished this from Reason for Rejection and identified that Reason for Return had not been carried into the determination payload table.

Outcome or design assumption	Action
Design assumptions supported subject to correcting the determination payload to include Reason for Return and the ES Gaining Supplier's update permission. The transcript confirms the supplier scenario; the precise Scenario Variant identifier still needs checking in the payload specification.	Update the determination payload slides/data rules and confirm the relevant Scenario Variant. The Code Manager indicated a correction was being made during the meeting; ensure it appears in the consolidated version.

2.3 Enumeration values

Do you agree with the design assumptions for the Enumeration Values?

The recap retained Reason for Return A–E and use of the Domestic Premises Indicator held in CSS. Technical Issue was described as limited to split or incorrectly related electricity MPANs. The Code Manager clarified that R0332 addresses the meaning of Technical Issue; its longer-term retention was not conclusively settled.

A supplier representative challenged whether an expired non-domestic contract should prevent return where variable rates could apply. The Code Manager clarified that rejection was an available option, rather than compulsory. The Code Manager agreed that licence and consumer-treatment implications should be explored with Ofgem. Otherwise, the meeting record notes agreement with the enumeration assumptions.

Outcome or design assumption	Action
Further design work identified in the discussion.	Discuss with Ofgem the licence implications of ES Losing Supplier rejections where the non-domestic contract has expired, including variable-rate returns, and bring the position back.

2.4 CSS Standard Body Response

Do you support the principle that CSS should check both the incoming message and, where required, whether the ES is eligible to progress, including to re-registration?

The meeting notes and transcript record 100% support. The number of respondents needs to be confirmed.

The Code Manager distinguished valid-message processing from eligibility to progress. A valid message may be blocked by registration conditions, lead to recognition of the erroneous period without re-registration, or progress through the standard corrective route. Detailed technical rules were not being approved at this point.

What scenarios, concerns or requirements should we consider when applying this principle?

No additional contributions to this question were recorded; the later themes developed the relevant scenarios.

Outcome or design assumption	Action
Carry forward the principle of message validation and further eligibility/state checks where required. Reuse of the Standard Body Response does not itself prove end-to-end ES completion.	No additional action recorded for this item.

2.5 Re-registration

Do you agree with the design assumptions for the re-registration process?

The group supported the re-registration assumptions. The meeting notes record two responses, while the transcript records the chair announcing three yes votes. The final count needs to be checked against Slido.

CSS progresses corrective registration after an accepted ES where re-registration is appropriate. The design presented excludes supplier objections/interventions and withdrawal, annulment or cancellation once in re-registration.

A supplier representative asked whether new Market Message identifiers would replace existing D0301/RET references. The Code Manager confirmed that moving the messaging into CSS requires new identifiers; the final codes were not yet available.

The Code Manager clarified that the three-Working-Day minimum removes the need for the previously retained proxy objection window. A new Registration Initiator enumeration is needed for CSS-initiated correction. The Erroneous Switch Resolution Indicator wording/true-false mapping needs to be reconciled with these clarifications.

Outcome or design assumption	Action
Further design work identified in the discussion.	Align the process maps, proxy-window wording, notification indicators and new message identifiers with the clarified design.

3 Design themes and outstanding cases

3.1 ES timing and forward Supply Start Date

Participants supported carrying forward the five/eight-Working-Day determination periods across domestic and non-domestic cases, and the three-to-five-Working-Day forward SSD parameter.

The Code Manager clarified that the Working Day parameter is mandatory in the relevant ES Gaining Supplier message. CSS derives the default for auto-acceptance following no determination; it is not a general fallback for an omitted mandatory field.

Outcome or design assumption	Action
Carry forward the supported timing assumptions, including the three-Working-Day CSS default and the conditions under which it applies.	Record the supported baseline assumptions and associated open points in the design tracker.

3.2 Concurrent switches and registration conflicts

Scenario B1 A later switch has completed with a third supplier

The preference was to resolve the erroneous period between the two ES suppliers without disturbing the customer's completed valid switch. A supplier representative preferred agreement between those suppliers rather than unilateral flagging by the supplier that made the error.

Outcome or design assumption	Action
CSS should be capable of progressing an accepted, valid ES without resulting in re-registration. The historic period still needs to be recorded for assurance and reporting.	No additional action recorded for this item.

Scenario B2 The customer has returned or is returning to the ES Losing Supplier

The group supported retaining the ES process to resolve the erroneous period, including where the customer has already returned. Further work is needed on whether a pending normal switch

should take precedence, the effect on previous contract terms and whether it returns the customer sooner than the corrective registration.

Outcome or design assumption	Action
Further design work identified in the discussion.	Review the complexity introduced for CSS validation. Develop the use case and establish how MPIDs, Original SSD or another identifier identify the relevant registration period. Do not assume that the same company name means the same MPID or period.

Scenario C A new switch request arrives during ES determination

Consumer choice remains the guiding principle, while CSS must still be capable of resolving the ES. The CSS System Operator favoured rejecting a new request to simplify roles, dates and outcomes. The Code Manager and supplier representatives raised the detriment of stopping a legitimate switch, including differences between a third supplier and a return to the original supplier.

Outcome or design assumption	Action
The earlier CSS validation principle applies: registration state must be checked as the ES progresses. This does not settle a blanket accept/reject rule for requests received during determination; the detailed options remain open.	Bring back options covering the determination stage, same-supplier and third-supplier requests, contractual terms and technical complexity.

Scenario D The ES is accepted and corrective registration is progressing

The exact state/event boundary needs technical definition, including the interval before final ES responses are issued. This does not resolve the earlier determination-stage question.

Outcome or design assumption	Action
Retain pending-switch rejection controls. Where an accepted ES is valid to progress to re-registration, the technical solution should initiate the pending registration alongside acceptance so a competing request cannot fall between ES acceptance and the registration controls taking effect.	No additional action recorded for this item.

Scenario E The ES is identified outside the prescribed period

The discussion favoured alignment with REC obligations and consistent supplier treatment. Additional reporting outside the prescribed period was not established as a requirement. SDEP can support bilateral discussion of genuine cases identified outside that period.

The Code Manager noted the complication of cases first raised within time but previously rejected. This requires consideration in the detailed rule.

Outcome or design assumption	Action
Take forward technical rejection of ES initiation outside the applicable eligibility period. Change 0313, cited as R0313 in the meeting notes, will drive the threshold and supplier obligations outside it. The current 24-month period was discussed; no replacement threshold was approved by this TCW.	Record the dependency on change 0313. Scope review of SDEP process types and bilateral handling for a future session, obtain supplier agreement in principle and use that to inform discussion with the EES provider.

3.3 Non-standard ES scenarios and edge cases

The group recognised no-valid-contract cases, MHHS market-segment constraints, SoLR, acquisition and MPID changes as relevant operational/code issues. These do not all require a bespoke CSS function, but the customer outcome must still be defined.

The Code Manager is monitoring prepayment credit-transfer and payment-assignment work so the interfaces can be assessed together once the designs are sufficiently mature. No mandatory delivery dependency was established in the discussion.

Outcome or design assumption	Action
Further design work identified in the discussion.	Detail the operational treatment through REC legal-text drafting and assess the interfaces with related workstreams. Confirm the related change identifiers from the controlled materials.

3.4 Rejected ES cases and exception resolution

Standard rejection disagreement and subsequent bilateral resolution

The running assumption is that rejection closes the CSS ES instance and it cannot be reopened. Suppliers use existing bilateral routes to resolve disagreement. If they subsequently agree the ES, a new initiation brings the outcome back into CSS.

A supplier representative asked whether the REC should stipulate who re-initiates and when. The Code Manager confirmed that this should form part of legal-text drafting so appropriate obligations and assurance are in place. A bilateral agreement does not itself update CSS.

Outcome or design assumption	Action
Retain no reopening of a closed instance as the technical design assumption, with a new initiation following subsequent bilateral agreement under the proposed approach.	Record the re-initiation requirement for REC legal-text development and ratification through Party Impact Assessment, including responsibility, timing and the effect of any eligibility threshold.

Customer Service Returns

A supplier representative challenged the proposed removal, describing goodwill returns and cases where evidence of cancellation is difficult to retrieve. The Code Manager explained that earlier working-group discussions favoured exclusion because a CSR is not necessarily an ES, suppliers use it differently and automatic acceptance is not suitable for all such cases.

Genuine cancellation-not-actioned cases should use the relevant ES reason. Other complaints/goodwill cases need an alternative route. A supplier representative also raised guaranteed-standards reporting implications; the Code Manager said the earlier approach had been discussed with Ofgem.

Outcome or design assumption	Action
Retain exclusion of a separate CSR route as a design assumption for I0237, subject to impact assessment. CSR has not already been abolished by this workshop.	Define obligations for CSR-type cases handled outside the ES process and ask explicitly through impact assessment whether CSR should remain included. Capture the operational, evidence and reporting impacts.

3.5 Data quality validation and information exchange

The group did not complete this as a separate theme. Relevant points arose earlier, but this theme remains for a future session.

3.6 Consequential industry assurance and code impacts

The group did not complete this theme. The Code Manager briefly reiterated the need for assurance and evidence supporting REC obligations and rejection handling. The remaining consequential matters are to return at a future session.

Outcome or design assumption	Action
Further design work identified in the discussion.	Carry the unfinished Themes 5 and 6 into the next agenda and confirm the outstanding questions and required participants.

4 Outstanding clarifications

Confirm the precise Scenario Variant for Reason for Return, reconcile the re-registration Slido count and confirm the final notification-indicator wording. The relevant discussion and actions are recorded above. Individual action owners and deadlines were not confirmed in the meeting record.

5 Date and time of next meeting

The Code Manager confirmed that the next meeting details would follow and that unfinished themes would be carried forward. No next-meeting date was confirmed during the session.