I0237 Closed DCC Technical Change Workshop

Meeting Notes

MEETING	**I0237 closed DCC technical session**
DATE	**21 October 2026**
LOCATION	**Microsoft Teams**

Participant	Representing	Initials	Contribution in session
Finn Deacon	REC Code Manager	FD	Chair
April Harbour	RECCo	AH	Design presentation
Lorna Mallon	REC Code Manager	LM	Regulatory and legal clarification
Richard Jelliss	REC Code Manager	RJ	Technical Services discussion
Leo Brown	REC Code Manager	LB	CSS process
Kit Ho	DCC	KH	CSS technical review
Bish Aich	DCC	BA	Technical architecture
Eve Wilson	DCC	EW	DCC coordination
Connal Plant	DCC	CP	DCC coordination

Participants identified from the meeting transcript. Contributions above describe this session rather than formal job titles.

Context and position entering the session

This closed session followed the six supplier TCWs and tested the technical feasibility and proportionality of the proposed Erroneous Switch (ES) process with DCC. TCW6 had supported separating ES resolution from corrective registration, so an accepted ES would not always return the meter point. The discussion therefore focused on Central Switching Service (CSS) validation, registration history, concurrent switches and the information needed for reporting.

The session supported further development using both synchronous message validation and asynchronous processing. It did not approve a complete architecture, detailed business rules, cost or delivery plan. DCC needed to consolidate its understanding and review more detailed process maps before confirming feasibility. Wider supplier engagement and formal impact assessment remained necessary.

1 Purpose and recap of the design

The Code Manager explained that the purpose was to identify what the proposed design would require from CSS, where it might become disproportionately complex and which assumptions needed to change before further industry engagement. The discussion sought an early technical view rather than a detailed solution or implementation estimate.

The recap covered sequential ES Initiation, Determination and Response messages, the proposed five/eight-Working-Day determination periods, data architecture, simplified enumeration values and reuse of existing switching mechanics for any corrective registration. The Code Manager stressed that the design reflected a small participating supplier group and still required wider ratification. A CHIG discussion was planned in approximately two weeks; no final approval was recorded.

1.1 Related MPANs and the scope of the return

DCC raised related electricity MPANs and an erroneous switch arising from an OFAF switch. The Code Manager's view was that the return would be an individual MPAN transaction rather than use the bulk OFAF switching rules. For a valid related-meter relationship, initiation should be through the primary MPAN and the related points should move together using the existing switching approach. An incorrect relationship would need to be corrected before the ES was raised.

Outstanding point. Whether CSS should also create a linked ES instance for the secondary MPAN, and how messages and responses would follow that relationship, remained for detailed design. The discussion did not approve a new set of related-meter business rules.

Design follow-up for Code Manager and DCC. Define the primary/secondary message sequence and required checks, and reflect supplier prerequisites in the legal text.

1.2 Dependencies and operational exceptions

DCC raised the interaction with R0178. The Code Manager also identified R0096 as relevant to the architecture and orchestration approach. The design needed to account for changes not yet implemented, assess consequential effects on existing business rules and formalise dependencies through impact assessment.

Participants recognised that some retired-MPID, supplier-exit or successor-party cases might need a route outside the core technical process, potentially using normal switching arrangements. This was an option to develop, not a blanket decision that all exceptions would use a standard switch. The Code Manager expected substantial legal-text work in Schedule 30 to define the required outcome and responsible party where CSS could not resolve a case.

Design follow-up for Code Manager, informed by DCC. Maintain the technical dependencies and develop the operational/legal route for exceptions that the agreed CSS design will not support.

2 CSS validation architecture

The Code Manager presented three possible outcomes: the ES cannot progress; the ES is accepted or resolved without re-registration; or the ES is accepted and can progress to re-registration. A successful Standard Body Response confirms message processing at that point and does not, by itself, establish the final ES or registration outcome.

DCC supported asynchronous processing as part of the lifecycle, including the period waiting for a supplier determination. It also cautioned that the design would use a mixture of synchronous and asynchronous handling according to the message and processing required. The discussion did not conclude that every eligibility check must be asynchronous or approve the particular validation boxes on the slides.

Technical consideration. DCC highlighted retention and replay as matters for the architecture review. The detailed message interfaces, process states and associated business rules would need to be mapped before the implementation approach could be confirmed.

2.1 When registration state must be checked

The Code Manager asked whether eligibility should be reassessed at defined points such as initiation, determination and acceptance, or through continuous/event-driven checking. The Code Manager explained that ordinary switching did not continuously revalidate all business rules: some checks occurred before gate closure, but changes during a switch could still leave it unable to progress. Continuous monitoring should therefore not be assumed to be existing CSS behaviour.

Working direction. Further checks would need to identify changes that alter the route or prevent progression. The exact triggers, ordering and boundary before corrective registration remained open. The group favoured drawing the scenarios and transitions in detail so DCC could establish how CSS should respond.

Design follow-up for Code Manager and DCC. Map the lifecycle states, changes that affect eligibility and checks required before each progression decision. DCC to review the resulting sequence and identify which checks are synchronous or asynchronous.

2.2 Message performance and SLA measurement

The Code Manager highlighted that CSS message-performance SLAs normally relate to short processing intervals, whereas this process could wait several Working Days for a supplier response. An auto-acceptance or other scheduled event could trigger an outgoing message without a new incoming message against which to measure performance.

Outstanding point. The design must distinguish the supplier determination window from CSS processing and message-performance measures. It needs to define the event that starts each timer, the required response and the applicable gate-closure treatment. Illustrative discussion of a process taking one day or around ten Working Days was not an agreed end-to-end SLA.

Design follow-up for Code Manager and DCC. Overlay timing and performance requirements on the process maps, including timeout/auto-acceptance triggers, and assess whether existing CSS SLA definitions are sufficient.

3 Accepted ES without corrective registration

The discussion distinguished agreement that a historic supply period was erroneous from the separate decision to return the meter point. Where a customer had legitimately moved on, the ES process could still obtain supplier agreement and support reporting without undoing the later switch. The ES Gaining and ES Losing Supplier labels would continue to identify the original parties; normal gaining/losing terminology would apply when a corrective registration was actually initiated.

DCC view. DCC said holding the information appeared technically possible if the necessary data were supplied, but required clear scenarios, data and reporting requirements before complexity could be assessed. This was an initial feasibility view rather than confirmation of a complete solution.

3.1 Proposed supplier flag and reporting record

Participants explored an indicator in the initiation message to show that no re-registration was intended. This could help identify a historic-only route at the outset. The proposal did not remove the need for CSS validation or for reassessment if registration circumstances changed. Its mandatory/optional status, meaning and absence/default behaviour were not finalised.

A separate service-request route was considered, but the discussion favoured retaining ES handling and reporting within CSS to avoid fragmented processes and manual reporting. The Code Manager linked the benefit to consistent gas/electricity participation, guaranteed-standards evidence and address-data quality.

The existing switch flag supports reporting derived from the original SSD and subsequent return. Participants explained that CSS did not currently hold the proposed distinct marker identifying any

historic registration period as erroneous. DCC left open whether the new information should sit in a separate ES history or use existing transaction-history mechanisms.

Design follow-up for Code Manager and DCC. Define the period to be identified, the evidence of acceptance, required data and reports, and whether a supplier indicator is needed. Keep a rejected ES distinct from an accepted erroneous period for which corrective registration cannot proceed.

3.2 Forward SSD and completion

The Code Manager noted that the Working-Day-to-SSD data item was currently mandatory in the relevant ES Gaining Supplier message. If the request was explicitly for a historic period without a return, that requirement would need conditional treatment to avoid implying a future registration. The field rules and final response content were not settled.

Design follow-up for Code Manager and DCC. Review the payload conditions for cases without re-registration, the formal completion outcome and the information retained for reporting. The proposed historic-only indicator must be distinguished from the existing ES Resolution Indicator used in registration messaging.

4 Concurrent switches and registration precedence

The Code Manager presented five scenarios from the closed-session deck. Consumer choice remained the guiding principle, while the technical treatment depended on whether corrective registration had actually entered Pending. Participants considered separating the ES lifecycle state from the registration lifecycle to avoid applying pending-registration restrictions too early. An “ES pending” state was an example raised for consideration, not an approved state.

Scenario	Discussion and working direction
A Subsequent switch already completed	Progress the ES for the erroneous period without reversing the customer’s later valid switch. Identification and reporting requirements still need to be defined.
B Registration pending when ES is initiated	Allow the ES discussion to continue while preserving the customer’s pending switch. Define the effect if that switch completes during determination and whether a return remains appropriate.
C New switch arrives during the ES process	Before corrective registration is established, the new switch could take precedence while the ES continues without a return. This remained a design direction requiring a precise sequence and business rules.
D ES accepted and corrective registration pending	Once a Pending Registration exists, apply existing pending-switch controls to competing requests. Define the exact acceptance-to-Pending transition and avoid a gap in protection.
E Corrective registration completed	Resume normal switching treatment. A subsequent switch should follow the usual process without additional ES-specific restrictions.

DCC asked for sequence diagrams showing what had already been sent to suppliers and the registration state when a competing request arrived. A generic “accepted ES” label was insufficient to determine whether the new switch should proceed. No general permission to cancel an established corrective registration was agreed.

Design follow-up for Code Manager and DCC. Draw the scenarios with separate ES and registration states, message order, reassessment points and the transition into Pending Registration. DCC to validate its understanding against the Code Manager's intended outcomes.

5 Registration identification and MPID changes

DCC confirmed that CSS manages registrations at Market Participant Identifier (MPID) level. MPXN and the two ES supplier MPIDs were discussed as the starting identifiers. Matching a period would not prove it was erroneous; supplier determination would establish acceptance or rejection. A historic match might also exist where a former supplier was no longer an active CSS user, preventing the next process step.

For the straightforward return, DCC described checking the current active and immediately preceding registration. The Code Manager also described a historic-only route where a relevant inactive period could be matched, and rejection where no relevant registration existed. DCC raised the risk that the same MPID pair could appear in several genuine switches and later referred again to the current/last inactive pair. The scope and uniqueness of deeper historic matching therefore remained to be confirmed; a definitive search algorithm was not agreed.

Outstanding point. Original SSD had previously been included for supplier information without CSS validation. The session reopened whether it or another identifier might help distinguish periods. No final decision was taken to validate Original SSD or introduce a new supplier-facing identifier.

5.1 Returning to a different MPID within the same supplier company

Participants considered a supplier that had moved a portfolio to a different MPID, including changes associated with MHHS. Treating the company as the same organisation would not automatically give CSS a registration against the replacement MPID. Company/group information and switching operational data were discussed, but their availability and suitability were not established.

DCC's initial view was that extending matching to company level could be too complex and needed further exploration. It clarified that an existing historic registration retained its recorded MPID; a later registration under a new MPID would not automatically rewrite the earlier record. An alternative operational route might be more proportionate, depending on volumes and benefit.

Design follow-up for Code Manager and DCC. Test the identification rules against repeat switches, portfolio migrations and exited/non-participating suppliers. Establish the available history and identifiers, assess the frequency of exceptions through impact assessment and define the legal/operational route for unsupported cases.

5.2 Internal transfers within one supplier company

This was distinguished from returning to another supplier whose portfolio had moved. Participants noted examples of the existing ES flag being used between two MPIDs in the same company. The regulatory view was that the ES route was not intended for an entirely internal correction, but a new company-group validation rule was not sought. Reporting could identify such use for review.

Follow-up for Code Manager. Review the cross-metering legal provisions as a possible precedent for the intended restriction and reflect the appropriate scope in ES legal drafting. No new technical hard rejection was agreed.

6 Time limit and cases previously rejected

The TCW6 working position was to reject initiation outside the prescribed period, discussed as 24 months. The session identified change 0313 as the dependency governing the intended time limit. The discussion did not approve a replacement threshold or establish which date/event CSS should use to calculate it.

The Code Manager challenged a simple hard-coded rule using a case first raised within time, rejected, then re-initiated after bilateral resolution outside the threshold. An illustrative nine-month initiation and thirteen-month retry assumed a possible twelve-month limit; those figures were examples, not an agreed rule. The need for reporting was emphasised, while the benefit and complexity of enforcing the threshold technically were questioned.

Position at close. Later discussion restated the earlier preference for rejecting out-of-time requests, including the question of historic reporting without a return. The earlier exception and alignment with change 0313 remained unresolved. The session therefore did not close the rejection rule or replace the TCW6 assumption with a settled exemption.

Design follow-up for Code Manager, with DCC assessment. Align the threshold, calculation event, repeat-initiation treatment and outside-process obligations with change 0313. Confirm whether reporting and technical eligibility use the same window and how exceptions would be handled.

7 Messaging and implementation complexity

The group briefly considered expanding MM90071 error codes, titles and descriptions for the new ES messages. The Code Manager clarified that later asynchronous outcomes needed to cover success as well as failure. Additional status/outcome messages, reason codes, recipients and the handling of a failed Pending Registration creation were not designed in this session.

The architectural options on the slides were prompts for further assessment. No option was selected, costed or assigned a delivery timescale. Existing CSS impacts, persistence, retention/replay and interdependencies would need to be assessed once the lifecycle and message sequences were clearer.

Design follow-up for Code Manager and DCC. Use the detailed maps to specify the synchronous acknowledgement, subsequent outcome notifications and recovery requirements, then assess the proportionate architecture and consequential impacts.

8 Agreed next steps

Action for Code Manager and DCC. The Code Manager would pull together a more detailed view of the process and scenarios, with DCC input, so the high-level structure and intended outcomes could be checked before progressing the design. This was the immediate next step rather than attempting to settle every business rule in the workshop.

Action for DCC. DCC would meet internally to consolidate its understanding, including the concurrent-switching scenarios, and compare that documented view with the Code Manager team. DCC needed to agree timing internally before confirming when it could share material and arrange a further discussion. No response date was committed.

Action for chair. The chair committed to circulate the session materials to DCC by the end of 21 October.

Coordination. An internal Code Manager call was planned for the following day to agree next steps. Wider supplier and market-participant engagement could continue alongside the DCC technical review, including the planned CHIG discussion. No further closed-session date was agreed.