

PARTY IMPACT ASSESSMENT RESPONSE

I0331 REGULATORY ALLIANCE CREATION REJECTIONS

DATE ISSUED	04 September 2026
RESPONSE DEADLINE	25 September 2026

LINKS

- [Change Proposal page](#)

The completed response document should be uploaded to the REC Portal. On the Impact Assessment Page click 'Add Response' to upload the completed document.

Responses can be submitted as:

- **Non-confidential** – the full response plus the submitting organisations name and category will be published; or
- **Confidential** – responses will only be shared with RECCo, the Code Manager, the Responsible Committee and the Authority (where relevant) but will not be published to REC Parties, Service Providers or wider stakeholders. Details of the response will not be referenced in any Change Report; or
- **Anonymous** – the full response will be published, but will omit the name of the submitting organisation (organisation category will be published). Details of the response will be referenced in the Change Report, and the organisation name will be shared with RECCo, the Code Manager, the Responsible Committee and the Authority (where relevant).

Organisations can submit the whole response as non-confidential, confidential or anonymous, or flag each question separately as they wish.

All responses will be treated as non-confidential unless indicated otherwise.

The Code Manager recommends that only financials or other commercially sensitive information is submitted confidentially, and that anonymous is used for all other cases where the submitting organisation does not wish to be identified, as this allows the details of the response to be seen in the Change Report and for the Code Manager's comments to the response to be published.

RESPONDENT'S NAME	David Addison
RESPONDENT'S ORGANISATION	Xoserve
RESPONDENT'S ORGANISATION CATEGORY	Gas Retail Data Agent
RESPONDENT'S EMAIL ADDRESS	David.addison@xoserve.com
RESPONDENT'S TELEPHONE NUMBER	
RESPONSE CONFIDENTIALITY	Non-Confidential

QUESTIONS

1. Do you have any comments on the proposed solution?	
We understand the principle of the change, and in principle agree that there should be timely notifications once an alliance has been established by the originating Code. We do not agree with the proposed solution therefore look forward to working with the REC Code Manager on a revised proposal. We consider that the solution risks dual governance as it seeks to incorporate matters dealt with in the UNC. The Regulatory Alliance between the relevant Transporter and Shipper is established in the UNC, is mastered by the CDSP therefore we believe the extent to which messages can be rejected by CSS are limited. We believe that this change undermines the principles established in the UNC and creates a precedent that we believe is inappropriate and do not believe that SLAs exist for other messages in the REC, where messages from parties responsible for the mastering of data are subjected to validation. I don't think that this level of detail is correct to be applied within the REC Schedules. We do observe that changes have not been considered to the Commercial Alliance. And whilst we do not consider that changes to the Regulatory Alliances are proportionate and required (particularly at the scale proposed), we query consistency as the Commercial Alliances will equally prevent Registration Events if these are not established correctly and in a timely manner. Note: We are reading the definition of a Working Day to mean that once a party becomes aware of a matter that needs to be notified that this notification will be issued by no later than the conclusion of the following Working Day, or is it intended to infer that it must be notified at the same time on the following Working Day. Which is this the correct understanding of the SLA proposed?	
RESPONSE CONFIDENTIALITY	Non-Confidential

2. Do you agree the proposed solution addresses the problem statement? If not, please provide details.

We understand the problem statement to be:

“The lack of Service Level Agreements (SLAs) on Network Parties to submit Regulatory Alliances to the CSS Provider or to work any rejections received from the CSS Provider can lead to delays in Consumers being able to Switch to their chosen Energy Supplier.”

In gas, the relationship with Transporters and with Shipper is dealt with in the UNC, and not the REC. Equally the Supplier / Shipper Commercial Alliance is managed in the UNC.

It is unclear as to the extent that the issue has been caused by a single or multiple party and the extent to which remedial action has been taken if this relates to a single party. It would be useful to understand the extent to which the issue relates to tardy notifications or rejections of these alliance messages. It would be useful to understand the nature of the synchronous validation failures that occurred in these instances to determine the extent that the proposed solution is proportionate.

We believe that this change isn't proposing to change the synchronous validations applied by CSS. Our understanding is that these validations realistically only check structure and that the enumerated values provided are correct. We consider this level of detail in the Code is unnecessary, particularly notification to Shippers of outcomes of synchronous validation assessments.

RESPONSE CONFIDENTIALITY

Non-Confidential

3. Are there any alternate solutions that would better meet the needs of the problem statement?

There is insufficient information to the problem experienced to determine whether this solution is proportionate or reasonable to place obligations on other parties and whether the correct resolution resides in the REC or an alternative Code.

We note that parties should provide this information via defined messages – the extent to which these parties have demonstrated compliance with these might be something that could be checked by the Code Manager as part of qualification and requalification.

RESPONSE CONFIDENTIALITY

Non-Confidential

4. Do you have any comments on the proposed legal text?

We disagree that the new line 4.10.1 resides in the REC. The UNC deals with the management of flows between the Transporters and the CDSP therefore is not relevant to this Code.

We would like to better understand the nature of the synchronous validation that CSS will apply noting that the CDSP is the master of this data therefore the synchronous validations should only be restricted to formatting issues. Given this, we are unconvinced that this level of detail resides in the REC.

We are not convinced that this level of detail is considered elsewhere in the REC regarding synchronous responses. We are concerned with this precedent and would be interested to understand the Code Manager's view on this, and if this is unusual that this level of detail is provided, we would welcome an understanding as to the reason why this approach has been taken here.

We are not convinced that 4.10.7 resides in the REC as notification to Shippers should be considered in the UNC nor do we consider that any rejections originating from CSS could be considered valid from a UNC perspective when it is this Code that masters these relationships.

We note that 4.10.10 doesn't place any obligations where an alliance has ended. And whilst we disagree that this is relevant when it is created it would be useful to understand the inconsistent approach applied to the legal text – i.e. why does the Code Manager consider the level of oversight is necessary on creation, but not ending such alliances. From a REC Party perspective, I would imagine both are as important.

Whilst we disagree with the solution proposed we note that it also does not consider Shipper to Supplier Alliances. Can the Code Manager share reasons why this doesn't apply?

RESPONSE CONFIDENTIALITY

Non-Confidential

5. Do you agree with the Code Manager's decision not to introduce routine Performance Assurance monitoring/reporting for this Issue?

We consider that doing so would be disproportionate. But equally question the proportionality of the proposed solution given that the problem statement appears to reference instances of failure by a single party.

RESPONSE CONFIDENTIALITY

Non-Confidential

6. Do you think we have identified and considered all processes and scenarios that may be impacted through the implementation of the proposed change?

There is insufficient information as to the issue to consider this fully.	
RESPONSE CONFIDENTIALITY	Non-Confidential

7. What lead time would be required for your business to implement the proposed solution? Please provide justification.	
We do not consider that there is sufficient information to fully assess the solution.	
RESPONSE CONFIDENTIALITY	Non-Confidential

8. Are you aware of any constraints on when this change can be delivered?	
We do not consider that there is sufficient information to fully assess the solution.	
RESPONSE CONFIDENTIALITY	Non-Confidential

9. Do you foresee any risks to your qualification or migration plans to be delivered as part of MHHS implementation caused by the delivery of this change?	
N/A.	
RESPONSE CONFIDENTIALITY	Non-Confidential

10. Would implementing the proposed solution incur any costs to your business? If so, please provide details breaking down design/build/test costs and on-going costs. If preferable, please indicate which of the below ranges your costs may fall: A) Nil; B) Up to £9,999; C) Between £10,000 and £49,999; D) Between £50,000 and £99,999; or E) more than £100,000.	

We do not consider that there is sufficient information to fully assess the solution. As noted above, we disagree with certain aspects of the solution which will impact our response to this change with respect to the proposed scope.

RESPONSE CONFIDENTIALITY

Non-Confidential

11. Do you identify any benefits to your business or the energy market through the implementation of the proposed solution?

We do agree that it is important that Regulatory Alliances are reflected promptly in Central Systems for the wider energy markets.

We do not consider that there is sufficient information to fully assess the proportionality of this solution and the business case. As noted above, we disagree with certain aspects of the solution which will impact our response to this change with respect to the proposed scope.

RESPONSE CONFIDENTIALITY

Non-Confidential

12. Taking into consideration both the costs and the benefits seen, do you consider this change should be made?

We consider that there is insufficient information to assess whether the solution proposed is likely to be effective. As noted above, we disagree with certain aspects of the solution which will impact our response to this change with respect to the proposed scope.

RESPONSE CONFIDENTIALITY

Non-Confidential

13. Do you have any other comments relating to this Change Proposal?

As mentioned above, we have concerns about the approach proposed as the solution doesn't recognise the master of the data – e.g. providing a report back (which one reads as a justification) back to CSS in the event that the message is not being resubmitted. We think that this sets a precedent that is inappropriate and is outside of the existing Service Definition response times for a matter impacting an individual User.

RESPONSE CONFIDENTIALITY

Non-Confidential