

Updated – 14 June 2021

Data Capture, Validation and Transfer

- 1. How are Suppliers assured of the accuracy and timeliness of data provided by PCWs? How do we achieve more consistent delivery?**

The Forum has not yet considered data validation or transfer processes.

- 2. What information, in addition to tariff information, is required from Suppliers that PCWs should pass on to consumers during the first interaction?**

There is no additional information from Suppliers that PCWs must pass to consumers.

In all cases, consumers should be told about their right to cancel, who will contact them, and that their switch will take no longer than 5 days (supplier to confirm).

- 3. How can PCWs facilitate the capture of opening reads?**

The Forum has mixed views on the potential benefits of capturing an opening meter reads at the point of sale. The PCWs who expressed a view on this felt that it would interrupt and complicate the website interaction for consumers and that fewer would possibly complete the process if this requirement were added.

It has been noted that there are differences between future gas and electricity opening meter read arrangements and this has been flagged to Ofgem.

In summary, the following position has been endorsed by the Forum.

‘A view has been reached that the current arrangements for the capture of opening meter reads should remain as-is, with collection being the responsibility of the Supplier, unless a Supplier bilaterally agrees otherwise with a PCW.’

- 4. What can be done to ensure that the current meter type is validated and provided to Suppliers?**

The Group has not yet considered data validation. Due to be considered at Working Group meeting 3.

5. How can PCWs capture and pass on consumer specific data, (e.g., priority services register)?

Suppliers and PCWs approach this in a variety of ways currently. Where captured by PCWs (as required by some but not all suppliers), there is support for adopting the standard categorization of needs agreed for gas, electricity and water industries. Approaches will be agreed between parties but, to overcome potential concerns over data privacy, some believe that the primary responsibility for capturing PSR needs should reside with Suppliers. Under this approach, PCWs could signpost that new Suppliers will invite consumers to provide information on any special needs.

Warm Home Discount may be used as a filter by some PCWs (including signatories of the Confidence Code) but a switch can proceed without that question being asked.

In summary, the Forum acknowledges that currently, the Supplier requirements of PCWs to capture this information at the point of sale are variable. The following position has subsequently been endorsed by the Forum.

'Suppliers and PCWs will continue to agree on a bilateral basis, whether and how to capture this information from consumers at the point of sale. Suppliers have a obligation to identify, capture, record and update this information where applicable and there is a general Forum consensus that the consumer experience can be improved and that where questions are asked and information captured at the point of sale, it should ideally be consistent with the standard industry codes that are utilised across gas, electricity and water. Further, there is consensus that a switch can proceed without this information being captured, but Suppliers will need to consider the timing of obtaining information within the context of faster switching timeframes, particularly a next day switch. It has also been acknowledged that some consumers may be cautious about providing personal data to PCWs.'

6. What validation activity do Suppliers require PCWs to carry out?

The Group has not yet considered data validation but the use of the Retail Energy Location (REL) is regarded as an essential new requirement. Compatibility of meter and tariff choice has been flagged as a significant point of failure. Also, related meter points can trigger rejections if unrecorded.

Many parties have suggested that consumption history should be used to improve the accuracy of future cost estimates, however access to industry held information is inconsistent across gas and electricity.

Change of Tenancy is something that some Suppliers believe should be recorded at the point of sale, but is not easily validated or a prerequisite to enable a switch to progress.

7. How will PCWs and Suppliers use industry-available data to give the consumer a smooth sale journey?

Consistent access to and use of industry data that is held centrally by gas and electricity Data Enquiry Services will become more critical in the future.

The Group has not yet discussed this topic.

8. Can PCWs have access to industry data (EES and GES) to validate consumer-provided data?

Some commercial and contractual obstacles have been flagged and will be scrutinised with the relevant parties, as appropriate, in open forum. Engagement with Data Enquiry service providers will be facilitated at a future meeting of the Data Capture, Validation & Transfer Working Group.

9. How can we ensure that the new Retail Energy Location (REL) is consistently used for validation?

All parties continue to have many questions on access to, use of, storage of the REL. PCWs have, to date, been provided with limited information on the REL and what it will mean for them under the new switching arrangements. The DCC facilitated a PCW specific REL information session on 14 June.

Further discussion relating to the validation of the REL will take place at a future meeting of the Data Capture, Validation & Transfer Working Group.

10. What changes need to be made to current data transfer processes to enable the timely provision of information?

The Group has not yet considered data transfer processes but it is noted that the impetus for change is associated with the definition of 'Relevant Date' (updated proposed Supply Licence drafting now published) and real world experiences after implementation. Consideration of Ofgem expectations on switch speed from the point of sale is also required.

11. Can batch file processes be amended to address timing concerns such as lack of processing at weekends? Is batch processing viable in the future?

The Forum has not yet considered data transfer processes. However, it is expected that batch file processes will continue to be utilised by some PCW/Supplier interactions for the foreseeable future and will definitely still be in place at the point that faster & more reliable switching arrangements are introduced in the Summer of 2022.

12. How do we address errors, rejections and erroneous transfer requests in a timely manner?

The Forum has not yet considered process failures in any detail.

13. How can we ensure that there are robust feedback loops in place between Suppliers & PCWs?

There is no evidence so far of any shortcomings in this area and existing feedback loops have been established on a bi-lateral basis. However, the question will be addressed at a future meeting of the Forum.

14. Credit Vetting: What are the timing and treatment considerations associated with a next day switch?

Currently all credit vetting is conducted by Suppliers, though some data items to facilitate this is currently captured at the point of sale.

The following position has been endorsed by the Forum.

'The Forum agrees that there will be no changes required to the existing Data Capture requirements that enable credit vetting to take place.'

15. Does auto-switching drive any additional requirements?

This will be considered at the next meeting of the main Forum on 16 June. Undetected changes of tenancy have been highlighted as creating problems and customer detriment historically.

16. Should the PCW capture Change of Tenancy information at the point of sale?

This data item is regarded as critical by some suppliers. PCWs strive to present a simple process but one indicated that information relating to a Change of Tenancy event should be 'relatively easy' to include. Further data is being sought on industry usage volumes.

17. Will the new switching arrangements and faster switch speeds have any implications to Collective Switching?

Further to Forum discussion, the following position has been endorsed by the Forum and communicated to the switching programme/Ofgem.

'As the topic of Collective Switching is out of scope of the Forum's Terms of Reference, that it is added to the Risk Register and immediately flagged to the switching programme/Ofgem for their awareness and consideration of any required interaction with, or communication to, Collective Switch providers.'

Consumer Communication and Engagement

18. How will PCWs make standstill periods, cool-off periods and changes clear to consumers?

Cool-off Periods - points still to be concluded by the Forum are when the cool-off period starts; current communications are inconsistent. Does the cool-off period start at the point of sale or from a point determined by the Supplier? What is the legal interpretation that should be consistently used by both PCWs and Suppliers?

Further, who has the primary responsibility for delivery of the cool-off information (PCW or gaining Supplier, or both)? Some draft recommendations will be prepared for review at a future meeting proposing a solution that is aligned with the legal interpretation of the relevant legislation.

Standstill Periods – see Question 19.

19. How will a PCW know if there is a standstill period? What action would this trigger?

For further consideration when the Forum discusses data validation, at the next Data Capture, Validation & Transfer Working Group meeting on 25 June.

In principle, subject to validation discussions, there is a general consensus that PCWs will not need to flag or validate Standstill periods at the point of sale.

20. How do PCWs communicate offers and the objection process to consumers?

The current rules on why existing Suppliers may object will continue to be valid under faster switching processes. It will be the responsibility of PCWs to review their current messaging as required.

The objection window parameters will change at go-live. The window for domestic will be 1 working day and the window for non-domestic will be 2 working days.

21. How will PCWs provide information to consumers about timelines for next steps in the switching process?

All PCWs currently provide information to the consumer on 'what happens next'. It will be the responsibility of PCWs to review their current messaging and to update it where necessary, in line with the principles agreed by the Forum.

In accordance with the definition of 'Relevant Date', the Forum has agreed that Suppliers are best placed to determine the Supply Start Date (SSD) and be responsible for communicating this date to the consumer.

The Forum has commenced discussion on timeline messaging and further clarity on this will be provided in due course. The ambition remains for PCWs to be able to provide confident messaging about switching dates for all Suppliers.

22. How will future dated switches agreed with consumers be treated by PCWs and Suppliers?

A balance must be struck between offering customer choice and making the range of options bewildering. There has been Forum discussion on whether a choice of start date be offered to customers. Or should PCWs just be able to capture and pass on this information if it is provided by the customer. Changes to existing arrangements would require PCWs to develop their approach to dealing with varied customer requirements, whilst keeping the process as simple as possible. It was noted that there are scenarios where a delay might be preferable for the consumer (e.g. to sustain a cheaper contract or to align renewal dates to assist in household management).

In summary, the following position has been endorsed by the Forum:

'The Forum agrees that as there are not any material changes to the current obligations, as detailed within the Supply Licence Conditions, no changes to existing arrangements are required unless agreed bilaterally between parties.'

23. What are the implications of automated switching services?

To be discussed at the Main Forum meeting 3 on 16 June.

24. Who will own the relationship with the customer along the process, particularly

when there are problems with the switch request, or the switch fails?

The focus to date has been on the straightforward operation of the process or 'happy path'. A number of 'unhappy path' scenarios will be considered in future discussions.

25. What are the implications of OFAF (One Fail All Fail) switch requests?

To be discussed at the Main Forum meeting 3 on 16 June.

26. How will PCWs be aware of differing Supplier offerings at point of implementation, in terms of differing switch lengths?

It has been acknowledged that whilst the Supply Licence provides clarity on the obligated period of time it should take for a switch to complete (from the 'Relevant Date'). Further, that there is a short-medium term Ofgem aspiration that all Suppliers move towards a next day switch as standard. However, at the point of go-live the switching timeframes being offered by Suppliers will vary dependent upon a number of factors.

This should not be a concern for PCWs as, per the answer to Question 21, the Forum has agreed that Suppliers are best placed to determine the Supply Start Date (SSD) and be responsible for communicating this date to the consumer. With the consideration of how this is messaged to consumers at the point of sale, still to be discussed.

27. How do we ensure that customers are fully informed of process and timing expectations, but not over-promised or misinformed?

It is important that customers are not incorrectly advised or over-promised (potential for complaint, performance monitoring and compensation payment issues). Suppliers will be responsible for their own compliance with Licence obligations and will select the PCW partners that they are confident will be able to comply with those relevant obligations and to engage customers. See Question 21.

28. How do we generally ensure consistent, accurate messaging to consumers?

Some draft recommendations on 'core content' (but not wording) will be reviewed at the next meeting of the Consumer Communication & Engagement Working Group on 1 July.

Policy & Governance considerations

29. How do obligations, consistent across all Suppliers, get applied to PCWs?

Suppliers own their individual compliance with Supply Licence obligations and remain accountable for the performance of the agents with whom they have contractual agreements. No changes are envisaged.

30. What are the implications of cooling-off arrangements that will remain up to 2 weeks following a successful CoS event? When is a switch deemed to be successful?

The switch is initiated (and the 'Relevant Date' is triggered) once all required data has been received by the acquiring Supplier. The switch will be 'successful' when the objection period has passed, and the switch completes against the Supply Start Date provided by the acquiring Supplier.

The implications of the cooling-off period continuing beyond the Supply Start Date are that:

- the old supply contract has ended; in the event of cool off, any replacement by 'Supplier A' may not be identical (but similar);
- it is relatively easy for a consumer to move to a 'Supplier C', indeed this could be progressed by the consumer without formally invoking cool-off;
- there is a need for PCWs to get 'express consent' from consumers to pay for any energy consumption and standing charges incurred whilst with 'Supplier B' during the cool-off period. Suppliers have advised that without consent, the Supply Start Date will be deferred until after the cool-off period ends.

Also refer to Question 18 – there will be further consideration of Cool-offs periods by the Forum.

31. How will PCWs notify Suppliers of the 'clock' start for Suppliers when the switch is initiated through them, recognising that there could be different timings for different journeys?

Refer to Question 21. The 'clock' start will not be determined by the PCW, but will commence from the 'Relevant Date' as defined within the Supply Licence. The

Supplier will be responsible for determining the 'Relevant Date' and the Supply Start Date.

32. When does the 'clock start ticking' on a new switch request and how does this differ to the commencement of the cooling-off period?

Refer to Question 31. The 'clock' start for a switch will commence from the 'Relevant Date' as defined within the Supply Licence.

The Forum will further discuss the formal 'commencement' date of the cooling-off period to ensure that there is a consistent and accurate understanding across both PCWs and Suppliers and that this can be fed into future consumer messaging. Some draft recommendations will be prepared for review at a future Working Group meeting.

33. How can the structure of relationships between suppliers, PCWs and consumers be future-proofed against regulatory initiatives further down the line?

The Forum has not yet considered this question.

34. Will there be a requirement to make changes to the Confidence Code?

The following position has been endorsed by the Forum and communicated to Ofgem.

'Following Forum consideration, it has been concluded that no amendments are required to the existing Code of Confidence arrangements as a result of the introduction of Faster & More Reliable Switching and that this view be communicated to Ofgem for information.'

35. Are there any implications to the Energy Switch Guarantee arrangements?

The following position has been endorsed by the Forum and communicated to the independent Chair of the Energy Switch Guarantee.

'There will be a requirement to amend the wording of the existing Energy Switch Guarantee commitments, as a result of the introduction of Faster & More Reliable Switching. Specifically, Commitment 3 will require amendment to align with revised Supply Licence Conditions. In addition, Commitment 6 will require re-wording to take into consideration revised cooling-off arrangements.'