



PCW/Supplier Forum

Consumer Communication & Engagement Working Group – Meeting 2
3 June 2021

Competition Act Reminder

- In taking part in this meeting, participants are confirming that they have undergone relevant training to raise their awareness of, and ensure compliance with, applicable competition law, including the Competition Act 1998 and Articles 101 and 102 EC and that they will not discuss matters that would or might lead to any breaches of competition law.

Agenda

Item	Topic
1	<i>Introduction</i>
2	<i>Discussion: Minimum Messaging requirements and clarity over responsibilities:</i> <ul style="list-style-type: none">➤ <i>Update on latest 'Relevant Date' definition</i>➤ <i>Areas where communication consistency may be beneficial to the consumer:</i><ul style="list-style-type: none">○ <i>Next steps</i>○ <i>Cooling-off</i>○ <i>Switch speed</i>
3	<i>Consumer Requested Switch dates</i>
4	<i>Consideration of the journey from a Consumer perspective</i>
5	<i>Proposed Work Plan for this Working Group and dates of future meetings</i>
6	<i>Review of Actions Log</i>
7	<i>Updates/additions to the Forum Risk Register</i>
8	<i>AOB</i>

The aims of today's meeting....

- Continued discussion on the topic of the **typical consumer journey, alongside consumer perceptions and expectations.**
- Further to discussions at the first Working Group meeting, continue to discuss and agree where the consistency of consumer communication/messages may be beneficial.
- Agree approach to Customer Requested Switch dates, further to Forum member action from the first Working Group.
- Consideration of the journey from a consumer perspective, including what a customer may reasonably expect to experience.
- Provide oversight of the proposed Working Group approach and confirmation of future meeting dates.
- Review the Working Group Actions Log.
- Review and update the Forum Risk Register as required.
- Finally, consider AOB from Working Group members.

'Relevant Date' – updated legal text

- Ofgem have published the updated, proposed Supply Licence changes for switching. The Forum will utilise this definition as the basis for all future discussions.
- The accompanying explanatory note advises that it represents *'our current view of the text which we intend to use for the statutory consultation on the Switching Programme licence changes. That statutory consultation is due to begin in December 2021.'*
- Further that *'Programme parties and licensees should therefore be mindful that the proposed drafting will be subject to further consultation (i.e. the statutory consultation), so may be subject to further change as a result of responses to that consultation.'*

Definitions for condition 14A.20

"Relevant Date" means:

(a) the day on which a Customer:

- i. has entered into a Contract with a new Gas Supplier and
- ii. has provided the Gas Supplier or its Representative with sufficient information to conduct the switch and
- iii. the Customer would reasonably expect the switch to take place without further action on their part; or

(b) or where a Customer enters into a Contract with a new Gas Supplier on a day that is not a Working Day, or after 5pm on a Working Day, the next Working Day following the day specified in paragraph (a) above.

2. Consumer Communication - Minimum Messaging requirements

- The initial Working Group session reviewed a selection of current PCW and Supplier comms at the point of initial interaction/sale.
- Presentation approaches vary, but also differences on the content of key messages being delivered.
- Absolute requirement to sustain differentiation, whilst seeking to improve consistency of key messages to consumers.
- Important to reduce potential for customer confusion or detriment.

- **There were three information/topic areas identified, that would benefit from a standardised/consistent approach to consumer messaging in the future.**

What information should customers always be given at the point of sale?

1. Next Steps

- *What will happen next*
- *Who will contact you*

2. Speed of switch

- *A firm date?*
- *A probable date?*
- *A 'no later than' date?*
- *A choice of date?*
- *Wording which provides a generic view*

3. Cool-off

- *Yours rights and options*
- *When the period for cool-off starts and ends (consistent & accurate)*

Note: For signatories, everything in the Confidence Code

- *Nothing changes as a result of Faster and More Reliable Switching*

Aiming for accurate & consistent information, delivered in differentiated ways

Issues impacting on Next Steps and Speed of Switch

- Supplier specific approaches to provision of Switch dates
 - *Calculated from the 'Relevant Date'*
 - *Consideration dependent upon happy/unhappy pathway*
 - *Differing approaches to post-cutover offering*
- Agreement to pay for energy if you use cool-off
 - *Non-specific or amended start date offered if no consent is given*
 - *Need for consistently applied definition of when customer cool-off commences*
- Unpaid debt
 - *Warning that your current Supplier might delay or block the switch if there's a debt*
- You changed supplier very recently
 - *You cannot switch Supplier until dd/mm/yy, when the 'standstill' period expires*
 - *Alternatively, process the switch with a later effective date – Supplier driven?*
- **Prepayment**
 - *Can a switch proceed ahead of a new payment device being received?*
 - *What is the time required to issue a new payment device?*
 - *How does information differ for prepayment customers with smart meters?*

Priority Services Register

- This topic has been covered during our Data Capture discussions
- Assumption: The current arrangements are not materially impacted by the introduction of FMRS (Faster & More Reliable Switching)
- Potential opportunity to improve reliability and customer experience?
 - Adopt standard set of industry codes
 - Opportunity to ask **once** at the point of sale with information transferred to the Supplier
 - Meets Supplier obligations
- Observation: Actual journey examples have demonstrated that, on occasion, the consumer is asked for the information twice, (firstly by the PCW and shortly afterwards by the Supplier) - which can be confusing and frustrating.

3. Customer Requested Switch Dates

- Forum members took Action C1-001 from our previous Working Group meeting on 6 May:
 - *Consumer requested switch dates. All Forum members to consider: Should the consumer be offered a choice of switch date at the point of sale? Or, should the process remain consistent with today i.e. no choice at point of sale, with an additional capability for consumer requests to be captured and passed on?*
- No specific comments have been received in response.

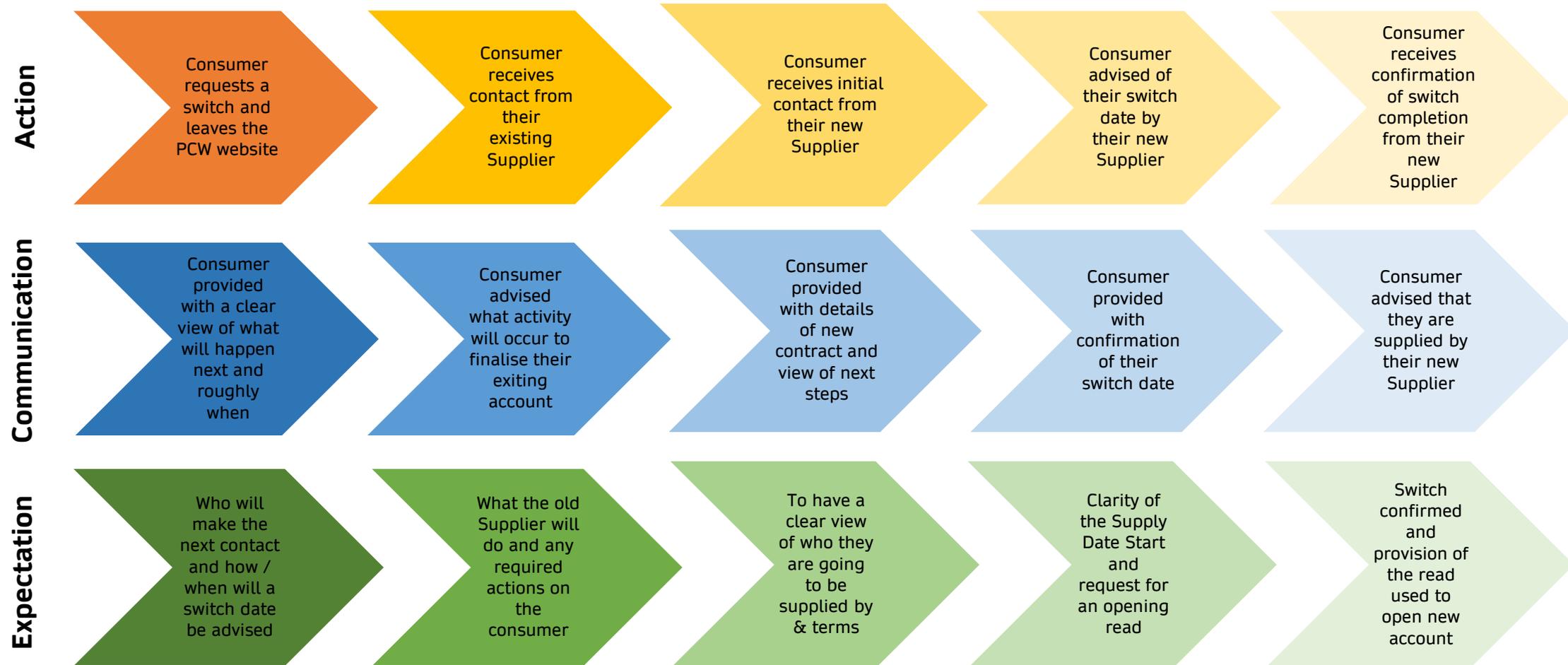
Customer Requested Switch Dates - Proposal

- At the Data Capture, Validation & Transfer Working Group on 27 May this topic was discussed at the following information presented.
- The proposed drafting of SLC 14.A.2 states:
 - *'The licensee must include a term in each Contract that has been entered into with a Customer, providing that the licensee will complete any Supplier Transfer in accordance with that Contract as soon as reasonably practicable and, in any event, within five Working Days of the Relevant Date unless:*
 - a) *the Customer requests that the Supplier Transfer be completed at a later date; or*
 - b) *the Customer notifies the licensee that he does not wish the Supplier Transfer to take place; or*
 - c) *One or more of the conditions in paragraph 14A.3 applies.'*
- The current drafting of SLC 14.A.2 states:
 - *'The licensee must include a term in each Contract that has been entered into with a Customer, on or after the day after the day on which Electricity and Gas (Internal Markets) Regulations 2011 are made, providing that the licensee will complete any Supplier Transfer in accordance with that Contract within 21 days of the Relevant Date unless:*
 - a) *the Customer requests that the Supplier Transfer be completed at a later date; or*
 - b) *the Customer notifies the licensee that he does not wish the Supplier Transfer to take place; or*
 - c) *One or more of the conditions in paragraph 14A.3 applies.'*

Proposal: The Forum agrees that as there are not any material changes to the current obligations, no changes to existing arrangements are required unless agreed bilaterally between parties.

4. Consumer perspective – ‘Happy Path’ consumer journey

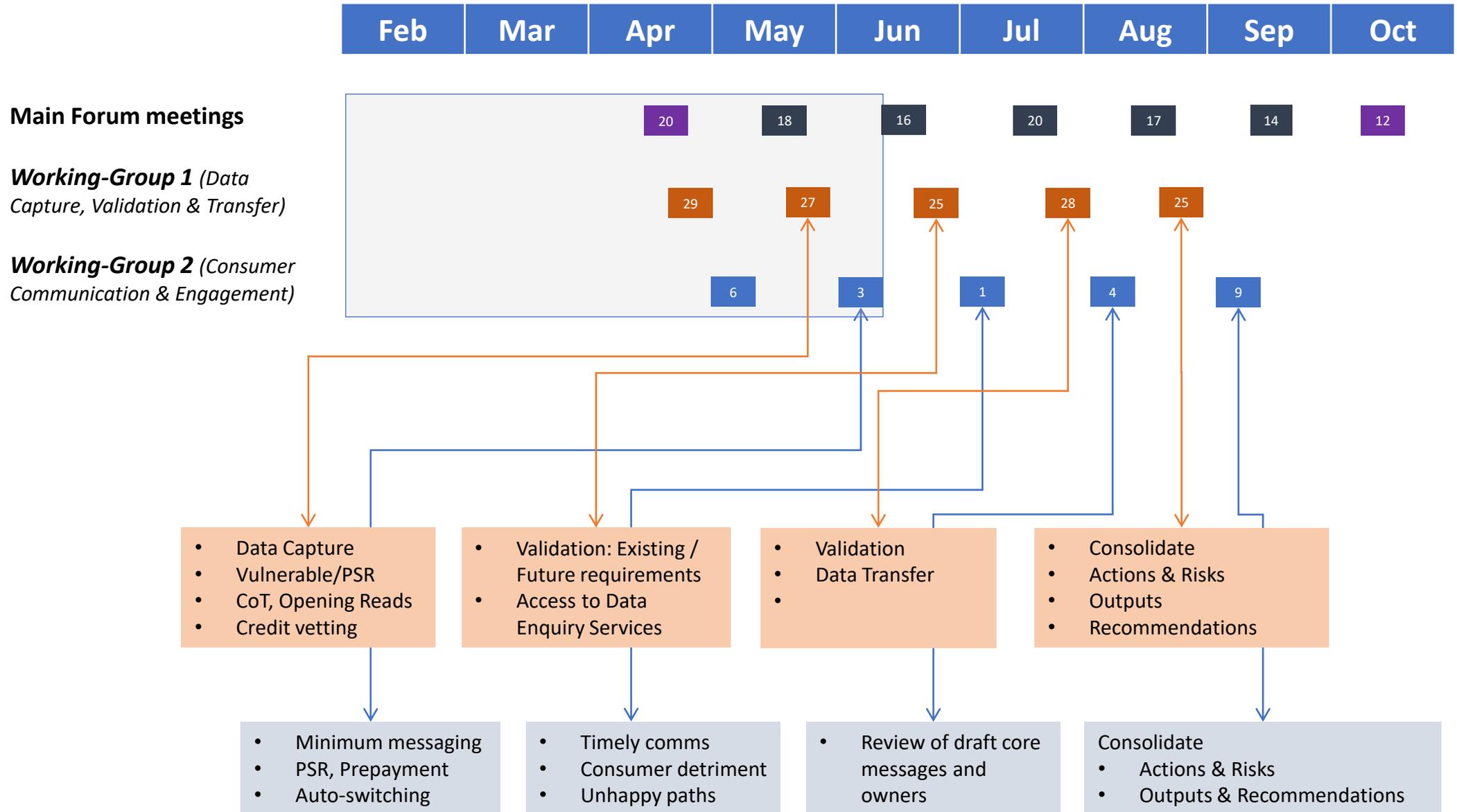
- The Consumer Journey Forum have previously considered the consumer experience during the journey from initial contact to Supply Start Date.
- There is potential for customer confusion/detriment as the timeframe for switch completion dramatically reduces – with multiple contacts by multiple parties within a shortened timeframe. How can this be mitigated?



5. Future meeting dates

Date	Time	Meeting
<i>Thursday 1 July</i>	<i>2pm</i>	<i>Consumer Communication & Engagement Working Group – meeting 3</i>
<i>Wednesday 4 August</i>	<i>2pm</i>	<i>Consumer Communication & Engagement Working Group – meeting 4</i>
<i>Tuesday 30 August</i>	<i>2pm</i>	<i>Consumer Communication & Engagement Working Group – meeting 5</i>

Proposed High-Level approach for future Working Groups



6. Actions Log

Consumer Communication & Engagement Working Group (1)

Actions Log

Version Date: 2 June 2021

Ref	Date raised	Action	Update	Owner	Status
C1-001	6-May-21	Consumer requested switch dates. All Forum members to consider: Should the consumer be offered a choice of switch date at the point of sale? Or, should the process remain consistent with today i.e. no choice at point of sale, with an additional capability for consumer requests to be captured and passed on?	Awaiting responses from Forum members.	Forum members	Ongoing
C1-002	6-May-21	Consumer messaging – Prepayment meters. The Chair to ensure that Prepayment messaging is considered further at a future Working Group meeting.	To be scheduled for discussion at a future Working Group meeting.	Chair	Ongoing
C1-003	6-May-21	Switch Speed Supply Licence obligations. The Chair to circulate the current and future proposed Supply Licence Condition text for information.	Information issued to Forum members by email on 14 May.	Chair	Complete
C1-004	6-May-21	Working Group diary planning. The Chair to issue calendar invites to the Forum contact list for future Consumer Communication & Engagement Working Group meetings.	Calendar invites for future DCVT Working Group meetings have been issued.	Chair	Complete

7. Risk Register

PCW/Supplier Forum Risk Register (Page 1)

Version Date: 27 May 2021

ID	RISK	DESCRIPTION & IMPACT	NEXT STEPS
R001	Testing arrangements	Currently, switching programme end-to-end testing arrangements exclude any PCW involvement, so is therefore missing the initial data capture process. This omission could expose end-to end process shortcomings at go-live.	Consideration needs to be given to if and how PCWs and Suppliers can/should, as required and appropriate, test relevant parts of the end-to-end switching process, outside of formal programme testing arrangements.
R002	Incomplete validation against established industry data sources (DES and ECOES).	For a variety of reasons, the consistent access to and utilisation of industry data, by PCWs, is not universal. There are also challenges associated with obtaining or deriving consumption data. The advent of the Retail Energy Location (REL) and the programme requirement/expectation that this will be utilised when initialising new switch requests, will make future access to DES and ECOES by all parties essential.	There is a requirement to establish, understand and address the obstacles that are currently preventing universal access to industry data sources and how these obstacles can be removed ahead of go-live.
R003	Inconsistency in Supplier data capture requirements (by PCWs)	Suppliers have diverse product offerings, different approaches to capturing information such as vulnerable customer/priority register information and differing risk appetites to process elements such as credit vetting. Lack of a consistent or standardised data capture approach introduces complexity and cost.	Whilst recognising the requirement for differentiation, consider the development of a minimum data set, information that is required to enable a faster switch (both 5 working day and next day switch)
R004	Differing data communication arrangements, between PCWs and Suppliers	The existing arrangements facilitate a diverse range of data communication/provision solutions. Whilst current arrangements are predominantly based upon batch processing solutions, processes are starting to evolve (in a non-standard manner), with the introduction of differing API solutions.	Whilst respecting existing commercial arrangements between PCWs and Suppliers and being cognisant of strategic reform that might take occur under the auspices of the Energy White Paper, consider any changes that might be required to better facilitate the implementation of faster switching arrangements in Summer 2022 and consider what an ideal, future target operating model will need to look like to enable next day switching as standard.

PCW/Supplier Forum Risks Register (Page 2)

Version Date: 27 May 2021

ID	RISK	DESCRIPTION & IMPACT	NEXT STEPS
R005	Switch status updates and feedback mechanisms between PCWs and Suppliers	There is a lack of consistent, robust feedback mechanisms that prevent the efficient and timely flow of information between PCWs and Suppliers during the switch process. All parties in the change of supply chain are therefore not always aware of the switch status, particularly problematic where there are process delays and a lack of certainty over which party the consumer might make contact with to investigate/complain.	Consider what improvements could be made to the existing arrangements to mitigate any process issues or consumer detriment.
R006	Industry metering data triggers unnecessary rejections or tariff errors	Many Suppliers treat legacy two-rate rate meters as single rate for billing. Problems can occur where this is not transparent to PCWs.	Further consideration required to establish the extent of this risk and what actions could be undertaken to mitigate.
R007	Potential for customer confusion as the timeframe for switch completion dramatically reduces	The overlap of standstill, cool-off and speed of switch has the potential to confuse customers, particularly if multiple communications are being received from multiple sources (PCW, Old Supplier, New Supplier) within a short period of time. Additional confusion as to who 'owns' the customer at which point of the process, particularly an issue where there is a rejection or blockage in the switch process.	To be considered and addressed by the Customer Communication & Engagement Working Group.
R008	Absolute clarity required of 'relevant date' (when the switch clocks starts ticking)	All switch processes, requirements and obligations will rest on the clear definition of 'relevant date'. This is particularly important when trying to manage customer communications and expectations, measuring overall switch timeframes & performance and enabling compliance with legislation and guaranteed standards.	Ofgem are currently in the process of providing clarity within revised licence drafting.

PCW/Supplier Forum Risks Register (Page 3)

Version Date: 27 May 2021

ID	RISK	DESCRIPTION & IMPACT	NEXT STEPS
R009	Change of Tenancy events and Auto-Switching arrangements.	Change of Tenancy (CoT) events can cause particular problems with auto-switching, including the creation of erroneous transfers and customer inconvenience/detriment.	Further Forum discussion required to consider what improvements could be made to mitigate customer detriment.
R010	Data Enquiry Services – future resilience and availability improvements.	It will be critical for Data Enquiry Services to have high levels of resilience and availability as the industry moves to faster switching timeframes.	Requirement to engage with Data Enquiry Service providers to discuss and consider any actions necessary.
R011	Retail Energy Location – limited PCW engagement/education of REL requirements and impacts	To date PCWs have had minimal information provided to them about the introduction of the Retail Energy Location and there is currently nothing in place to enable formal engagement with DCC/Ofgem on this topic.	The Chair has taken an action to speak with DCC/Ofgem and seek the provision of REL information session for PCWs.

8. AOB

Appendices

Terms of Reference (para 4.4)

- *4.4 To consider matters associated with Consumer Communication & Engagement, including:*
 - *4.4.1 Consideration of a typical consumer journey, consumer perceptions & expectations and the impacts associated with transition to a five working day and a next day switch;*
 - *4.4.2 Minimum messaging requirements and clarity over responsibilities in all predictable consumer journeys. To include consistency of communication on rights and obligations and what the consumer can expect to happen next and when;*
 - *4.3.3 Approach to ensuring the delivery of consistent, timely consumer communications, a positive experience and the avoidance of consumer detriment, with consideration from a consumer perspective;*
 - *4.3.4 The treatment of consumer-requested Supply Start Dates and any other tailored switching requests.*

Questions for Working Group consideration



Consumer Communication & Engagement

- How will PCWs make standstill periods, cool off periods and changes clear to consumers?
- How will a PCW know if there is a standstill period? What action would this trigger?
- How do PCWs communicate offers and the objection process to consumers?
- How will PCWs provide information to consumers about timelines for next steps in the switching process?
- How will future dated switches agreed with consumers be treated by PCWs and Suppliers?
- What are the implications of automated switching services?
- Who will own the relationship with the customer along the process, particularly when there are problems with the switch request, or the switch fails?
- What are the implications of OFAF (One Fail All Fail) switch requests?
- How will PCWs be aware of differing Supplier offerings at point of implementation, in terms of differing switch lengths?
- How do we ensure that customers are fully informed of process and timing expectations, but not over-promised or mis-informed?
- How do we generally ensure consistent, accurate messaging to consumers?

PCW/Supplier Forum Work Plan v1.0

