Meeting notes & actions.

Discussion points.

Review of Actions Log

- Refer to slides 4 & 5 of the CJF17 slide pack.
- An update was provided by DCC on the following risks:
  - Risk 012, Risk 024, Risk 016 & Risk 021
- A written update in response to the actions taken has been provided by the DCC below (in blue):

- **Risk 012** - There is a risk that the CSS processing takes too long to permit the processing of switch requests (SR) that are dependent upon Registration Date validation (e.g. SR6.23) at various stages in the journey. After the meeting it was confirmed that 'a Service Request (SR)6.23 is sent to the comms hub/Smart meter (SMETS2) when a Supplier gains a customer. It applies the Supplier's certificates to the meter, which allows the Supplier (and only that Supplier) to communicate with the meter.' For Electricity this is normally sent after midnight and for Gas after 5am. If it is sent before this, it will be rejected by DCC as the new Supplier will not be registered as the assigned supplier. **Is this a risk we have considered or mitigated against?**

  This has been considered in Non-functional testing. The DSP/TCOS or DSP/ECOS processing will allow future dated SRV6.23 requests to be sent to the meter for execution on the meter at the supply start time "if" a SecuredActive message has been received from the CSS following Gate Closure. If a SecuredActive message has not been received before midnight (typically by 11pm), the future dated request will be cancelled by the DSP with the Smart Meter User being notified that the request could not be executed. The User can then issue an On-Demand SRV6.23 any time after the supply start time (i.e. midnight for both gas and electric) and as long as the DSP/TCOS or ECOS has received a SecuredActive message in which case the request will be processed. Note: The CSS will keep retrying to send the SecuredActive messages until 12 hours after Gate Closure. In addition, both the DSP and ECOS are expected to request a resend of the messages from CSS if they don't receive an expect message a few hours after Gate Closure. It is expected they will try for around 24 hours to get the messages.

- **Risk 024** - There is a potential risk associated with outages and traffic management by the DCC. **Is this a risk we have considered or mitigated against?**

  We have simulated a failover of Azure which handles the CSS aspect, we are not in control of the rest of the traffic in the industry. Azure Return To Operations (RTO)

target is one hour, the DSP is four hours, ECOS is unknown, but won't be longer than four hours. CSS will deliver the Peak-of-Peak messages within 35 minutes, so even in a DCC DR situation there is time to process the Gate Closure messages, plus we also have the retry mechanism above. Other Industry outages should not impact switches taking place.

- **Risk 016** - There is a risk on disputed/missing reads that need to be completed within a set window [70 days] within which there may be multiple switches. **Is this a risk we have considered or mitigated against?**

  We believe that this risk exists today and is unaffected by CSS as it occurs in a period of time after a switch has taken place.

- **Risk 021** – There is a risk that Suppliers will not be able to meet their obligations for opening meter reads on legacy (dumb) meters in a shorter timeframe. **Is this a risk we have considered or mitigated against?**

  The opening meter reads are in respect of the reading on the day of switch. The introduction of CSS will allow us to get to the day of switch sooner and the time taken to get the meter reading after the day of switch will be the same. This is however a matter for suppliers to resolve between them and does not impact the switch itself.

  A Forum member noted that there would be a need to change the industry process for opening reads if the standstill period was to change (be reduced) in the future.

- **What is the latest position with the start of the Gas Day?**

  Datetime fields are UTC in Smart Metering and Gas will be aligned with Electric. This means a losing Supplier (Gas or Electric) can request a meter read to get the readings up to midnight before the switch, while the gaining Supplier can request a meter read from 00:00 following the switch. I suspect they can issue the requests in local time (so 11pm during BST), but the actual values in the Service Request will still be 00:00 UTC.

- A further action was taken by the DCC further to discussions at CJF16.
- *Action: DCC to confirm whether there is any destruction testing scheduled associated with overlapping, multiple switches in end-to-end testing?*

Topic for discussion – Debt Hopping

- Consideration of Risks 4 & 10 from the Risk Register.
- It was noted that whilst it will be possible for consumers to switch more quickly, it is not known whether this will mean that consumers will switch more often. View expressed that consumers are generally inherently cautious.
- It is difficult to quantify the volume/risk associated with serial switching and debt hopping.
- Acknowledged that it was harder for Suppliers to follow-up and recover small energy charge amounts/debts.
- It was noted that there is a potential for some level of central monitoring to be undertaken, of short term supply periods / multiple switches to assess volume/risk.
- Noted that any outstanding charges can only be treated as a debt after 28 days.
- Any consumers who make the conscious decision to be serial switches and to debt-hop could be deemed as a new category of focus for Revenue Protection activities and industry theft of energy activity.
- *Action: **The Chair to engage with the REC Performance Assurance Code Manager to ascertain whether anything has been proposed around monitoring switch frequency and short supply periods.***
- *Action: **The Chair to engage with REC Revenue Protection leads to flag the potential for 'legal' avoidance of paying energy charges in the future.***

Topic for discussion – Prepayment

- Consideration of Risks 7, 13, 17 & 20 from the Risk Register.
- It was noted that Suppliers are being encouraged to offer emergency credit and/or additional support credit. The requirements reside under Supply Licence Condition 27A Self Disconnection. As a result Risk 17 could become more significant with the introduction of faster switching.
- When considered against faster, multiple switch scenarios, a five day standstill period and the 28 debt rule, there is a concern that these arrangements could potentially be misused by consumers.
- *Action: **The Chair to engage with Ofgem about Supplier concerns on the above and the requirement for appropriate monitoring.***

- There are ongoing Supplier concerns relating to the ability to provide consumers with new prepay top-up devices in a timely manner under faster switching timescales.
- Compared to today's arrangements, there are logistical and cost challenges associated with delivering these within five working days, which in practice is less than this when considering the need to wait for the expiry of the objection window before issue.

- There is a concern that there could be an increase in the volume of misdirected payments associated with the above.
- Suppliers are advised to raise any individual concerns relating to any aforementioned device delivery challenges to Ofgem. Though the Chair will raise this with Ofgem as an observational concern that has been raised by some Suppliers.
- *Action: **The Chair to raise as a general observation/concern with Ofgem.***

- Risk 20 – relating to Debt Assignment Protocol (DAP). Following some discussion it was agreed that this was a topic that required a deep-dive and associated preparation.
- *Action: **The Chair to schedule DAP for discussion at a future CJF session.***

PCW/Supplier Forum update

- An update was provided to the CJF on the latest progress of the PCW/Supplier Forum and future work plan.

Risk Register

- There were no new Risks raised for inclusion on the register.

AOB

- There was a question raised around issues with security credentials in the ECOES architecture. Is there anything being done in the programme with regards to this?
- *Action: **DCC to provide a response to the above.***

- The next meeting (CJF18) is scheduled for Wednesday 22 September.