



Consumer Journey Forum

CJF18 – 22 September 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.

Consumer Journey Forum (CJF18) - Wednesday 22 September 2021 @ 2.30pm

Agenda

Item	Topic
1	<i>Introduction & meeting aims</i>
2	<i>Review of Actions Log</i>
3	<i>Topic for discussion: Smart Metering</i>
4	<i>Topic for discussion: Transition / Cutover</i>
5	<i>Topic for discussion: Communication</i>
6	<i>Topic for discussion: Vulnerability / PSR</i>
7	<i>PCW/Supplier Forum update</i>
8	<i>Risk Register</i>
9	<i>Diary Planning</i>
10	<i>AOB</i>

1. Introduction & meeting aims

- *Review progress on actions from CJF17 on 18 August*
- *Consider the topic of Smart Metering – risks 14 & 25*
- *Consider the topic of Transition / Cutover – risk 23*
- *Consider the topic of Communication – risk 1*
- *Consider the topic of Vulnerability / PSR – risk 19*
- *Receive an update from the PCW/Supplier Forum activity*
- *Consider the risk register and any new risks for inclusion*
- *Consider any AOB items*

2. Review of Actions Log

- Consideration of outstanding actions

Consumer Journey Forum

Actions Log (1)

Version Date: 21 September 2021

Ref	Date raised	Action	Update	Owner	Status
C1-001	27-May-21	Risk Log. Do Forum members have any additional thoughts or comments on the next steps associated with any of the Risks detailed within the Risk Log?	Awaiting response. 21/6 – comments received, discussed at CJF15 on 27 May.	Forum members	Complete
C1-002	27-May-21	Future CJF topics. What topics would Forum members like to discuss at future CJF sessions?	Awaiting response. 21/6 – comments received, discussed at CJF15 on 27 May.	Forum members	Complete
C1-003	27-May-21	Future CJF topics. Chair to engage with Citizens Advice and the Energy Ombudsman to discuss any consumer related issues or topics that should be considered by the CJF.	Chair to progress. 21/6 – agreement with Citizens Advice and the Energy Ombudsman to present at CJF17 on 21 July.	Chair	Complete
C1-004	27-May-21	PPMIPs. DCC to identify if there have been any switching programme related PPMIP engagement?	DCC to progress. 21/6 – DCC confirmed that there has been no programme engagement with PPMIPs. To be further considered when the topic of Prepayment is discussed.	DCC	Complete
C1-005	27-May-21	Risk 5 Closure – Objections. Chair to flag this risk to the REC Performance Assurance Board, specifically in relation to the identification of any misuse of the Change of Tenancy indicator.	The Chair to progress. 2/7 – Risk 5 has been closed – concerns have been flagged to the Chair of the existing ET PAB in the absence of any firm arrangements for the enduring REC PAB.	Chair	Complete
C1-006	27-May-21	Risk 8 Closure – Erroneous Transfers. Chair to flag this risk to both the Post-Implementation Working Group and the REC Performance Assurance for their consideration.	The Chair to progress. 2/7 – Risk 8 has been closed - concerns have been flagged to the Chair of the existing ET PAB in the absence of any firm arrangements for the enduring REC PAB.	Chair	Complete
C1-007	27-May-21	Risk 22 – Design Clarity. Forum members to advise the Chair on any specific areas of concern relating to outstanding E2E design clarity.	Awaiting response. 21/6 – comments received, discussed at CJF15 on 27 May.	Forum members	Complete
C1-008	22-Jun-21	Future meetings. The Chair to issue revised invites for next three CJF sessions with an increased meeting duration of 3 hours.	23/6 – revise invites issued.	Chair	Complete
C1-009	22-Jun-21	Warm Homes Discount. The Chair to ensure that the topic of WHD is discussed further by the CJF at a future meeting.	The Chair to progress. 28/7 – topic scheduled for consideration at the October CJF session.	Chair	Complete
C1-010	22-Jun-21	Regulation Risk 6. The Chair to consider how the risk associated with the overlaps associated with multiple switch events can potentially be depicted in diagrammatical form	2/7 – a diagram was circulated for review and comment.	Chair	Complete

Consumer Journey Forum

Actions Log (2)

Version Date: 21 September 2021

Ref	Date raised	Action	Update	Owner	Status
C1-011	22-Jun-21	Closure of Regulation Risk 9. The Chair to close this risk an write to Ofgem seeking views on any indicative view they currently have on process timeline for any change to the Standstill Period parameter/review post go-live.	3/7 - the Chair wrote to Ofgem seek their views.	Chair	Complete
C1-012	22-Jun-21	Regulation Risk 22. The Chair to discuss concerns relating to ECOS architecture with Norma Wood & Keith Foster and consider next steps.	The Chair to progress.	Chair	Complete
C1-013	22-Jun-21	Billing Windows. The Chair to ensure that this topic is added to a future agenda for CJF discussion.	The Chair to progress. 28/7 – topic scheduled for consideration at the October CJF session.	Chair	Complete
C1-014	22-Jun-21	Recording of future sessions. The look to investigate future recording and consider issues such as GDPR.	The Chair to progress.	Chair	Complete
C1-015	21-Jul-21	Vulnerability/ PSR (Risk 18). The Chair to close this risk on the risk register.	The Risk Register was updated on 28 July 2021.	Chair	Complete
C1-016	21-Jul-21	Vulnerability/PSR (Risk 19) – engagement challenges with vulnerable customers. The Chair to ensure further discussion on this risk when the Forum considers the topic of ‘Communication’ and Unhappy Path consumer journeys.	The Chair to progress. 28/7 – topic scheduled for consideration at the September CJF session.	Chair	Complete
C1-017	21-Jul-21	Switch Processing (Risk 12). Keith Foster (DCC) to take this risk back to the programme for comment.	Update provided by DCC at CJF17 on 18 August.	DCC	Complete
C1-018	21-Jul-21	Switch Processing (Risk 15). The Chair to close this risk on the risk register.	The Risk Register was updated on 28 July 2021.	Chair	Complete
C1-019	21-Jul-21	Switch Processing (Standstill Period). The Chair to confirm latest feedback from Ofgem on approach to considering any reduction to the Standstill Period post implementation.	Post meeting note included with the CJF16 meeting notes, published on 28 July 2021.	Chair	Complete
C1-020	21-Jul-21	Switch Processing (Risk 24). Keith Foster (DCC) to take this risk back to the programme for comment and also a question raised about the start of the ‘Gas Day’.	Update provided by DCC at CJF17 on 18 August.	DCC	Complete
C1-021	21-Jul-21	Opening Meter Reads (Risks 16 & 21). Keith Foster (DCC) to take these risks back to the programme for comment.	Update provided by DCC at CJF17 on 18 August.	DCC	Complete

Consumer Journey Forum

Actions Log (3)

Version Date: 21 September 2021

Ref	Date raised	Action	Update	Owner	Status
C1-022	18-Aug-21	Testing. DCC to confirm whether there is any destruction testing scheduled associated with overlapping, multiple switches in end-to-end testing?	Keith Foster (DCC) to progress.	DCC	Ongoing
C1-023	18-Aug-21	Debt Hopping. 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.	There is currently nothing in place to specifically monitor ongoing short supply periods at MPxN level, though it has been noted as a concern. This will also be flagged to Ofgem.	Chair	Complete
C1-024	18-Aug-21	Debt Hopping. The Chair to engage with REC Revenue Protection leads to flag the potential for 'legal' avoidance of paying energy charges in the future.	This has been raised for future consideration, considered to be subjective at this time until.	Chair	Complete
C1-025	18-Aug-21	Prepayment – Self Disconnection. The Chair to engage with Ofgem about Supplier concerns on this topic and requirement for appropriate monitoring.	This has been raised with Ofgem – awaiting response.	Chair	Ongoing
C1-026	18-Aug-21	Prepayment – device provision. The Chair to raise as a general observation/concern with Ofgem.	This has been raised with Ofgem – awaiting response.	Chair	Ongoing
C1-027	18-Aug-21	Debt Assignment Protocol. The Chair to schedule DAP for discussion at a future CJF session.	Topic to be add to the October CJF agenda.	Chair	Complete
C1-028	18-Aug-21	ECOES Security credentials. DCC to provide a response to the question raised.	Keith Foster (DCC) to progress.	DCC	Ongoing

3. Topic for discussion – Smart Metering

- Consideration of the associated risks from the Risk Register
- Any other Smart Metering related observations

Smart Metering

- Consideration of related Risks 14 & 25 from the Risk Register

Risk 14 – There is a risk that the new Supplier may not be able to reinstate the terms of the previous supplier during a Pre-payment meter switch with a SMETS1 Smart Meter.

- *This could result in a poor consumer experience where the consumer believed they had a Smart Meter and existing terms would be maintained.*

Risk 25 – There is a requirement to engage with SECAS about the change to DNO credentials.

- *Concern about changing credentials and possible implications to information used in gas emergencies.*

4. Topic for discussion – Transition / Cutover

- Consideration of the associated risks from the Risk Register
- Any other Transition / Cutover related observations

Transition / Cutover

- Consideration of related Risk 23 from the Risk Register

Risk 23 – There is a risk associated with the consumer experience around cutover to the new arrangements.

- *This could result in problems or confusion with the consumer switching experience during a short period of time both before and after the Go-Live date.*

5. Topic for discussion – Communication

- Consideration of the associated risks from the Risk Register
- Any other Communication related observations

Communication

- Consideration of related Risk 1 from the Risk Register

Risk 1 – There is a risk that communications to consumers are not clear and all necessary information is not provided to them.

This could result in:

- *a poor consumer journey which could have financial implications for Suppliers in complaints handling/consumer contacts that were not foreseen as part of the delivery of the Programme;*
- *dissatisfied consumers and unwanted switches occurring which could lead to additional Supplier costs in consumer contacts that were not foreseen as part of the delivery of the Programme;*
- *consumers not understanding why switches have been unsuccessful; the perception of switching as a hassle.*

6. Topic for discussion – Vulnerability / PSR

- Consideration of the associated risks from the Risk Register
- Any other Vulnerability / PSR related observations

Vulnerability / PSR

- Consideration of related Risk 19 from the Risk Register

Risk 19 – There is a risk that engagement challenges with vulnerable customers increase due to the perception of increased barriers.

- *Communications are misunderstood or not acted on sufficiently early.*
- At CJF16 it was noted that ‘we’ need to remember that faster switching needs to be at the pace the consumer wants, for example to meet the needs of the non-tech savvy or customers who may be digitally excluded.
- There will be an impact for some consumers due to the increased speed of the process and communication.

7. PCW/Supplier Forum update

- The activity of the Forum is nearing its conclusion, with the two Working Groups having completed their respective deliverables.
- The Work Plan has two further Main Forum meetings scheduled for 30 September and 21 October.
- A number of artefacts have been developed to date, everything will be pulled together in a final report which will acknowledge any outstanding issues & actions and recommendations.
- Agreed Forum positions on myriad topics have been recorded and provided to Ofgem for their review and comment.
- One of the artefacts relates to Consumer Messaging Principles, where consistency and accuracy of message is important.

Consumer Messaging Principles at point of sale

1. Next Steps

- *What will happen next & who will make contact with you*



• *Your new Supplier will be in contact with you shortly to confirm your switch and provide you with a welcome pack/letter, which will include the full Terms & Conditions.*

2. Speed of switch*

- *Indication of how long the switch process might take, without providing commitment to a Supply Start Date (as this will be provided by the Supplier)*



• *Your new Supplier will advise you of your switch date, this is normally no later than five working days from the point they have all the information required to progress your switch.*

3. Cooling-off

- *Provision of information that is aligned with the legal definition and easy for the consumer to understand*



• *You have the right to change your mind, information provided by your new Supplier will detail what your statutory cooling-off rights are.*

4. Unpaid debt

- *Advising that the old Supplier could delay the switch if there is an outstanding debt (unless it is a prepayment debt that can be transferred as part of the process)*



• *Should you have any outstanding charges with your current Supplier, this may impact the progress of your switch.*

5. Provision of an opening meter reading

- *Advising the consumer that they will probably need to send a meter reading to their new supplier to get an accurate closing bill (or credit)*



• *Your new Supplier may require you to take a meter reading on, or close to, the day of your switch.*

6. Collection of vulnerability / PSR information

- *Asking the consumer whether they have any special needs or requirements*



• *Any information provided will be passed onto your new Supplier, who may subsequently require further information from you.*

* Switch speed messaging is subject to bi-lateral agreement between PCWs and Suppliers (there is a potential for more confident messaging on switch date). The Supply Start Date may also be impacted should a consumer choose not to Consent to pay for energy charges during the cooling-off period.

Consumer Journey perspective



Customer expectations



PCW



New Supplier



Old Supplier

Point of Sale: Day 0

I want a simple process and a good deal

Here are the deals available to you

Process: 0 to 4 days from Point of Sale

I've chosen. Tell me what happens next

When will I switch? What are the Ts and Cs?

Tell me if I have to do anything else

Supply Start: 1 to 5 days from Point of Sale

Please confirm when it's all done

Within 42 days of switch

- Your switch should normally complete within 5 working days
- Your new Supplier will make contact and advise you of your switch date
- You will need to settle any debt that you owe your current supplier
- When you've switched you can still change your mind. Your Supplier will provide the details of your rights and options.
- You are agreeing to pay for any consumption and standing charges if you change your mind.

Do you have any special needs?

- Please tick those that apply to you; OR
- *Your new Supplier will ask for details

*Please tell us if you have any special needs

Please send us your meter readings (if no smart reads available)

Welcome. Your supply will start on DD/MM/YY. Here are your Ts and Cs. You can change your mind for 14 days.

You're on supply with us. This is how and when you pay

Prepayment: Here are the details of how to top up your meter and where you can do it. We'll send you a new payment card/device.

Prepayment: Here is your new payment card/device. Please use it from DD/MM/YY and return/destroy your old one

We're sorry you're leaving. Potential 'save' messaging

Prepayment: Please return / destroy your payment device when your supplier has sent you a new one and told you to start using it.

Here is your final bill / refund

8. Risk Register

- Latest version for information.
- Consider any new risks for inclusion.

ID	RISKS	IMPACT	NEXT STEPS	Status
1	<p>There is a risk that communications to consumers are not clear and all necessary information is not provided to them.</p> <p>TOPIC: Communication</p>	<p>This could result in:</p> <ul style="list-style-type: none"> a poor consumer journey which could have financial implications for Suppliers in complaints handling/consumer contacts that were not foreseen as part of the delivery of the Programme; dissatisfied consumers and unwanted switches occurring which could lead to additional Supplier costs in consumer contacts that were not foreseen as part of the delivery of the Programme; consumers not understanding why switches have been unsuccessful; the perception of switching as a hassle. 	<ul style="list-style-type: none"> The PCW/Supplier Forum is considering Consumer Communication & Engagement as part of its activities. 27/5: Forum consensus that whilst the PCW/Supplier is considering consumer communication associated with the PCW journey, there are more generic communication and engagement topics that should be considered by the CJF. 22/6: The topic of Communication will be discussed at CJF18 on 22 September. 	Ongoing
2	<p>There is a significant risk associated with the lack of formal programme engagement with PCWs.</p>	<p>PCWs are involved in the critical, initial consumer touch-point for circa 65% of all switch events. The lack of formal engagement with PCWs creates a missed opportunity for ensuring a robust and efficient consumer experience, the requirement to ensure appropriate validation of consumer/industry data and accurate & consistent consumer communication. Essential to co-ordinate interactions between the PCW/Supplier(s)/Consumer in a next day switch world.</p>	<ul style="list-style-type: none"> Greater engagement with PCWs is required to mitigate this risk. The formation of a PCW/Supplier Forum would enable detailed cross-party consideration. COMPLETE: 27/5 - The PCW/Supplier Forum has been formed and is actively considering a range of topics and process issues associated with PCWs, alongside ensuring their greater, more general engagement with the programme. 	CLOSED
3	<p>There is a risk that Suppliers would not be able to complete the billing process in time.</p>	<p>This could result in a financial impact on both 'losing' Suppliers (lost revenue) and consumers (cash management).</p>	<ul style="list-style-type: none"> Further consideration required by Suppliers and the programme to ensure that processes enable parties to meet their licence obligations with respect to billing. COMPLETE: 27/5 - The consensus of the CJF is that this risk is the responsibility of individual Suppliers to resolve and ensure ongoing compliance with billing related requirements and obligations. 	CLOSED
4	<p>Debt-hopping is a risk with the new arrangements, and needs to be identified as an issue in operation.</p> <p>TOPIC: Debt-Hopping</p>	<p>This would be likely to result in increased costs for debt (either to recover or write off debt), increasing costs for all. We could see increased exit fees or additional risk mitigation measures by Suppliers.</p>	<ul style="list-style-type: none"> Further consideration is required to better understand the negative financial impacts to Suppliers and any potential mitigations. 27/5: Forum consensus that there is no evidence that the switching programme is addressing concerns associated with the potential for Debt-Hopping and further consideration by the CJF is required. COMPLETE: 20/8 - The topic of Debt-Hopping was discussed at CJF17 on 18 August. Whilst it will be possible for consumers to switch more quickly, it is not known whether this will mean that they will. Concerns associated with debt-hopping and potential for monitoring has been raised with RECCo and Ofgem. 	CLOSED

Consumer Journey Forum - Risk Register

20 August 2021

ID	RISKS	IMPACT	NEXT STEPS	Status
5	<p>There is a risk that losing Suppliers cannot complete the objection processes in time.</p> <p>Raise with an alternative industry group</p>	<p>This could result in a financial impact on 'losing' Suppliers that are unable to prevent consumers with large debts switching.</p>	<ul style="list-style-type: none"> Further consideration is required to better understand the negative financial impacts to Suppliers and any process solutions. 27/5: Forum acknowledged that the risk associated with completing objections in time is a current activity for Suppliers to manage. Consensus to flag this risk to the REC PAB, with regards to the identification of any misuse of the Change of Tenancy flag. COMPLETE: 2/7 – Concerns have been flagged to the Chair of existing ET PAB in the absence of any firm arrangements for the enduring REC PAB. 	CLOSED
6	<p>Multiple Change of Supply events, interaction with standstill, cooling off, overlaid with legacy meters can cause huge complexities with the processes and different read windows.</p> <p>TOPIC: Regulation</p>	<p>This could result in increased costs from inaccurate readings/billing.</p>	<ul style="list-style-type: none"> Further consideration is required assess the potential complexities, impacts and any mitigations. 27/5: Forum consensus that further consideration is required on the impacts of the revised/new regulatory requirements once final legal text has been published. 22/6: Ongoing concern about the overlap of multiple switch events. A diagram depicting the potential overlaps has been circulated for review by CJF members. 	Ongoing
7	<p>There is a risk of misdirected payments if a Pre-payment device consumer invokes cooling off, the risk increasing if this is post a confirmed switch.</p> <p>TOPIC: Prepayment</p>	<p>This could result in a poor consumer experience and exception processes being required.</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed via an appropriate industry pre-payment expert group to assess potential impacts and any mitigations. The topic of Prepayment was discussed at CJF17 on 18 August. 20/8: The Chair has written to Ofgem expressing Supplier concerns (Action C1-025). 	Ongoing
8	<p>There is a risk that Erroneous Transfers may increase as a result of complex industry data processing (Xoserve, ECOES, third parties such as PCWs).</p> <p>Raise with an alternative industry group</p>	<p>This could result in higher costs as, from 01 May 2020, Suppliers must pay the customer an auto payment of £30 when an Erroneous Transfer has been identified. Data quality issues to be mitigated to an extent by data cleansing.</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed via an appropriate industry Erroneous Transfers expert group to assess potential impacts and any mitigations. 27/5: Forum consensus that this risk should be flagged to both the Post Implementation Working Group and the REC Performance Assurance Board for consideration. COMPLETE: 2/7 – Concerns have been flagged to the Chair of existing ET PAB in the absence of any firm arrangements for the enduring REC PAB. 	CLOSED

ID	RISKS	IMPACT	NEXT STEPS	Status
9	<p>There is a risk that if the Standstill period is set to zero for Go Live, consumer behaviour may change and industry may not be able to manage serial switchers appropriately.</p> <p>TOPIC: Regulation</p>	<p>This could result in a greater number of serial switchers and the opportunity for incremental small debt to build up.</p> <p>This could also result in potential settlement implications with such an uncertain customer base, which may be a particular risk with Third Party Intermediaries or auto switching sites.</p>	<ul style="list-style-type: none"> The potential impacts of a low-value Standstill Period requires further consideration, along with the provision of a clear pathway detailing how decisions to amend the Go-live period value will be assessed and undertaken in the future. 27/5: Forum consensus that this risk should be further discussed when considering the topic of Regulation. COMPLETE: 22/6 - The Chair has written to Ofgem seeking views on any indicative view they currently have on process timeline for any change to the Standstill Period parameter / review post go-live. 4/7: Ofgem responded advising that they don't yet have a developed approach to the review of the standstill period post go live, but it is one of the things that they will be looking to develop over the next few months. Ofgem noted that the questions set out will be very useful in helping to focus on the questions to which Suppliers are keen to have early answers. 	CLOSED
10	<p>Faster switching with shorter supply periods (particularly for multiple switches in a short period of time) will result in an inability for Suppliers to recover fixed costs over the lifetime of contracts (e.g. PCW charges, cost of sales)</p> <p>TOPIC: Debt-Hopping</p>	<p>This may result in tighter terms and conditions or higher termination fees being introduced across the market, unfairly treating some consumers over others and risking reducing consumer mobility.</p>	<ul style="list-style-type: none"> Further consideration is required to better understand the negative financial impacts to Suppliers and any potential mitigations. COMPLETE: 20/8 - The topic of Debt-Hopping was discussed at CJF17 on 18 August. Whilst it will be possible for consumers to switch more quickly, it is not known whether this will mean that they will. Concerns associated with debt-hopping and potential for monitoring has been raised with RECCo and Ofgem. 	CLOSED
11	<p>With the closure of the Consumer Journey Forum there will no longer be a forum within the switching programme structure to specifically discuss and progress risks and issues associated with the consumer journey.</p>	<p>This could result in valid consumer related risks and issues being side-lined or ignored, resulting in negative consumer impacts and experiences at go-live, potentially impacting the overall delivery of the business case.</p>	<ul style="list-style-type: none"> Consideration should be given by the switching programme to how consumer journey / consumer impacting risks and issues should be progressed for the remainder of the programme. COMPLETE: 27/5 - The CJF has been re-constituted. 	CLOSED

ID	RISKS	IMPACT	NEXT STEPS	Status
12	<p>There is a risk that the CSS processing takes too long to permit the processing of switch requests (SR) that are dependent upon Registration Data validation (e.g. SR6.23) at various stages in the journey.</p> <p>TOPIC: Switch Processing</p>	<p>This could result in some SRs failing unnecessarily under the new switching arrangements. Where SR6.23 fails specifically, the 'gaining' Supplier will not be able to communicate with the SMETS2 meter.</p>	<ul style="list-style-type: none"> Further consideration is required to further assess and consider any required process solutions. COMPLETE: 20/8 - The topic of Switch Processing was discussed at CJF16 & CJF17 with a response being provided by DCC (see meeting notes from CJF17 on 18 August). 	CLOSED
13	<p>There is a risk that issuing and delivery of physical Pre-payment devices will not be possible in the 5 day / next day switch scenario.</p> <p>TOPIC: Prepayment</p>	<p>This could result in consumers not having devices available at the point of new supply.</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed to assess potential impacts and any mitigations. Requirement to ensure switches can be completed in accordance with licence requirements. COMPLETE: 20/8 - The topic of Prepayment was discussed at CJF17 on 18 August. It was noted that it will be the responsibility of individual Suppliers to meet associated licence obligations and Suppliers were advised to raise any concerns they may have on device delivery challenges to Ofgem. 	CLOSED
14	<p>There is a risk that the new Supplier may not be able to reinstate the terms of the previous supplier during a Pre-payment meter switch with a SMETS1 Smart Meter.</p> <p>TOPIC: Smart Metering</p>	<p>This could result in a poor consumer experience where the consumer believed they had a Smart Meter and existing terms would be maintained.</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed to assess potential impacts and any required process solutions. 27/5: Forum consensus that this risk should be further discussed when considering the topic of Smart Metering. 22/6: The topic of Smart Metering will be discussed at CJF18 on 22 September. 	Ongoing
15	<p>There is a risk of incomplete or inconsistent Metering Agent flows and appointments if multiple switches occur in quick succession or if Standstill is set to zero.</p> <p>TOPIC: Switch Processing</p>	<p>This could result in complex exception processes being required resulting in supplier costs and poor consumer experience.</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed to assess potential impacts and any required process solutions. 27/5: Forum consensus that this risk should be further discussed when considering the topic of Switch Processing. COMPLETE: 21/7 - The CJF agreed to close this risk as the requirement for the provision of Metering Agent flows are the responsibility of the Supplier and any impacts should be picked up as part of individual Business Readiness activities. 	CLOSED

ID	RISKS	IMPACT	NEXT STEPS	Status
16	<p>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.</p> <p>TOPIC: Opening Reads</p>	<p>Industry processing impact of accurately allocating Change of Supplier reads and consequential impact on consumer experience and customer billing</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed to assess potential impacts and any financial implications. 27/5: Forum consensus that this risk should be further discussed when considering the topic of Opening Reads. COMPLETE: 20/8 – DCC provided a response at CJF17 on 18 August, noting that it is believed that this risk exists today and is unaffected by CSS as it occurs in a period of time after a switch has taken place. Overlapping, multiple switches may complicate things but this will need to be managed by impacted Suppliers. 	CLOSED
17	<p>There is a risk that consumers can switch before the 28 day period when discretionary credit can be considered debt, thus building up debt without objection as they go.</p> <p>TOPIC: Prepayment</p>	<p>Supplier increase in debt provision, resulting in potential increase of tariffs and inequitable treatment of consumers.</p>	<ul style="list-style-type: none"> Further consideration is required to better understand the negative financial impacts to Suppliers and any potential mitigations. The topic of Prepayment was discussed at CJF17 on 18 August. 20/8: The Chair has written to Ofgem expressing Supplier concerns (Action C1-025). 	Ongoing
18	<p>There is a risk that the DNO and the gaining Supplier may hold different information about a customer (vulnerability).</p> <p>TOPIC: Vulnerability/PSR</p>	<p>Missing essential information about a customer may result in a failure to provide the correct support.</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed to assess potential impacts and any required process solutions. 27/5: Forum consensus that this risk should be further discussed when considering the topic of Vulnerability/PSR. COMPLETE: 21/7 - The CJF agreed that nothing WILL materially change with the introduction of FMRS, existing Gas & Electricity processes for holding data are not changing. 	CLOSED
19	<p>There is a risk that engagement challenges with vulnerable customers increase due to the perception of increased barriers.</p> <p>TOPIC: Vulnerability/PSR</p>	<p>Communications are misunderstood or not acted on sufficiently early.</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed, potentially in liaison with relevant customer groups, to assess potential impacts and any mitigations. 27/5: What further Forum consideration is required on this risk? 20/8: The topic of Vulnerability/PSR was discussed at CJF16 on 21 July and will be further discussed at CJF18 on 22 September. 	Ongoing

ID	RISKS	IMPACT	NEXT STEPS	Status
20	<p>There is a risk that the Debt Assignment Protocol entry and negotiation processes are protracted and complex.</p> <p>TOPIC: Prepayment</p>	<p>This could result in consumers being able to hop several times in new faster Switching environment, leaving a legacy of small debt with a number of 'new' Suppliers.</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed to assess potential impacts and any financial implications. 27/5: Forum consensus that this risk should be further discussed when considering the topic of Prepayment. 20/8: The topic of Prepayment will be discussed at CJF17 on 18 August and it was agreed that further consideration was required at a future CJF session (scheduled for October). 	Ongoing
21	<p>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.</p> <p>TOPIC: Opening Reads</p>	<p>This could result in potential logistic issues relating to the appointment and arrangement for an meter reading agent to attend and obtain an opening read and submit to the Supplier who submits it onto industry parties (Xoserve etc.).</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed to assess potential impacts and any required process solutions. COMPLETE: 20/8 – DCC provided a response at CJF17 on 18 August, see meeting notes (a matter for impacted Suppliers to resolve between themselves as it does not impact the switch itself). Noted that there would need to be a change to the industry process for opening reads should the Standstill Period be reduced in the future. 	CLOSED
22	<p>Lack of clarity on the E2E design.</p> <p>TOPIC: Regulation</p>	<p>This is likely to manifest in delays to testing or increased operational issues. Identified by the Programme as a current issue and in the process of resolution, hence low priority.</p>	<ul style="list-style-type: none"> Ongoing consideration and awareness is required by the switching programme, on the status of design clarity, to ensure there are no impacts to testing or consequential programme delays. 27/5: Forum consensus that a degree of uncertainty on design clarity remains and that further discussion on this topic is required. COMPLETE: 20/8 – whilst some parties note that there continues to be design clarity concerns, there are established programme arrangements in place to raise these (via the Design Forum, the REC and other working groups). Noted that there is requirement to potentially revisit concerns when the Enduring Change of Supply (ECOS) architecture is more visible. 	CLOSED
23	<p>There is a risk associated with the consumer experience around cutover to the new arrangements.</p> <p>TOPIC: Transition/Cutover</p>	<p>This could result in problems or confusion with the consumer switching experience during a short period of time both before and after the Go-Live date.</p>	<ul style="list-style-type: none"> New 27/5: Forum consensus that this risk should be further discussed when considering the topic of Transition/Cutover. 22/6: The topic of Transition/Cutover will be discussed at CJF18 on 22 September. 	Ongoing

Consumer Journey Forum - Risk Register

20 August 2021








ID	RISKS	IMPACT	NEXT STEPS	Status
24	<p>There is a potential risk associated with outages and traffic management by the DCC.</p> <p>TOPIC: Switch Processing</p>	<p>This could negatively impact the ability for Suppliers to undertake processes in a timely manner, such as completing the billing process in time.</p>	<ul style="list-style-type: none"> • 27/5: Forum consensus that this risk should be further discussed when considering the topic of Switch Processing. • The topic of Switch Processing was discussed at CJF16 on 21 July. • COMPLETE: 20/8 – DCC provided a clarifying response at CJF17 on 18 August, see meeting notes 	CLOSED
25	<p>There is a requirement to engage with SECAS about the change to DNO credentials.</p> <p>TOPIC: Smart Metering</p>	<p>Concern about changing credentials and possible implications to information used in gas emergencies.</p>	<ul style="list-style-type: none"> • 27/5: Forum consensus that this risk should be further discussed when considering the topic of Smart Metering. • 22/6: The topic of Smart Metering will be discussed at CJF18 on 22 September. 	Ongoing
26	<p>There are concerns about how Suppliers will access and use the Retail Energy Location.</p> <p>TOPIC: Retail Energy Location</p>	<p>Concern about how the arrangements, as currently articulated to Suppliers, may have a detrimental impact to the acquisition process and the overall consumer journey / experience.</p>	<ul style="list-style-type: none"> • New 22/6: There are ongoing discussions with DCC and Ofgem on Supplier concerns. 	Ongoing

9. Work Plan & Diary Planning

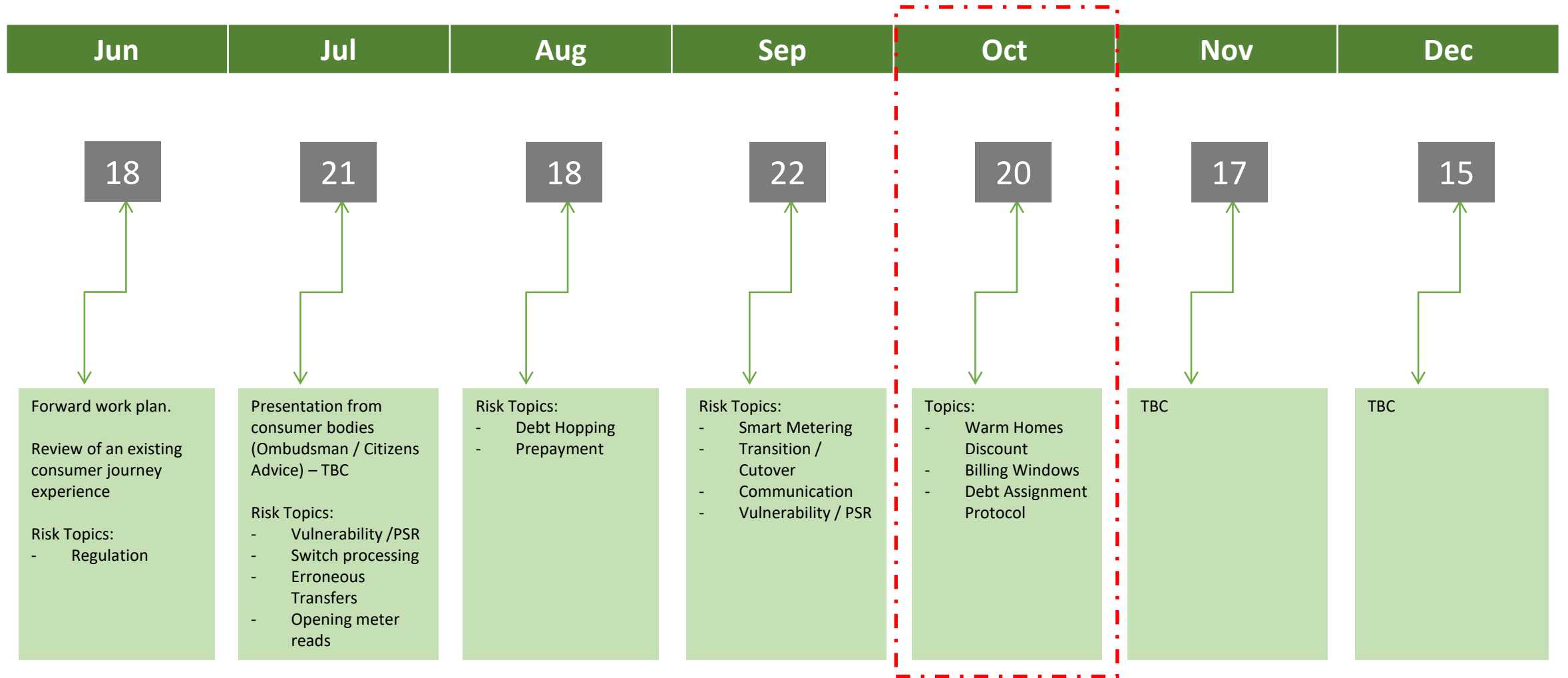
Future Meeting Dates

Date	Time	Meeting
<i>Wednesday 20 October</i>	<i>2pm</i>	<i>Consumer Journey Forum 19</i>
<i>Wednesday 24 November</i>	<i>2pm</i>	<i>Consumer Journey Forum 20</i>
<i>Thursday 16 December</i>	<i>2pm</i>	<i>Consumer Journey Forum 21</i>

Work Plan - topics for future CJF consideration

Topic	Risk Ref.	Discussion	Notes
Communication	1	To be discussed at CJF18 on 22 September	Requirement to consider more generic (non-PCW sales channel) communication and engagement topics.
Debt Hopping 	4, 10	To be discussed at CJF17 on 18 August	Some concern expressed that this topic is not being picked up elsewhere in the programme.
Regulation 	6, 9, 22	Discussed at CJF15 on 22 June	Concerns about multiple change of supplier events, cooling-off, standstill and clarity of E2E design.
Prepayment 	7, 13, 17, 20	To be discussed at CJF17 on 18 August	Concerns about misdirected payments, delivery of physical prepayment devices, discretionary credit, debt assignment protocol and PPMIPs.
Smart Metering	14, 25	To be discussed at CJF18 on 22 September	Concerns related to SMETS1 switches and engagement with SECAS about the change to DNO credentials.
Switch Processing 	12, 15, 24	Discussed at CJF16 on 21 July	Concerns about processing of switch requests, metering agent flows and DCC outages & traffic management.
Vulnerability / PSR 	18, 19	Discussed at CJF16 on 21 July	Potential differences of information held between Suppliers & DNOs and engagement challenges.
Opening Meter Reads 	16, 21	Discussed at CJF16 on 21 July	Concerns associated with ability to meet obligations for opening meter reads and replacement / disputed / missing reads.
Transition / Cutover	23	To be discussed at CJF18 on 22 September	Consumer experience considerations associated with cutover to the new arrangements.
Erroneous Transfers 		Discussed at CJF16 on 21 July	There is a need to continue the focus on ETs and how work on the ET Performance Assurance Board will be progressed.

Proposed approach for future CJF meetings



10. AOB
