



PCW/Supplier Forum

Main Forum – Meeting 5
25 August 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 & meeting aims (including summary of topics concluded)</i>
2	<i>Discussion:</i> <ul style="list-style-type: none">• <i>Transition / Cutover arrangements</i>• <i>Process failures (errors, rejections & erroneous transfers)</i>• <i>Recap – Consent to bill during cool-off</i>
3	<i>Progress against Questions (Terms of Reference)</i>
4	<i>Auto-Switching session on 14 September</i>
5	<i>Update from Data Capture, Validation & Transfer Working Group</i>
6	<i>Update from Consumer Communication & Engagement Working Group</i>
7	<i>BEIS Energy White Paper update</i>
8	<i>Actions Log update</i>
9	<i>Risk Register review</i>
10	<i>Diary Planning</i>
11	<i>AOB</i>

Subjective assessment of progress/outlook

Topic	Initial RAG	Last month	Today	Outlook
Terms of Reference and objectives				Forum continues to be well supported with high engagement. The participation and interest from PCWs is a significant contributor to the objective of defining and mitigating some of the programme implementation risk.
Scope				Progress remains on track for delivery of the full scope of the ToR within the original timescale. The Government consultation on TPIs in energy has been launched and has no bearing on this project. It is conceivable, however, that outputs might be considered within the call for evidence that informs future decisions on the need for regulation.
Risk management				No significant new risks have been identified in the last month. Questions over the REL and PCW access to Data Enquiry Services are still open.
Actions				The number of open actions is reducing. The nature of the forum is that most are likely to become recommendations, for progression by industry participants.

Forum 'Inbox'

- The Inbox is regarded as manageable with numerous topics now considered as having progressed sufficiently to merit as being classed as 'discussions concluded'.

Topic areas concluded

- ✓ Vulnerability / Priority Services Register
- ✓ Credit Vetting
- ✓ Consumer consent to bill during cool-off
- ✓ Opening Meter Readings
- ✓ Forward-dated switch requests
- ✓ Determining the Supply Start Date
- ✓ Relevant Date
- ✓ Prepayment meters
- ✓ Confidence Code
- ✓ Energy Switch Guarantee
- ✓ Collective Switching
- ✓ Objections
- ✓ Warm Homes Discount
- ✓ PCW switching programme engagement
- ✓ Standstill Period
- ✓ OFAF (One-fail-all-fail)
- ✓ Micro-Business Strategic Review
- ✓ Market Sector Indicator
- ✓ Cooling-off Period / messaging
- ✓ Differing Supplier offerings (switch speeds) at go-live
- ✓ Ownership of the consumer relationship
- ✓ Testing arrangements
- ✓ Meter Types/appropriate tariffs
- ✓ Data Transfer
- ✓ Change of Tenancy
- ✓ Potential for Consumer comms confusion
- ✓ Feedback mechanisms

Open topics (including)

- Auto-Switching
- Transition/Cutover
- Data Validation
- Use of/access to Enquiry Services
- Retail Energy Location
- Consumer Messaging principles
- Consumer Journey perspective
- Process failures (errors, rejections, erroneous transfers)

Topic	X-Ref.	Update
Collective Switching	Risk R012 Question 17	The following position has been endorsed by the Forum and communicated to the switching programme/Ofgem. <i>'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.'</i>
Confidence Code	ToR 4.5.4 Question 34	The following position has been endorsed by the Forum and communicated to Ofgem. <i>'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.'</i>
Energy Switch Guarantee	ToR 4.5.4 Question 35	The following position has been endorsed by the Forum and communicated to the independent Chair of the Energy Switch Guarantee. <i>'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.'</i>
Definition of Relevant Date (when the switch 'clock' starts)	Risk R008 Question 21, 31, 32	The following position has been discussed and understood by Forum members. <i>'Ofgem have published updated proposed drafting for the gas and electricity supply licences in May 2021, which includes an updated definition of 'Relevant Date' – see clause 14A.20. In practice, the switch 'clock' will start at the point when the Supplier determines that sufficient information to conduct the switch has been provided, regardless of the sales channel.'</i>
Customer Requested Switch Dates	ToR 4.4.4 Question 22	The following position has been endorsed by the Forum. <i>'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.'</i>
Credit Vetting	Question 14	The following position has been endorsed by the Forum. <i>'The Forum agrees that there will be no changes required to the existing Data Capture requirements that enable credit vetting to take place.'</i>

Topic	X-Ref.	Update
Consumer consent to bill during cool-off	Question 30	<p>The Forum has mixed views on the interpretation of the Supply Licence & Statutory Instrument obligations, however there is Supplier consensus that express consent must be received by the consumer.</p> <p><i>'There is a requirement for the existing Data Capture arrangements to be amended such that express consent (or not) from the consumer is captured at the point of sale and subsequently provided by the PCW to the acquiring Supplier. The process required for delivering this, including the wording to be used to explain the consent to the consumer, will be subject to bilateral agreement between the PCW and the Supplier.'</i></p>
Opening Meter Reads	Question 3	<p>The Forum has mixed views on the potential benefits of capturing an opening meter reads at the point of sale. It has been noted that there are differences between future gas and electricity opening meter read arrangements and this has been flagged to Ofgem. The following position has therefore been endorsed by the Forum.</p> <p><i>'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.'</i></p>
Prepayment meters		<p>The following position has been endorsed by the Forum.</p> <p><i>'There is a general consensus that no specific messaging from PCWs is necessarily required for prepayment meter switch requests (as standard), though it has been acknowledged that some Suppliers may wish to bilaterally agree bespoke messaging with a PCW.'</i></p>
Vulnerability / Priority Services Register	Question 5	<p>The Forum acknowledged 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.</p> <p><i>'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.'</i></p>

Topic	X-Ref.	Update
Objections	Question 20	Forum discussions have concluded and are summarised below. <i>'The current rules on why existing Suppliers may object will continue to be valid under faster switching arrangements. 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.'</i>
Determining the Supply Start Date (SSD)	Question 21	The following position has been endorsed by the Forum. <i>'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.'</i>
PCW switching programme engagement	Risk R011	This topic has been concluded. <i>'Ofgem have confirmed that all switching programme meetings and events, with the exception of the three overarching governance groups, are open for attendance by any impacted or interested party. PCWs are therefore welcome to attend and actively engage. In addition the DCC have established a monthly switching programme engagement/update session with PCWs and a separate series of sessions are being undertaken by the DCC to provide further information about the Retail Energy Location.'</i>
Warm Homes Discount (WHD)		This topic has been concluded. <i>'The Forum noted that PCWs who are signatories to and complying with the Ofgem Confidence Code will include this requirement, for other it will remain discretionary. There are no additional implication associated with the implementation of faster switching.'</i>
Standstill Period	Question 18, 19	This topic has been concluded. <i>'The Forum acknowledges that the Standstill Period is a configurable value, that will be initially set to five calendar days from go-live, with Ofgem having a longer-term expectation to review post go-live and potentially amend the period to zero. It was agreed by the Forum, that Suppliers should be responsible to checking the Standstill Period status before setting the Supply Start Date and submitting the switch request to the CSS.'</i>
One Fail All Fail (OFAF)	Question 25	The following position has been endorsed by the Forum. <i>'As there is no material change to the current circumstances associated with the progression of dual fuel switches, it has been concluded that there are no OFAF related implications to the PCW-Supplier processes associated with the introduction of the new switching arrangements.'</i>

PCW/Supplier Forum

'Forum Inbox' Topic Tracker – Topics Concluded

Version Date: 24 August 2021

Topic	X-Ref.	Update
Ofgem Micro-Business Strategic Review outcomes		This topic has been concluded. <i>'The Forum has agreed to keep this on the horizon in case there are any consequential impacts, but the focus of the group remains on the domestic market in line with the Terms of Reference.'</i>
Market Sector Indicator		This topic has been concluded. <i>'Noting that the CSS will utilise the current Market Sector Indicator (MSI) that is held on file for the current switch, the Forum has agreed that the MSI is not a piece of data that is critical to the success of the current switch and that there is no new data capture requirement of PCWs. It is acknowledged that the Supplier is responsible for updating the MSI for future switches when advised of any changes.'</i>
Cooling-off Period	Question 18, 30, 32	This topic has been concluded. <i>'Historically there has not been a consistent understanding across parties, of when the cooling-off period commences. The Forum has explored the legal definition, as detailed with the Statutory Instrument, and are in agreement that: 'the cooling-off period begins the day after the day that the consumer enters into a contract with the Supplier' and that consensus that it does not commence at the point when the consumer completes their data entry into the PCW website. In terms of consumer messaging, it was agreed that it should be accurate and in accordance with the definition and that any guidance should be very simple and leave individual parties scope to adjust content to reflect agreements and their own capabilities.'</i>
Differing Supplier offerings (switch speeds) at go-live	Question 26	This topic has been concluded. <i>'The Supply Licence sets out the period of time it should take for a switch to complete. It is noted that Ofgem have a short-medium term aspiration that all Suppliers move towards a next day switch as standard. At the point of FMRS go-live, the switching timeframes being offered by Suppliers will vary dependant upon a number of factors. This should not be a concern for PCWs as the Forum have separately agreed that Suppliers are best placed to determine the Supply Start Date and be responsible for communicating this date to the consumer.'</i>
Ownership of the consumer relationship	Question 24	This topic has been concluded. <i>'It is generally accepted by Forum members that the 'ownership' of the consumer resides with the new Supplier from the point of hand-off from the PCW. It has been noted that there are established, bi-lateral feedback mechanisms in place, which enable PCWs and Suppliers to communicate with each other.'</i>

PCW/Supplier Forum

'Forum Inbox' Topic Tracker – Topics Concluded

Version Date: 24 August 2021

Topic	X-Ref.	Update
Metering data (rejections / tariff errors)	Risk R006 Question 4	The following position has been approved by the Forum. <i>'Suppliers and PCWs are committed to using the data supplied by customers to ensure that the best and most appropriate deals are offered. Suppliers will specify to PCWs how information on meter types should (or should not) be used to select available tariffs, and any conditions that may apply.'</i>
Change of Tenancy	Risk R009 Question 16	The following position has been approved by the Forum. <i>'There are no new Change of Tenancy requirements being introduced by the implementation of Faster and More Reliable Switching arrangements. Forum members agree that any specific Supplier requirements relating to the capture of CoT related information at the point of sale, can be progressed via their bi-lateral arrangements with PCWs.'</i>
Data Transfer mechanisms/ timeliness of data provision	Risk R004 ToR 4.3.3 Question 10, 11	The Forum has agreed the following position. <i>'The processes for data transfer between PCWs and Suppliers are agreed bilaterally. Though not directly impacted by the introduction of Faster and More Reliable Switching, Forum members agree that process improvements should be progressed when appropriate to increase the frequency and speed of transfer.'</i>
Testing arrangements	Risk R001	The following position has been approved by the Forum. <i>'Forum members agree that, in addition to the E2E Testing being delivered by the switching programme, it is also important to test the PCW-Supplier processes that occur prior to a switch request being submitted to the CSS. In the absence of any established mechanism to deliver such testing and being cognisant of the differing processes that are currently utilised by PCW's and Suppliers, governed by myriad bi-lateral commercial agreements, there is a consensus that individual parties are best placed to decide (in partnership with their commercial partners) what elements of the process to test, how best to execute these tests and the most appropriate time to conduct them ahead of go-live.'</i>
Potential for consumer comms confusion (reduced timeframe for multiple comms)	Risk R007	The following position has been agreed by the Forum. <i>'The Forum has concluded that there are no specific concerns about the potential for consumer comms confusion. There are established hand-offs between PCWs and new Suppliers and in the future there will be less opportunity for any 'old' Supplier save activity given the truncated switching timeframe.'</i>
Feedback mechanisms	ToR 4.3.5 Risk R005 Question 13	The following position has been agreed by the Forum. <i>'The Forum has concluded that there are established hand-offs already in place between PCWs and new Suppliers.'</i>

PCW/Supplier Forum

'Forum Inbox' Topic Tracker – Topics Ongoing

Version Date: 24 August 2021

Topic	X-Ref.	Update
Retail Energy Location	Risk R011 Question 9	<i>Both Suppliers and PCWs have a number of concerns and questions relating to access to and use of the REL. Both DCC and Ofgem are engaged, with the DCC due to schedule a follow-up information session for all parties soon.</i>
Auto-Switching	Risk R009 Question 15, 23	<i>Whilst this topic is out of scope of the Terms of Reference, RECCo has agreed to sponsor an additional session to discuss this topic. This session is scheduled to take place on 14 September.</i>
Process failures (errors, rejections & erroneous transfers)	Question 12	<i>This topic will be discussed at the Main Forum meeting on 25 August.</i>
Transition / Cutover implications		<i>This topic will be discussed at the Main Forum meeting on 25 August.</i>
Data Enquiry Services	Risk R002 Risk R010 Question 7, 8	<i>This topic will be further discussed at meeting 4 of the Data Capture, Validation & Transfer Working Group on 28 July.</i>
Consumer Messaging principles	Question 21, 27	<i>Topic will be concluded at meeting 5 of the Consumer Communication & Engagement Working Group on 2 September.</i>
Consumer Journey perspective		<i>Topic will be concluded at meeting 5 of the Consumer Communication & Engagement Working Group on 2 September.</i>
Consumer communication & engagement	ToR 4.4.1, 4.4.2, 4.4.3	<i>This topic is being progressed via the Consumer Communication & Engagement Working Group.</i>
General Data Capture requirements at point of sale	Risk R003 ToR 4.3.1, 4.3.2	<i>Topic will be concluded at meeting 5 of the Data Capture, Validation & Transfer Working Group on 9 September.</i>
General Data Validation requirements at point of sale	ToR 4.3.4 Question 6	<i>Topic will be concluded at meeting 5 of the Data Capture, Validation & Transfer Working Group on 9 September.</i>
Future Target Operating Model		<i>This topic will be progressed at the Main Forum on 21 September.</i>

2. Discussion

- Transition / Cutover arrangements
- Process failures (errors, rejections & erroneous transfers)
- Recap – Consent to bill during cool-off

Transition / Cutover arrangements

- Topic discussion deferred until the September Main Forum session

Process failures (errors, rejections & erroneous transfers)

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

Through use of the REL, PCW access to EES and GES, and improved validation of meter types, the number of errors and rejections is expected to reduce. Those that remain will be addressed by Suppliers, with feedback to PCWs where process improvement opportunities at point of sale are identified. There is further discussion scheduled on these issues when auto-switching is considered.

On meter and tariff compatibility, the following statement has been agreed by Forum members:

- *Suppliers and PCWs are committed to using the data supplied by customers to ensure that the best and most appropriate deals are offered. Suppliers will specify to PCWs how information on meter types should (or should not) be used to select available tariffs, and any conditions that may apply.*

Are there any other discussion points on this topic?

Recap - Consent to Bill during cool-off

- The requirement stems from Supply Licence Condition 14.A.3(f) and Clause 36(1) of the Statutory Instrument – *‘The Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013’*
- The proposed drafting of SLC 14.A.3(f) states:
 - *‘the Customer is a Domestic Customer and, having been prompted by the licensee or its representative, they have not expressly requested to start the supply before the expiry of the Cooling Off Period’*
- Clause 36(1) of the Statutory Instrument states:
 - *‘The trader must not begin the supply of a service before the end of the cancellation period provided for in regulation 30(1) unless the consumer –*
 - a) has made an express request, and*
 - b) in the case of an off-premises contract, has made the request on a durable medium.’*
- The Forum had mixed views on the interpretation of the Supply Licence & Statutory Instrument obligations, however there is Supplier consensus that express consent must be received by the consumer.

There is a requirement for the existing Data Capture arrangements to be amended such that express consent (or not) from the consumer is captured at the point of sale and subsequently provided by the PCW to the acquiring Supplier. The process required for delivering this, including the wording to be used to explain the consent to the consumer, will be subject to bilateral agreement between the PCW and the Supplier.’

3. Progress against Questions



Policy & Governance considerations

- Q29: How do obligations, consistent across all Suppliers, get applied to PCWs? **Complete**
- Q30: 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? **Complete**
- Q31: How will PCWs notify Suppliers of the 'clock' start for Suppliers when the switch is initiated through them, recognizing that there could be different timings for different journeys? **Complete**
- Q32: When does the 'clock start ticking' on a new switch request and how does this differ to the commencement of the cooling-off period? **Complete**
- Q33: How can the structure of relationships between Suppliers, PCWs and consumers be future-proofed against regulatory initiatives further down the line? **Complete**
- Q34: Will there be a requirement to make changes to the Confidence Code? **Complete**
- Q35: Are there any implications to the Energy Switch Guarantee arrangements? **Complete**

4. Auto-Switching session preparation

- A specific session is being held on 14 September to discuss issues and concerns specific to Auto-Switching arrangements. As we prepare an appropriate agenda for this session we are keen to hear from Forum members on the following:
 - 1) What are the specific issues and concerns that are currently being encountered by parties engaged in Auto-Switching activities that need to be considered.
 - 2) Any initial views of how these issues might be specifically impacted by the introduction of faster switching arrangements.
 - 3) What is your view of the materiality (size/volume) of Auto-Switching in comparison with overall switching activity.
 - 4) Any other relevant concerns or observations.
- Views welcome by cop on Friday 27 August.

5. Update from Data Capture, Validation & Transfer Working Group

Meeting aims:

- Round-up discussion on Data Capture requirements. Discussion on Data Transfer.
- Revisit Data Validation requirements including next steps on elements requiring additional consideration.
- Discuss and review four risks from the Risk Register, with Forum proposals being presented to close two of the four.
- Final consideration of the process map timings diagram.

Future meeting dates:

- Thursday 9 September – 2pm

Discussion areas:

- Data Capture requirements – review of latest version
- Data Validation:
 - Recap of output from last session
 - Further action required on Supply Point/Consumption data items, linked predominantly to access to industry data and the access to/use of Retail Energy Location
- Update/discussion of the following risks:
 - 002 – Incomplete validation against established industry data sources
 - 010 – Future resilience and availability improvements
 - 006 – Industry metering data triggers unnecessary rejections of errors
 - 009 – Change of Tenancy
- Questions & recap discussions relating to ‘Relevant Date’ and ‘Consent to bill in cool-off’

Key actions:

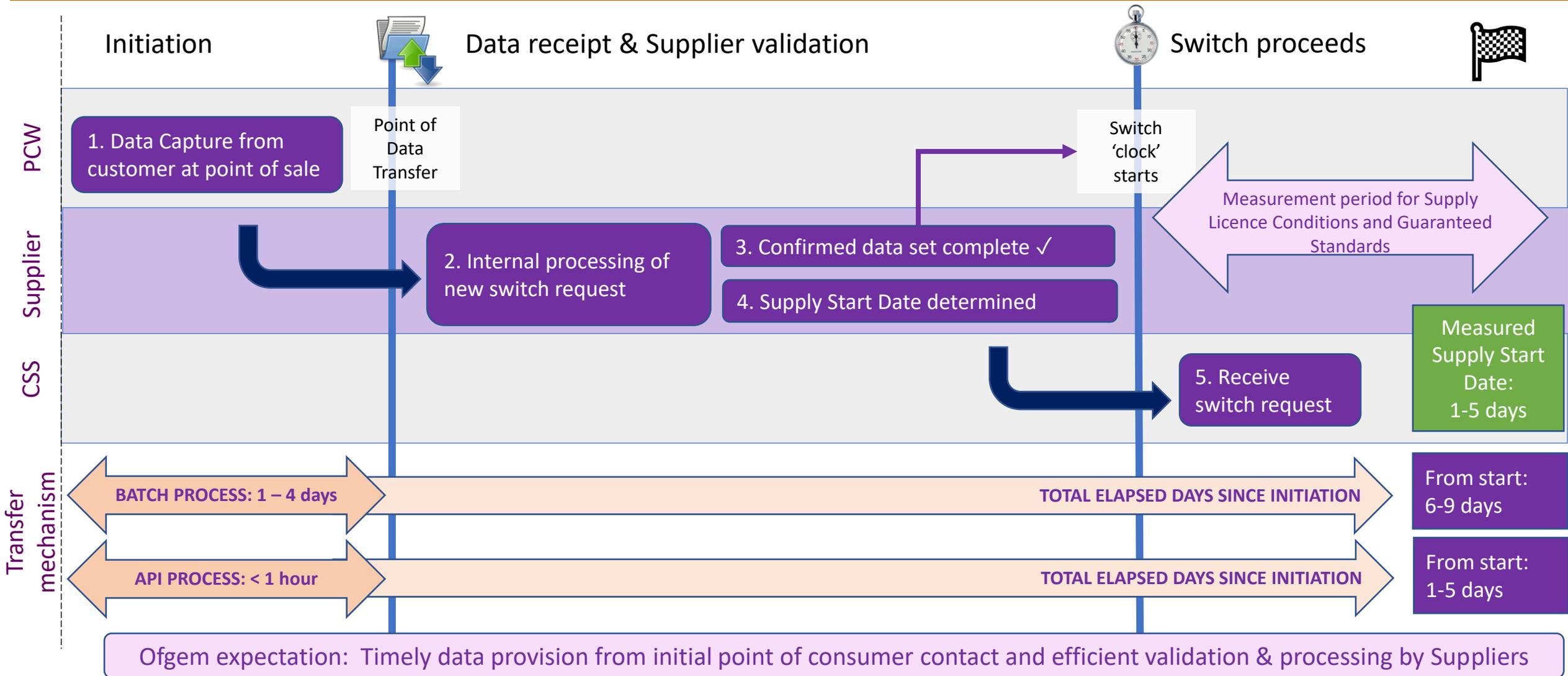
- Data Capture. Circulation of version 0.4 of the Data Capture requirements document for Forum consideration ahead of the final Working Group meeting.
- Data Validation. Ongoing actions to continue to be progressed.
- Relevant Date. Chair to re-circulate links to latest Ofgem Supply Licence drafting (from May 2021).
- Consent to bill in cool-off. Chair to re-circulate relevant details associated with this obligation and details of agreed Forum position.
- DES/ECOES. Chair to write to Data Enquiry Service providers to ascertain confidence levels of future system resilience and availability post FMRS implementation.
- Closure of Risks 006 & 009.

Outlook:

- Final Working Group session to consolidate and conclude work against:
 - The Terms of Reference
 - Questions & Actions
 - Risks & Recommendations
 - Review of working group artefacts

Process map and timings:

Why data transfer processes will become more important



6. Update from the Consumer Communication & Engagement Working Group

Meeting aims:

- Consideration of Consumer Messaging Principles
- Consumer Perspective – expectations & communications, including:
 - Unhappy path messaging, potential for consumer confusion (multiple comms)
 - Timing & consistency of messaging
 - Ownership of the consumer
- Progress against Working Group questions

Future meeting dates:

- Thursday 2 September – 2pm

Discussion areas:

- Consumer Messaging Principles
 - Speed of switch
 - Consent to bill during cool-off
 - Vulnerability
 - Importance of consistent and accurate messaging
- Consumer Perspective
 - Opening Read window differences, timing of final bill
 - No concerns in relation to consumer confusion
 - Ownership of new customer resides with New Supplier (at point of PCW hand-off)
 - Traditional Prepayment an ongoing unhappy path concern
- Good progress has been made to address Working Group questions

Key actions:

- Consumer Messaging Principles. An amended slide to be circulated for review ahead of the final Working Group session.
- Consumer Perspective. An amended slide to be circulated for review ahead of the final Working Group session.

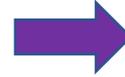
Outlook:

- Final Working Group session to consolidate and conclude work against:
 - The Terms of Reference
 - Questions & Actions
 - Risks & Recommendations
 - Review of working group artefacts

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 the consumer that there is a requirement to clear any outstanding debt with their old Supplier*



• *Should you have any outstanding charges with your current Supplier, it is important to clear these, otherwise 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

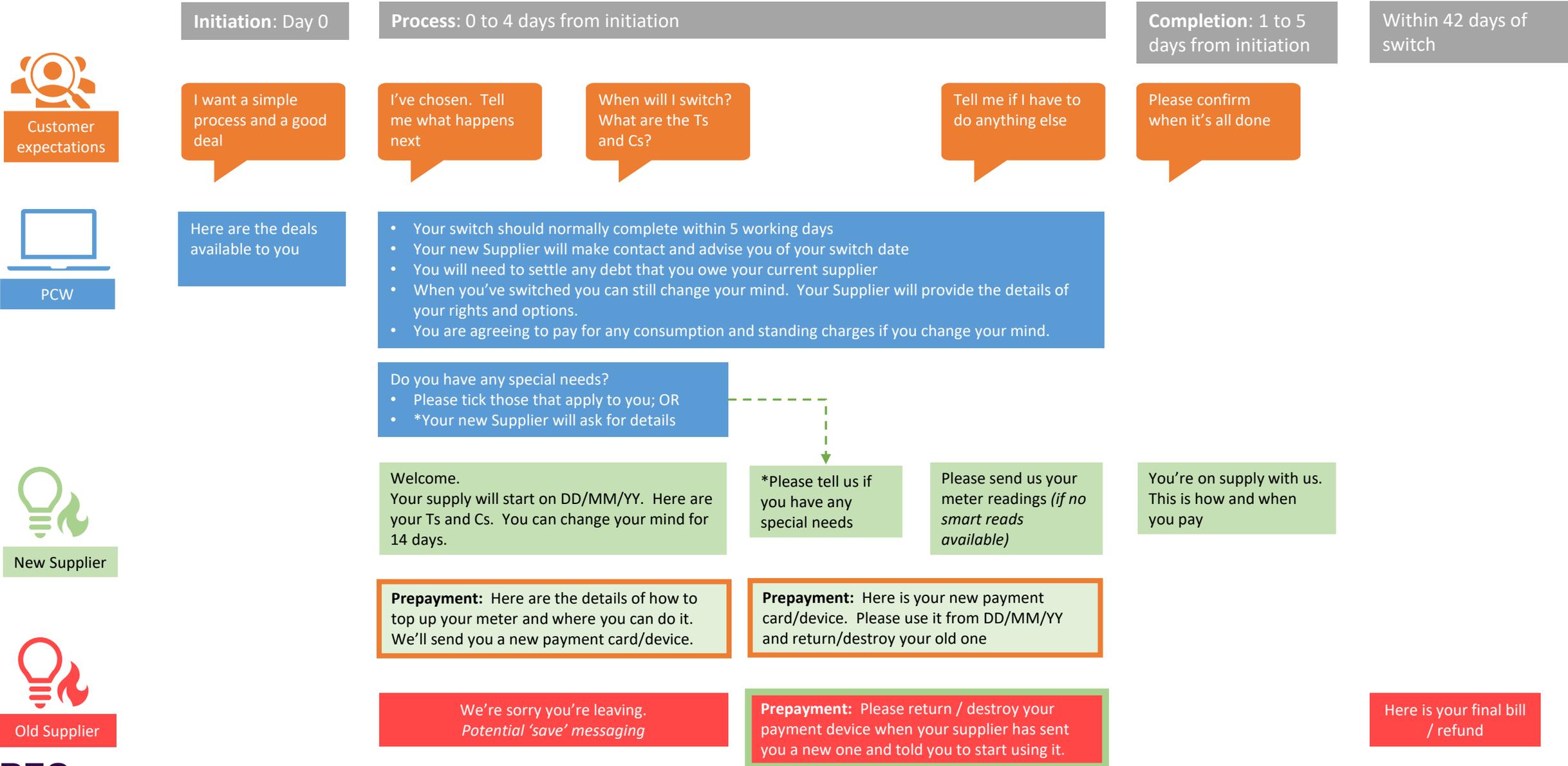
- *Asking the consumer whether they have any special needs or requirements*



• *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



7. BEIS Energy White Paper update

- In December 2020, BEIS published the Energy White Paper – Powering out Net Zero Future.

[Energy White Paper \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/94221/energy-white-paper-2020.pdf)

- Subsequently in July 2021, BEIS published their Energy Retail Market Strategy for the 2020s. It noted that *‘Our forthcoming call for evidence will consider whether to regulate third party intermediaries, such as price comparison websites and brokers’*.

[Energy Retail Market Strategy for the 2020s \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/94221/energy-retail-market-strategy-for-the-2020s.pdf)

- BEIS published the Call for Evidence on 16 August 2021, with a consultation period of 16 weeks.

[Third-party intermediaries in the retail energy market: call for evidence - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/third-party-intermediaries-in-the-retail-energy-market-call-for-evidence)

TPIs in the Retail Energy Market: Call for Evidence

- **TPIs play an important role in helping customers** to engage in the market and make informed choices, **but customers must be adequately protected**. The CFE seeks to understand the extent to there may be (risk of) harm in these areas:
 - A lack of information transparency about market coverage and commercial arrangements with suppliers or other market participants (including incentives, such as commission payments) where this could mislead customers into making a choice they would not otherwise have made
 - Issues arising during the contracting process or from sales practices, including a lack of transparency, mis-selling or misrepresentation, and where customers sign up to a service inappropriate to their needs
 - Adequacy of protections offered to customers, including customers in vulnerable situations who may require additional support
 - The ability for customers to resolve disputes
- Auto-switching: Customers should have sufficient confidence in how an auto-switching service works, and understand the factors that could influence any switching decisions
- 27 Questions (not all relevant to PCWs), for response by 6 December 2021

8. Actions Log

- The Log captures all actions from the Main Forum and Working Group meetings.

PCW/Supplier Forum - Main Forum (page 1)

Actions Log

Version Date: 24 August 2021

Ref	Date raised	Action	Update	Owner	Status
MF1-001	20-Apr-21	Membership of Forum Working Groups. Forum members to advise the Chair via email of expression of interest at the earliest opportunity.	The initial sessions of both Working Group took place on 29 April and 6 May.	Forum members	Complete
MF1-002	20-Apr-21	Working Groups. The Chair to circulate joining details for these meetings to Working Group members.	Joining details for initial Working Group sessions circulated.	GW	Complete
MF1-003	20-Apr-21	Forum contact list. Forum members to advise the Chair of any other individuals within their organisations that require inclusion to the contact list.	The Forum contact list has been updated.	Forum members	Complete
MF1-004	20-Apr-21	Programme REL communication session on 26 April. The Chair agreed to forward on the invite to enquiring Supplier.	Invite forwarded.	Chair	Complete
MF1-005	20-Apr-21	PCW engagement in relevant programme sessions/events. The Chair to speak with Ofgem/the programme to discuss how best/appropriate to include PCWs on future, relevant switching programme events and/or sessions that also have relevance to them.	Ofgem have confirmed that all switching programme meetings and events, with the exception of the three overarching governance groups, are open for attendance by any impacted or interested party. PCWs are therefore welcome to attend and actively engage. (Circulated on 7 May). Follow-up action (MF1-010).	Chair	Complete
MF1-006	20-Apr-21	Concerns relating to Change of Tenancy and auto-switching arrangements. The Chair to add the CoT auto-switch concern to the Forum Risk Register.	This has been added to the Forum Risk Register (R009).	Chair	Complete
MF1-007	20-Apr-21	Performance of Data Enquiry Services. The Chair to add the Enquiry Service resilience and availability concern to the Forum Risk Register.	This has been added to the Forum Risk Register (R010).	Chair	Complete
MF1-008	20-Apr-21	Future engagement with Data Enquiry Service Providers. The Chair to continue to liaise with Enquiry Service providers and extend invites to relevant future sessions.	Ongoing activity. Data Enquiry Service Providers have advised of willingness to present at a future Forum session as required. 27/5 – Forum member action to provide topics for any future presentation by GES & EES service providers. 2/7 – Agreement not to progress any direct engagement until after the DCC REL update session (which will include service providers).	Chair	Complete
MF1-009	20-Apr-21	Forum diary planning. The Chair to issue invites to the Forum contact list for all proposed meeting dates.	Calendar invites have been issued for all future Main Forum meetings.	Chair	Complete
MF1-010	7-May-21	PCW programme engagement. The Chair to engage with the Switching PMO and DCC to consider how to increase PCW awareness of and engagement with programme communications and events.	Ongoing activity with Switching PMO and DCC.	Chair	Complete

PCW/Supplier Forum - Main Forum (page 2)

Actions Log

Version Date: 24 August 2021

Ref	Date raised	Action	Update	Owner	Status
MF1-011	21-May-21	Forum Question sets. The Chair to circulate the initial drafts of question papers to Forum members.	Papers were issued to Forum members by email on 21 May.	Chair	Complete
MF1-012	21-May-21	Confidence Code. PCWs to advise the Chair of any views or observations on potential impacts to the Confidence Code, in addition to those discussed at the Main Forum meeting on 18 May, by cop on 25 May.	Awaiting responses. 14/6 – this topic has been closed, refer to ‘Forum Inbox – topics concluded update slides’	PCWs	Complete
MF1-013	21-May-21	Energy Switch Guarantee. Suppliers to advise the Chair of any views or observations on potential impacts to the Energy Switch Guarantee, in addition to those discussed at the Main Forum meeting on 18 May, by cop on 25 May.	Awaiting responses. 14/6 – this topic has been closed, refer to ‘Forum Inbox – topics concluded update slides’	Suppliers	Complete
MF1-014	21-May-21	Collective Switching. Forum members to advise of any views or observations on collective switching (and proposed way forward) further to discussion on this topic at the Main Forum on 18 May, by cop on 21 May.	Awaiting responses. 14/6 – this topic has been closed, refer to ‘Forum Inbox – topics concluded update slides’	Forum members	Complete
MF1-015	21-May-21	Gas & Electricity Enquiry Services (GES & EES). The Chair to ensure that the topics of GES and EES are discussed at meeting 2 of the Data Capture, Validation & Transfer Working Group on 27 May.	The topic has added to 27 May Working Group agenda. 14/6 – topic discussed at 27/5 session, refer to action MF1-008.	Chair	Complete
MF1-016	21-May-21	Retail Energy Location. DCC to issue an invite for a PCW REL information session.	Expected to be held during week commencing 7 June. Awaiting progression by DCC. 14/6 – session being held on 14 June.	DCC	Complete
MF1-017	21-May-21	Retail Energy Location information session. PCWs to advise the Chair if there are any specific questions that they would like to be addressed at the REL session.	Awaiting responses. 14/6 – session being held on 14 June.	PCWs	Complete
MF1-018	21-May-21	PCW programme engagement. DCC to issue invites for future PCW specific, programme engagement sessions.	Awaiting progression by DCC. 14/6 – a monthly switching programme information/update session with PCWs has now been established by DCC.	DCC	Complete

PCW/Supplier Forum - Main Forum (page 3)

Actions Log

Version Date: 24 August 2021

Ref	Date raised	Action	Update	Owner	Status
MF1-019	16-Jun-21	Forum Topics Concluded. Forum members to review slides 7-9 (Topics Concluded) and provide the Chair with any comments on content.	Awaiting responses from Forum members. 19/7 – no comments have been received, the Topics Concluded information will continue to be updated.	Forum members	Complete
MF1-020	16-Jun-21	Ongoing Forum Topics: Forum members to review slides 10-12 and provide views to the Chair on any additional topic areas that should be included and considered by the Forum.	Awaiting responses from Forum members. 19/7 – no additional topic areas have been received.	Forum members	Complete
MF1-021	16-Jun-21	Question set paper. Forum members to review the paper and provide the Chair with any comments on content.	Awaiting responses from Forum members. 19/7 – no comments received, an updated version has been issued.	Forum members	Complete
MF1-022	16-Jun-21	Risk 001: Testing arrangements. Forum members to consider and provide views to the Chair on two questions. 1) What is the appetite of Forum members to engage with and support testing of the E2E PCW/Supplier process (outside of formal programme testing arrangements)? and 2) What are Forum member views on the scope and structure of any potential testing arrangements?	Awaiting responses from Forum members. 19/7 – limited comments received, update provided at the 20 July Main Forum meeting.	Forum members	Complete
MF1-023	16-Jun-21	Retail Energy Location. Forum members to advise the Chair of any further thoughts or concerns on this topic, further to recent engagements with DCC.	Awaiting responses from Forum members. 19/7 – there were no additional thoughts or concerns provided.	Forum members	Complete
MF1-024	16-Jun-21	Auto-Switching future discussion. The Chair to engage with the RECCo Board and seek to extend the remit and membership of the Forum, to enable a dedicated meeting on Auto-Switching to be undertaken.	18/6 – engagement with RECCo underway. 2/7 – RECCo have agreed to sponsor a separate session to discuss Auto-Switching. Date of session to be confirmed.	Chair	Complete
MF1-025	16-Jun-21	Provision of data – Auto-Switching. All Suppliers are invited to provide examples and volumetric data to the Chair, that can be shared anonymously with the Forum at any future deep dive session on this topic.	Responses being collated ahead of specific Auto-Switching session on 14 September.	Suppliers	Complete
MF1-026	16-Jun-21	Auto-Switching. The Chair to contact the Energy Ombudsman with an invitation to provide any data or comments relating to Auto-Switching.	22/6 – engagement with Citizens Advice and the Energy Ombudsman underway. 19/7 – this will be included within the preparatory activity for the future, one-off Auto-Switching meeting.	Chair	Complete
MF1-027	16-Jun-21	Testing arrangements. The Chair to engage with relevant programme and parties and to ascertain how best to take forward true E2E testing requirements.	Chair to progress. 19/7 – update provided at the 20 July Main Forum meeting.	Chair	Complete

PCW/Supplier Forum - Main Forum (page 4)

Actions Log

Version Date: 24 August 2021

Ref	Date raised	Action	Update	Owner	Status
MF1-028	20-Jul-21	RECCo Presentation (ECOES Access): Forum members are invited to raise any post-meeting questions or queries to the following email address: enquiries@recmanager.co.uk	Action with Forum members to progress as required.	Forum members	Complete
MF1-029	20-Jul-21	Testing Arrangements (Risk 001): Forum members to provide views to the Chair on whether it would (or not) be helpful for the Switching Programme to capture any voluntary testing activity being undertaken at the programme heads towards go-live, as part of the Business Readiness assessment and assurance activity. Note: a zero response will be inferred as there being no concern with the programme potentially including questioning on this within future Business Readiness assessment activity.	Limited response from Forum members. Action complete.	Forum members	Complete
MF1-030	20-Jul-21	Testing Arrangements (Risk 001): The Chair to liaise with Keith Foster (DCC) to ensure this is considered at the forthcoming session(s).	Action complete.	Chair	Complete
MF1-031	20-Jul-21	Testing Arrangements (Risk 001): The Chair to circulate the REL Use Case slides (from the Data Working Group) to the forum for information.	Slides circulated on 22 July alongside meeting notes.	Chair	Complete
MF1-032	20-Jul-21	Topics Concluded: Forum members are requested to review the latest list (slides 14-17) and advise the Chair of any queries/questions.	Responses provided have been considered.	Forum members	Complete
MF1-033	20-Jul-21	OFAP: The Chair agreed to circulate a slide pack that was recently presented by Ofgem to the Regulatory Design User Group on this topic, for information	Slide pack circulated on 22 July alongside meeting notes.	Chair	Complete

Data Capture, Validation & Transfer Working Group (page 1)

Actions Log

Version Date: 24 August 2021

Ref	Date raised	Action	Update	Owner	Status
D1-001	29-Apr-21	Data Capture information. All Forum members to review the Data Capture information on slide 9 and provide comments to the Chair on the data items listed and any additional items that should be included for a domestic switch, based upon current arrangements.	Closed – responses received and discussed at 27/5 Working Group meeting.	Forum members	Complete
D1-002	29-Apr-21	New Data Capture requirements. All Forum members to advise the Chair if there are any additional, new Data Capture requirements introduced by the introduction of faster switching arrangements that need to be considered, other than those captured on slide 10.	Closed – responses received and discussed at 27/5 Working Group meeting.	Forum members	Complete
D1-003	29-Apr-21	Vulnerable Customer/PSR considerations. Although this was not discussed (slide 11 - rolled over to the next WG session), all Forum members to review the questions posed and provide any initial thoughts or comments to the Chair.	Closed – responses received and discussed at 27/5 Working Group meeting.	Forum members	Complete
D1-004	29-Apr-21	Data Capture – Speed of Switch. All Forum members to flag to the Chair any views on whether the speed of switch (5 WD vs Next WD) has any impact on Data Capture requirements.	Closed – responses received and discussed at 27/5 Working Group meeting.	Forum members	Complete
D1-005	29-Apr-21	Auto-Switching and customer consent. The Chair to include the topic of Auto-Switching on a future agenda for future group discussion.	To be considered at the Main Forum meeting in June. 14/6 – this topic has been included on the agenda for the 16 June Main Forum meeting.	Chair	Complete
D1-006	29-Apr-21	Change of Tenancy information capture. The Chair to include the topic of Change of Tenancy information capture at the point of sale on a future agenda for further group discussion.	To be considered at a future Working Group meeting. 14/6 – this topic was discussed at the 27/5 Working Group session.	Chair	Complete
D1-007	29-Apr-21	Change of Tenancy information capture. The Chair to add Change of Tenancy to the list of Questions for this Working Group.	This has been added (Q16) and will be considered by the Working Group in due course.	Chair	Complete
D1-008	29-Apr-21	Domestic / Non-Domestic market sector indicator. All Forum members to consider whether the market sector indicator should be ascertained/captured as standard at the point of sale.	Closed – responses received and discussed at 27/5 Working Group meeting.	Forum members	Complete
D1-009	29-Apr-21	Capture of Warm Homes discount information. All Forum members to consider whether information relating to Warm Homes Discount eligibility should be ascertained/captured as standard at the point of sale.	Closed – responses received and discussed at 27/5 Working Group meeting.	Forum members	Complete

Data Capture, Validation & Transfer Working Group (page 2)

Actions Log

Version Date: 24 August 2021

Ref	Date raised	Action	Update	Owner	Status
D1-010	29-Apr-21	Differing Supplier switch speeds at go-live. The Chair to ensure that the communication of the Supply Start Date to the consumer is picked up by the Consumer Communication & Engagement Working Group.	To be considered at a future Consumer Comms Working Group meeting. 14/6 – this topic was discussed at the 3/6 Working Group session.	Chair	Complete
D1-011	29-Apr-21	Standstill Period. The Chair to ensure that the Standstill Period topic is picked up when the Working Group consider Validation.	To be considered at a future Working Group meeting. 22/6 – this topic will be discussed at the 25/6 Working Group meeting.	Chair	Complete
D1-012	29-Apr-21	Retail Energy Location. The Chair to approach Ofgem/DCC and request that a specific REL information session for PCWs is held at the earliest opportunity.	A request has been made to DCC/Ofgem, which has been positively received. Currently awaiting provision of possible dates. 21/5 update: DCC have confirmed that a PCW REL information session is due to be scheduled for w/c 7 June. Refer to action MF1-016.	Chair	Complete
D1-013	29-Apr-21	Opening Meter Readings. The Chair to provide clarity on the opening meter read windows that will be effective for both gas and electricity at go-live.	Clarity provided and topic discussed at the 27/5 Working Group meeting.	Chair	Complete
D1-014	29-Apr-21	Consumer consent to bill for energy usage during cool-off - obligation. The Chair to provide clarity on where the obligation resides.	Information provided as a post-meeting note within the meeting notes issued on 7 May 2021.	Chair	Complete
D1-015	29-Apr-21	Consumer consent to bill for energy usage during cool-off. The Chair to ensure further consideration on this topic at the Consumer Communication & Engagement Working Group – how should this be explained/presented to the consumer at the point of sale?	Ongoing consideration at Working Group meetings – see Action D1-025.	Chair	Complete
D1-016	29-Apr-21	Working Group diary planning. The Chair to issue calendar invites to the Forum contact list for future Working Group meetings.	Calendar invites for future DCVT Working Group meetings were issued on 6 May 2021.	Chair	Complete
D1-017	27-May-21	Data Capture – further to our discussions on 27 May, please advise the Chair of any further comments you have on the topics of Change of Tenancy, Credit Vetting, Opening Meter Reads, Market Sector Indicator, Consent to bill during cool-off, Consumer Requested switch dates.	Awaiting Forum member responses. 25/6 - Complete.	Forum members	Complete
D1-018	27-May-21	Vulnerability/PSR – consider the questions on slide 19 (of the 27 May slide pack) and advise the Chair of any views you have on this topic and/or any implications associated with the introduction of a faster switching timeframes.	Awaiting Forum member responses. 25/6 – Complete.	Forum members	Complete

Data Capture, Validation & Transfer Working Group (page 3)

Actions Log

Version Date: 24 August 2021

Ref	Date raised	Action	Update	Owner	Status
D1-019	27-May-21	Data Validation – ahead of the June Working Group meeting (on 25 June) please consider the following questions in readiness for discussion. 1) What are the critical data items that require validation? 2) How will validation requirements change (who, when, how etc) with the advent of faster switching?	Awaiting Forum member responses. 24/6 - Complete.	Forum members	Complete
D1-020	27-May-21	Gas & Electricity Enquiry Services – advise the Chair of your views on whether presentation by GES and EES would be beneficial at a future Working Group session. If so why? What would you like to achieve from this? - please consider the following two questions: 1) Are there specific questions or concerns that you have for GES/EES to consider and respond to? 2) Are these questions best answered in writing, through your own bilateral engagement with these parties or through presentation and discussion at this Forum?	Awaiting Forum member responses. 24/6 – Complete.	Forum members	Complete
D1-021	27-May-21	Change of Tenancy. The Chair to seek data on existing usage of the CoT flag.	Information request issued to industry parties. Responses received – there is no industry data available / captured on the use of the CoT flag.	Chair	Complete
D1-022	27-May-21	Change of Tenancy. The Chair to seek data on the number of Erroneous Transfers associated with CoT.	Following engagement with the Chair of the Erroneous Transfers PAB, it has been confirmed that there is no specific information on this and it is something that has not previously been raised as an issue by parties at the ET PAB.	Chair	Complete
D1-023	27-May-21	Opening Meter Reads. The Chair to raise the issue of Opening Read window inconsistency (in gas & electricity) with the switching programme (Ofgem).	To be progressed by the Chair. 16/8 – response from Ofgem: design has been predicated on smart meters. Should there be concerns with inconsistencies between fuels, this can be addressed via industry code change processes.	Chair	Complete
D1-024	27-May-21	Market Sector Indicator. All Forum members to consider how to implement the validation of the Market Sector Indicator ahead of the next Working Group meeting.	Awaiting Forum member responses. 24/6 – Complete.	Forum members	Complete
D1-025	27-May-21	Consent to bill during cool-off. Further written comments are invited from all Forum members on the criticality of capturing consent at the point of sale / any challenges associated with achieving this.	Awaiting Forum member responses. 24/6 – Complete.	Forum members	Complete

Data Capture, Validation & Transfer Working Group (page 4)

Actions Log

Version Date: 24 August 2021

Ref	Date raised	Action	Update	Owner	Status
D1-026	27-May-21	Vulnerability/PSR. All Forum members to provide comments on whether the use of the industry standard data list should be adopted by all parties.	Awaiting Forum member responses. 24/6 – Complete.	Forum members	Complete
D1-027	25-Jun-21	Data Capture – all Forum members to provide any comments on the content of the latest Data Capture Requirements document issued.	Limited response received.	Forum members	Complete
D1-028	25-Jun-21	Data Capture – further to forum discussion and any additional comments received, the Chair to update and circulate for review, a draft final version of the Data Capture Requirements document.	Presented to the 17 August Working Group meeting.	Chair	Complete
D1-029	25-Jun-21	Access to Data Enquiry Services – the Chair to engage with PCWs to ascertain current views on the challenges and blockers that prevent PCW accession to and/or use of the Data Enquiry Services.	Engagement with PCWs undertaken and ongoing.	Chair	Complete
D1-030	25-Jun-21	Access to Consumption Data – the Chair to ascertain what consumption data can be accessed from GES/EES.	The Chair to progress. 18/8 – electricity consumer consumption data (EAC data) is not available as standard via ECOES, but can be obtained on a commercial basis. Noted that this will not be unavailable after Mandatory Half Hourly Settlement is in place.	Chair	Complete
D1-031	25-Jun-21	Future meeting durations – the Chair to amend future meeting invites to 150 minutes duration to ensure adequate time to discuss the remaining topics.	Action complete, future invites have been updated.	Chair	Complete
D1-032	17-Aug-21	Data Capture – the Chair to circulate v0.4 of the Data Capture requirements document for final Forum member review ahead of approval at the next WG meeting on 9 September.	The Chair to progress.	Chair	Ongoing
D1-033	17-Aug-21	Relevant Date – the Chair to circulate links to relevant documentation and agreed Forum position.	Information circulated on 18 August.	Chair	Complete
D1-034	17-Aug-21	Billing consent in cool-off – the Chair to circulate relevant details associated with the obligation and include as an update item at the next meeting of the main Forum.	Information circulated on 19 August.	Chair	Complete
D1-035	17-Aug-21	Risk 010 – Future Resilience & availability improvements – the Chair to write to Data Enquiry service providers and seek information relating to the future resilience and availability of services post implementation of FMRS.	The Chair to progress.	Chair	Ongoing

Consumer Communication & Engagement Working Group (page 1)

Actions Log

Version Date: 24 August 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. 14/6 – this topic has been closed, refer to ‘Forum Inbox – topics concluded update slides’	Forum members	Complete
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. 14/6 – this topic has been discussed and closed, refer to ‘Forum Inbox – topics concluded update slides’	Chair	Complete
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
C1-005	3-Jun-21	Standstill Period. View captured that this could be an interim requirement and a view noted that it is possibly easiest for a Supplier to validate and ensure alignment with Supply Start Date.	Topic to be discussed at the next Data Capture, Validation & Transfer Working meeting on 25 June. 25/6 – topic discussed and concluded at 25 June Working Group meeting.	Chair	Complete
C1-006	3-Jun-21	Unhappy path. A view was expressed that more focus is required on messaging around the ‘unhappy path’ and impacts to consumers.	To be scheduled for discussion at a future Working Group meeting. 30/6 – being initially discussed at 1/7 Working Group meeting.	Chair	Complete
C1-007	3-Jun-21	Cooling-off definition & messaging. There are differing views on when the cooling-off period commences and there is inconsistent messaging within existing communications.	To be scheduled for further discussion at the next Working Group meeting. 25/6 – topic being discussed at 1 July Working Group meeting.	Chair	Complete
C1-008	3-Jun-21	Principles for Consumer messaging. The Chair to prepare a document detailing draft standards and principles for consistent, initial consumer messaging.	To be circulated and discussed at a future Working Group meeting. 25/6 – being discussed at the 1 July Working Group meeting.	Chair	Complete

Consumer Communication & Engagement Working Group (page 2)

Actions Log

Version Date: 24 August 2021

Ref	Date raised	Action	Update	Owner	Status
C1-009	1-Jul-21	Cooling-off definition & messaging. All Forum members to review their consumer messaging on cool-off for current and future arrangements, to ensure accuracy against the Statutory Instrument.	Action upon Forum members to progress as required.	Forum members	Complete
C1-010	1-Jul-21	Consumer Messaging Principles. The Chair to review the draft 'Consumer Messaging Principles' developed so far and set out a simplified version for Forum review.	Revised drafting presented at meeting on 4 August.	Chair	Complete
C1-011	1-Jul-21	Consumer Messaging Principles. The Chair to arrange for the eventual Forum drafting of the 'Consumer Messaging Principles' to be shared with Ofgem for their consideration and comment against any expectations. Approach to be discussed with Norma Wood.	The Chair to progress.	Chair	Ongoing
C1-012	1-Jul-21	Unhappy Path Consumer Messaging. All Forum members to review and consider any 'unhappy' pathway consumer messaging observations, that require specific consideration at the next Working Group meeting – see slide 13 from 1 July meeting slide pack.	Discussed at meeting on 4 August. No comments received pre-meeting.	Forum members	Complete
C1-013	1-Jul-21	Consideration of journey from consumer perspective. All Forum members to review and provide any comments on the content of slide 15 within the 1 July meeting slide pack.	No responses received. Revised slide presented at meeting on 4 August.	Forum members	Complete
C1-014	4-Aug-21	Consumer Messaging Principles. The Chair to amend the Consumer Messaging Principles slide in response to Forum conversation and circulate for review.	Updated and circulated.	Chair	Complete
C1-015	4-Aug-21	Consumer Perspective. The Chair to amend the Consumer Journey perspective slide in response to Forum conversation and circulate for review.	Updated and circulated.	Chair	Complete

9. Risk Register

- Update on status of existing risks.
- Forum consideration of any additional risks for inclusion.
- Identification of any risk that requires immediate escalation.

PCW/Supplier Forum Risk Register (Page 1)

Version Date: 24 August 2021

ID	RISK	DESCRIPTION & IMPACT	NEXT STEPS
R001	Testing arrangements RISK CLOSED	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. 14/6 – this risk is to be considered at the Main Forum meeting 3 on 16 June. 20/7 – the Forum concluded discussions on this risk and agreed that the progression of any testing will be the agreed bilaterally between PCWs and Suppliers.
R002	Incomplete validation against established industry data sources (DES and ECOES). Data Working Group consideration	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. 24/8 – actions are being progressed to identify and address any challenges and blockers (see Risk 014). Wider validation concerns and access to consumption data are being addressed by the Data Capture, Validation & Transfer Working Group.
R003	Inconsistency in Supplier data capture requirements (by PCWs) Data Working Group consideration	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). 18/8 – this is currently being progressed by the Data Capture, Validation & Transfer Working Group
R004	Differing data communication arrangements, between PCWs and Suppliers RISK CLOSED	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. 18/8 – Data Transfer discussions have been completed. The timing of the Energy White Paper will have no impact on the work of this Forum in its current guise.

PCW/Supplier Forum Risks Register (Page 2)

Version Date: 24 August 2021

ID	RISK	DESCRIPTION & IMPACT	NEXT STEPS
R005	Switch status updates and feedback mechanisms between PCWs and Suppliers RISK CLOSED	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. 18/8 – The Forum has concluded that there are established hand-offs already in place between PCWs and new Suppliers.
R006	Industry metering data triggers unnecessary rejections or tariff errors RISK CLOSED	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. 18/8 – Suppliers and PCWs are committed to using the data supplied by customers to ensure that the best and most appropriate deals are offered. Suppliers will specify to PCWs how information on meter types should (or should not) be used to select available tariffs, and any conditions that may apply.
R007	Potential for customer confusion as the timeframe for switch completion dramatically reduces RISK CLOSED	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. 5/8 – the Forum has concluded that there are no specific concerns about the potential for consumer comms confusion. There are established hand-offs between PCWs and new Suppliers and in the future there will be less opportunity go any ‘old’ Supplier save activity given the truncated switching timeframe.
R008	Absolute clarity required of ‘relevant date’ (when the switch clocks starts ticking) RISK CLOSED	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. 14/6 – Ofgem published updated proposed drafting for the gas and electricity supply licences in May 2021, which includes an updated definition of ‘Relevant Date’ – see clause 14A.20. In practice, the switch ‘clock’ will start at the point when the Supplier determines that sufficient information to conduct the switch has ben provided.’

PCW/Supplier Forum Risks Register (Page 3)

Version Date: 24 August 2021

ID	RISK	DESCRIPTION & IMPACT	NEXT STEPS
R009	Change of Tenancy events and Auto-Switching arrangements. Auto-Switching session consideration	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. 14/6 – the topic of Auto-Switching is due to be discussed at the Main Forum meeting 3 on 16 June. 24/8 – a separate session has been agreed to discuss this topic, scheduled for 14 September.
R010	Data Enquiry Services – future resilience and availability improvements. Data Working Group consideration	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. 24/8 – this risk is being considered by the Data Capture, Validation & Transfer Working Group. The Chair has written to both service providers on this topic.
R011	Retail Energy Location – limited PCW engagement/education of REL requirements and impacts RISK CLOSED	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. 14/6 – the DCC held a REL information session for PCWs on 14 June. Future sessions will be established by DCC to follow-up on discussion and actions agreed.
R012	Collective Switching providers – lack of awareness of switching programme RISK CLOSED	There is a risk that parties who are responsible for progressing collective switch arrangements are unaware of the switching programme and therefore unaware of any potential implications, specifically in relation to transition/cutover from the existing to the new arrangements.	14/6 - the Chair has written to the switching programme/Ofgem advising of the position that has been endorsed by the Forum on this topic/risk. <i>'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.'</i>

PCW/Supplier Forum Risks Register (Page 4)

Version Date: 24 August 2021

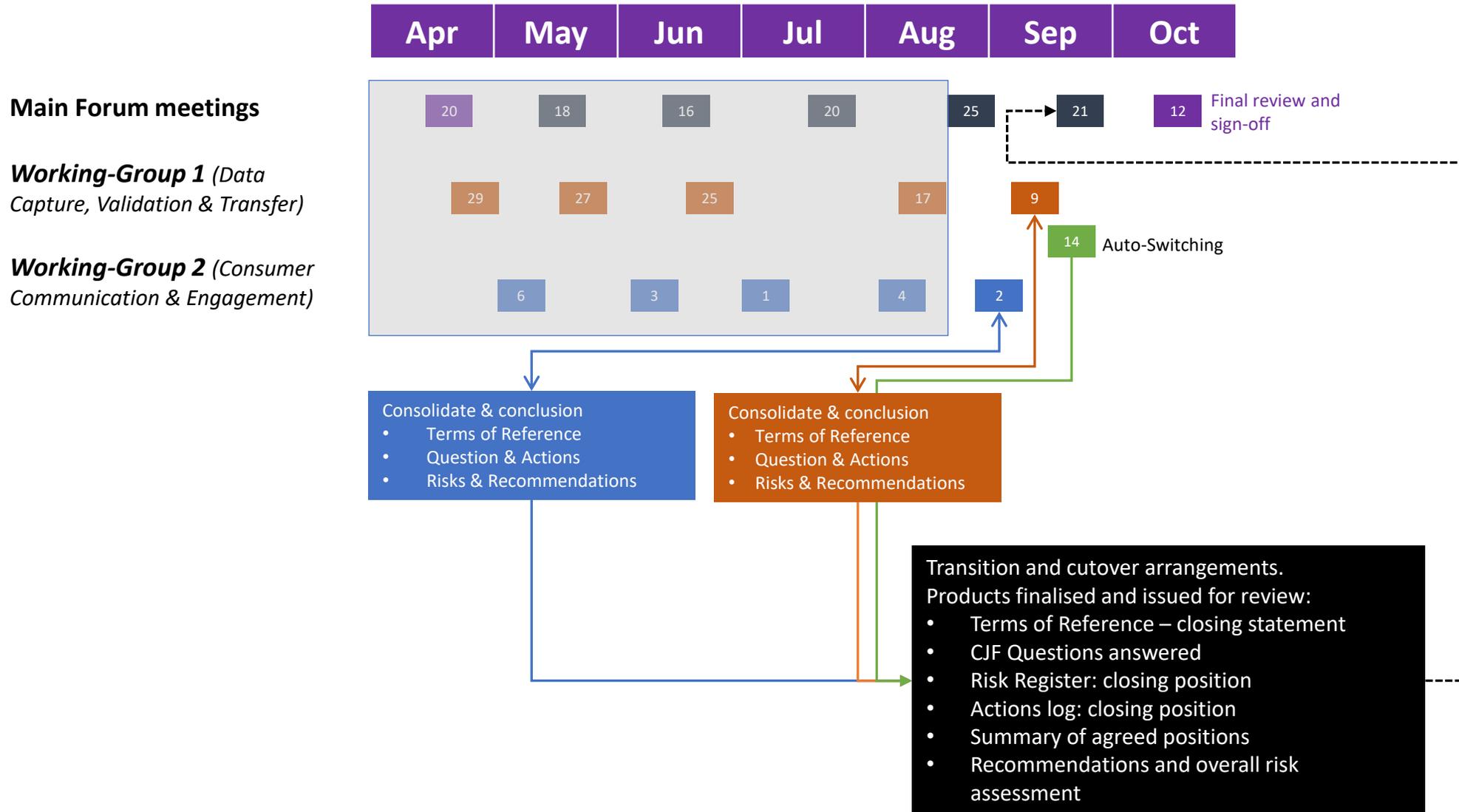
ID	RISK	DESCRIPTION & IMPACT	NEXT STEPS
R013	<p>Retail Energy Location. PCWs and Suppliers have ongoing concerns about how to access and use the REL and the associated changes required to existing processes ahead of go-live.</p> <p>Main Forum consideration</p>	<p>PCWs have noted disappointment that they were not involved or considered in the design and that the change impacts are much higher than anticipated. Supplier have also raised concerns about orchestration and whether the licencing arrangements are fit for purpose. General view that there are currently more 'unknowns than knowns' which prevents parties from having a coherent view of how this will work in practice and what changes will be required.</p>	<p>22/6 - DCC are currently progressing a series of action from the recent Supplier and PCW REL engagement sessions on 14 June. The Chair continues to have ongoing engagement with the DCC and Ofgem on this risk.</p> <p>24/8 – the date of a DCC follow-up meeting on the topic of the REL is 'to be confirmed'.</p>
R014	<p>Data Enquiry Services. Not all PCWs currently have access to the Gas & Electricity Data Enquiry Services.</p> <p>Main Forum consideration</p>	<p>It will be essential for all PCWs to have access to and utilise Gas & Electricity Enquiry Services at the point of go-live.</p>	<p>Engagement required with PCWs, Enquiry Service Providers and Ofgem to fully understand the current blockers and discuss how best to mitigate.</p> <p>24/8 – actions are being progressed to identify and address any challenges and blockers associated with PCW access to GES & EES.</p>

10. Diary Planning & Approach

Future Meeting Dates

Date	Time	Meeting
<i>Thursday 2 September</i>	<i>2pm</i>	<i>Consumer Communication & Engagement Working Group – meeting 5</i>
<i>Thursday 9 September</i>	<i>2pm</i>	<i>Data Capture, Validation & Transfer Working Group – meeting 5</i>
<i>Tuesday 14 September</i>	<i>2pm</i>	<i>Auto-Switching session</i>
<i>Tuesday 21 September</i>	<i>2pm</i>	<i>PCW/Supplier Forum - Main Forum meeting 6</i>
<i>Tuesday 12 October</i>	<i>2pm</i>	<i>PCW/Supplier Forum - Main Forum meeting 7 – final session</i>

Working Group meetings and products



11. AOB

Appendices

Key Acronyms

Acronym	Description
CSS	Centralised Switching Service
DBT	Design, Build & Testing activities to develop the CSS
DCC	Data Communications Company
DES	Gas Data Enquiry Service
DNO	Distribution Network Operator
DSP	DCC's Data Services Provider
E2E	End-to-End (Testing)
EES	Electricity Enquiry Service (future)
ECOES	Electricity Central Online Enquiry Service
ET	Erroneous Transfer
GES	Gas Enquiry Service (future)

Acronym	Description
GSOP	Guaranteed & Overall Standards of Service
GT	Gas Transporter
iDNO	Independent Distribution Network Operator
iGT	Independent Gas Transporter
MPAN	Meter Point Administration Number (Electricity)
MPRN	Meter Point Reference Number (Gas)
MPL	Meter Point Location
OFAF	One Fail All Fail
PAB	Performance Assurance Board
PSR	Priority Services Register
REC	Retail Energy Code

Acronym	Description
RDUG	Regulatory Design User Group
RMP	Registerable Meter Point
SI	System Integrator (Netcompany)
SLC	Supply Licence Condition
SP	Supply Point
SPDG	Switching Programme Delivery Group
SPIG	Switching Programme Implementation Group
SRO	Senior Responsible Officer (Ofgem)
SSD	Supply Start Date
UPRN	Unique Property Reference Number
WHD	Warm Homes Discount

Forum Scope & Terms of Reference

- Enabling structured engagement between PCWs and Suppliers, to identify impacts from implementing Faster & More Reliable Switching in order to minimise risks to programme delivery.
- Primary focus on any changes that are required to ensure a positive consumer journey/experience.

Ofgem's stated objectives for Faster and More Reliable Switching programme are:

- To improve customers' experience of switching and build confidence
- To increase engagement in the retail energy market and facilitate competition
- Ambition for next-day switching

This will require a **reliable, fast and cost-effective process, underpinned by timely and accurate data**. It should provide a platform for product and service innovation.

- The scope of this activity is focussed on **Domestic** change of supplier requests that originate from PCW sales channels **only**, and the identification of risks and issues unique to this channel that may be impacted by the shorter switching timelines.
- It excludes any individual arrangements or agreements that are or need to be in place between parties, commercial or otherwise.
- The Terms of Reference reflect discussions held with interested parties during the Forum preparatory phase in March.

Forum Purpose, Objectives & Deliverables - overview

Data Capture, Validation & Transfer	Consumer Communication & Engagement	Policy & Governance
<p>Capture</p> <ul style="list-style-type: none"> • Minimum data set for a faster switch • Standardisation vs customisation • Vulnerability & PSR • Any new requirements 	<ul style="list-style-type: none"> • Typical consumer journey • Consumer perceptions & expectations • Minimum messaging requirements and timing • Standardisation vs customisation • Treatment of vulnerable consumers • Avoidance of consumer confusion or detriment • Consumer requested Supply Start Dates and tailored requests 	<ul style="list-style-type: none"> • Definition clarity of ‘relevant date’ – when the clock starts ticking for a switch • Understanding regulatory policy baseline and changes to existing arrangements • Licence condition requirements including revised speed of switch • Linkage to Guaranteed Standards and provision of compensation payments • Impacts to Confidence Code and Energy Switch Guarantee arrangements • Consideration of transition from old arrangements to new • Governance of forum outputs
<p>Validation</p> <ul style="list-style-type: none"> • Access to industry data • Expectations & timing • Use of Retail Energy Location 		
<p>Transfer</p> <ul style="list-style-type: none"> • Current & future arrangements • Progression of technology • Standardisation & Ownership 		

Consideration of future Target Operating Model vs requirements for introduction of new arrangements in Summer 2022

Cognisance of progression of the Energy White Paper ‘Powering Net Zero Future’ activity

Forum Purpose, Objectives & Deliverables – overview (continued)

In addition:

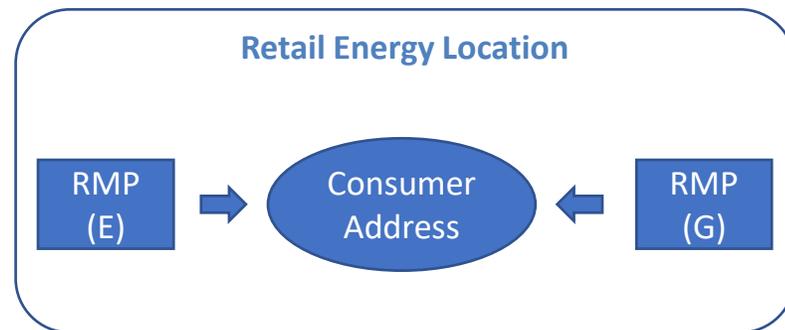
- Consider and address the questions detailed within the Terms of Reference Appendix.
- Enable and promote wide engagement from both PCWs and Suppliers.
- The maintenance and management of a Risks & Issues Log.
- The maintenance of an appropriate Work Plan and meeting schedule.
- Provision of monthly progress updates to the RECCo Board and programme Delivery Group.
- Cross-check with the Non-Domestic sector at an appropriate point.

Overview of Regulatory policies

Topic	Summary
Switch speed	<ul style="list-style-type: none"><i>The CSS is being built and tested to deliver a next working day switch and will permit a future switch date of between 1 & 28 working days.</i><i>Licence obligations will be changed to five working days, from the current twenty-one days at the point of go-live.</i><i>Expectation that a next day switch will become the industry norm, Ofgem not ruling out further regulatory intervention should this not occur.</i>
Relevant date	<ul style="list-style-type: none"><i>The point at which the switch 'clock' starts ticking and from which regulatory obligations commence.</i><i>Ofgem mindful of potential for delays between the point at which PCWs sign up a new customer and the conveyance of information to the gaining Supplier.</i><i>Ofgem to monitor post go-live and believe that a significant step would be the standardisation of data flow and processes between PCWs and Suppliers.</i>
Standstill period	<ul style="list-style-type: none"><i>The period of time following a switch, where a consumer is unable to switch away from their current Supplier.</i><i>A configurable value, set to five calendar days from go-live, with Ofgem having a longer-term wish to reduce the period to zero - when evidence suggests it is appropriate to do so, thus enabling a consumer to potentially switch every day.</i>
Cooling-off	<ul style="list-style-type: none"><i>The period of cool-off will now extend past the point of the effective switch date, whereas today, the cool-off period normally concludes before the switch takes effect. This provides additional complexity to todays arrangements.</i><i>Consumers will have a choice if they decide to invoke their cool-off rights - to return to their previous Supplier on equivalent terms, enter into new contract with a different Supplier or stay with their current Supplier and enter into a new contract,</i><i>Introduction of a new obligation to capture consumer consent for Supplier to bill for energy used during the cool-off period.</i>
Retail Energy Location	<ul style="list-style-type: none"><i>Ofgem view the introduction of the REL as a core feature of the switching reforms to improve reliability.</i><i>The REL will be displayed on ECOES and DES and will be available to all industry parties.</i><i>Ofgem are considering the introduction of obligations to require its utilisation.</i>
Objection window	<ul style="list-style-type: none"><i>The new arrangements will amend the length of the Objection Window (for Suppliers) from five working days, to one working day for Domestic switches and two working days for Non-Domestic switches.</i>

Retail Energy Location*

- *Introduction of the Retail Energy Location (REL) is a core feature of the reforms to improve reliability of switching.*
- *The Retail Energy Location (REL) concept emerged from the programme E2E design work as a means of tackling problems around the matching of meter points and addresses, thereby improving switching reliability.*
- **The REL is a composite of two elements;**
 - *a Registerable Metering Point (RMP) which represents the MPxN; and*
 - *the address where the energy supply is being measured (consumer's address or premises served)*



- *The REL will be displayed on ECOES and DES and will be available to all industry parties to use as they wish.*
- *We are currently considering a regulatory requirement to ensure use of the REL for data validation during the switching process.*