



PCW/Supplier Forum

Consumer Communication & Engagement Working Group – Meeting 4
4 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</i>
2	<i>Consumer Messaging Principles</i>
3	<i>Consumer Perspective – expectations & communications</i> <ul style="list-style-type: none">• <i>Unhappy path messaging</i>• <i>Potential for consumer confusion (multiple comms)</i>• <i>Timing & consistency of messaging</i>• <i>'Ownership' of the consumer</i>
4	<i>Progress against Working Group 'Questions'</i>
5	<i>Proposed Work Plan for this Working Group and dates of future meetings</i>
6	<i>Review of Actions Log</i>
7	<i>Updates/additions to the Forum Risk Register</i>
8	<i>AOB</i>

2. Consumer Messaging Principles

Consumer Messaging Principles at point of sale

- At our last meeting on 1 July, there was agreement that accuracy and consistency of message to the consumer across a number of areas is important. The following are the key consumer messaging principles agreed.

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



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

3. Consumer Perspective – expectations & communications

Consumer journey perspective

Initiation: Day 0

Process: 0 to 4 days from initiation

Completion: 1 to 5 days from initiation



Customer expectations

I want a simple process and a good deal

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

Please confirm when it's all done



PCW

Here are the deals available to you

- Your switch should normally complete within 5 working days (*from the point your Supplier has all information required to progress the switch*)
- 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

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

*Please tell us if you have any special needs

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

You're on supply with us. This is how and when you pay (*for prepayment customers, additional messaging on how and where to top up*)



New Supplier



Old Supplier

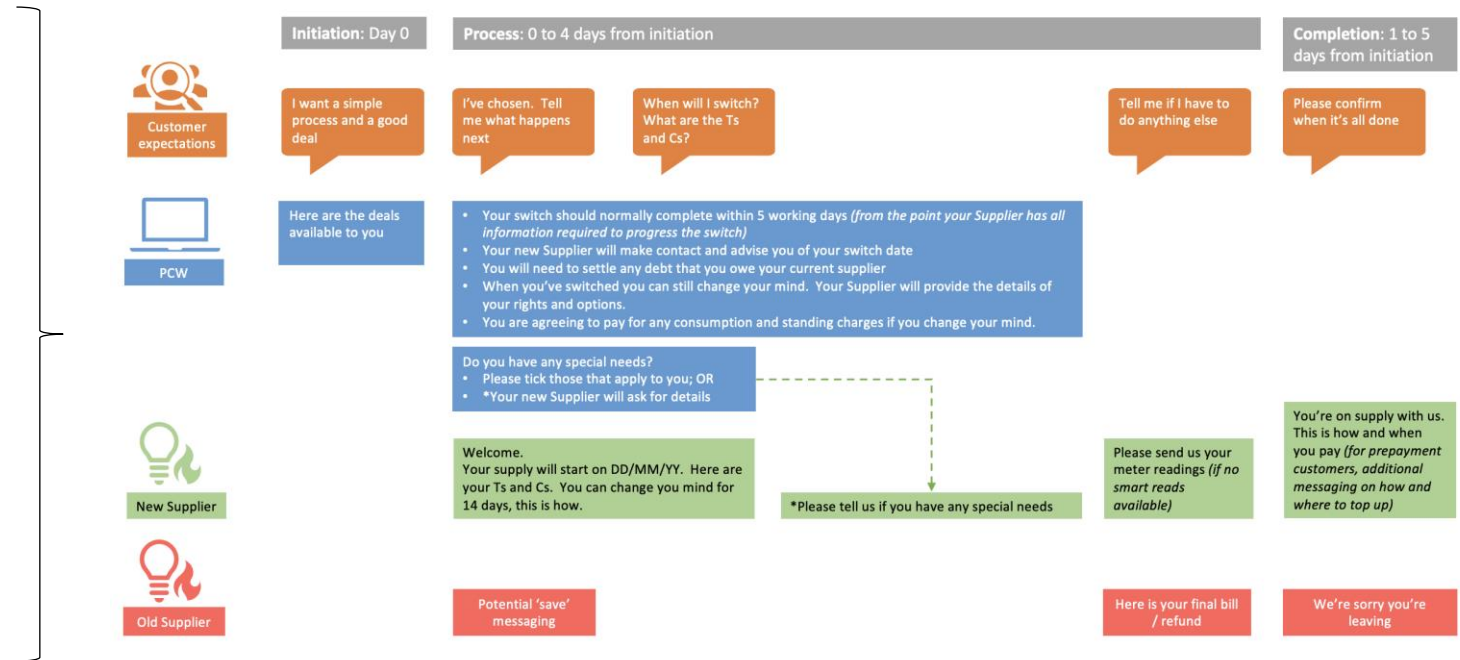
Potential 'save' messaging

Here is your final bill / refund

We're sorry you're leaving

Communications ownership: unhappy paths

- Tariff/meter incompatible
- Supplier objection triggered
- 1 out of 2 registrations has failed
- Prepayment
- Meter not supported
- Standstill period applies
- Anything else?



1. What additional customer communications are required for these scenarios?
2. Does PCW have any responsibility for their delivery?
3. Are there are shortcomings with existing feedback mechanisms?

4. Progress against 'Questions'

Questions for Working Group consideration



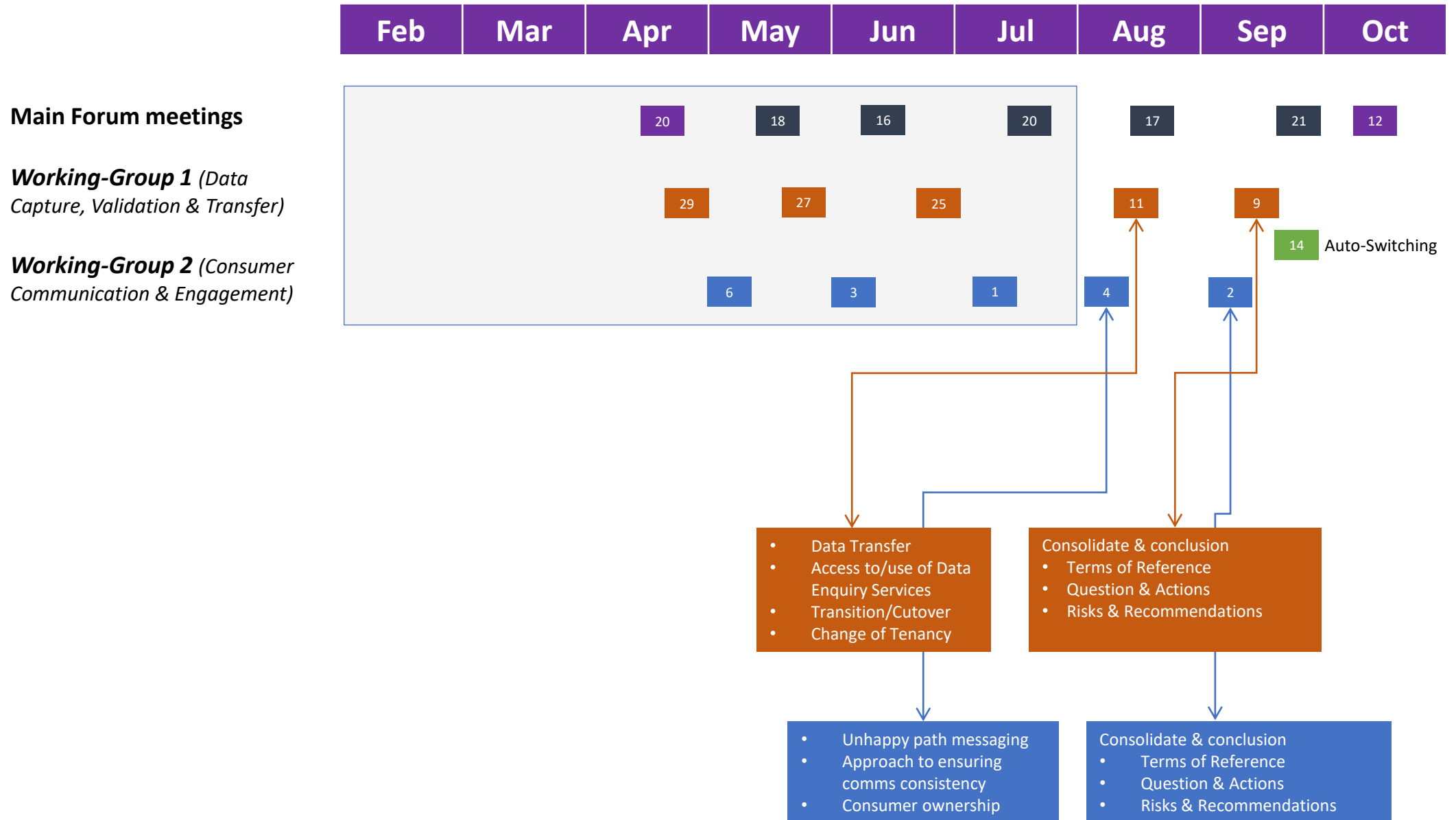
Consumer Communication & Engagement

- Q18: How will PCWs make standstill periods, cool off periods and changes clear to consumers? **Complete**
- Q19: How will a PCW know if there is a standstill period? What action would this trigger? **Complete**
- Q20: How do PCWs communicate offers and the objection process to consumers? **Complete**
- Q21: How will PCWs provide information to consumers about timelines for next steps in the switching process? **Complete**
- Q22: How will future dated switches agreed with consumers be treated by PCWs and Suppliers? **Complete**
- Q23: What are the implications of automated switching services? **To be discussed at separate session in September**
- Q24: Who will own the relationship with the customer along the process, particularly when there are problems with the switch request, or the switch fails? **Discussion at Comms Working Group on 4 August**
- Q25: What are the implications of OFAF (One Fail All Fail) switch requests? **Complete**
- Q26: How will PCWs be aware of differing Supplier offerings at point of implementation, in terms of differing switch lengths? **Complete**
- Q27: How do we ensure that customers are fully informed of process and timing expectations, but not over-promised or mis-informed? **Complete**
- Q28: How do we generally ensure consistent, accurate messaging to consumers? **Principles being agreed at Comms WG**

5. Work Plan & Future meeting dates

Date	Time	Meeting
<i>Thursday 2 September</i>	<i>2pm</i>	<i>Consumer Communication & Engagement Working Group – meeting 5</i>

Proposed approach for future Working Group meetings



6. Actions Log

Consumer Communication & Engagement Working Group (page 1)

Actions Log

Version Date: 3 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: 3 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

7. Risk Register

PCW/Supplier Forum Risk Register (Page 1)

Version Date: 3 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. 19/7 – 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). 19/7 – this is currently being progressed by the Data Capture, Validation & Transfer Working Group
R004	Differing data communication arrangements, between PCWs and Suppliers Main Forum & Data Working Group consideration	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. 19/7 – the Working Groups are currently progressing activities to address this risk.

PCW/Supplier Forum Risks Register (Page 2)

Version Date: 3 August 2021

ID	RISK	DESCRIPTION & IMPACT	NEXT STEPS
R005	<p>Switch status updates and feedback mechanisms between PCWs and Suppliers</p> <p>Main Forum consideration</p>	<p>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.</p>	<p>Consider what improvements could be made to the existing arrangements to mitigate any process issues or consumer detriment. 19/7 – this risk is being considered by the Data Capture, Validation & Transfer Working Group.</p>
R006	<p>Industry metering data triggers unnecessary rejections or tariff errors</p> <p>Data Working Group consideration</p>	<p>Many Suppliers treat legacy two-rate rate meters as single rate for billing. Problems can occur where this is not transparent to PCWs.</p>	<p>Further consideration required to establish the extent of this risk and what actions could be undertaken to mitigate. 19/7 – this risk is being considered by the Data Capture, Validation & Transfer Working Group.</p>
R007	<p>Potential for customer confusion as the timeframe for switch completion dramatically reduces</p> <p>Comms Working Group consideration</p>	<p>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.</p>	<p>To be considered and addressed by the Customer Communication & Engagement Working Group. 19/7 – this risk is being considered by the Consumer Communication & Engagement Working Group.</p>
R008	<p>Absolute clarity required of ‘relevant date’ (when the switch clocks starts ticking)</p> <p>RISK CLOSED</p>	<p>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.</p>	<p>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 been provided.’</p>

PCW/Supplier Forum Risks Register (Page 3)

Version Date: 3 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. 19/7 – an update will be provided at the 20 July Main Forum meeting. A separate session has been agreed to discuss this topic.
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. 19/7 – 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: 3 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.</p> <p>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>19/7 – 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>19/7 – actions are being progressed to identify and address any challenges and blockers associated with PCW access to GES & EES.</p>

8. AOB

Appendices

Terms of Reference (para 4.4)

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

PCW/Supplier Forum Work Plan

