



PCW/Supplier Forum

Data Capture, Validation & Transfer Working Group – Meeting 5
9 September 2021

Competition Act Reminder

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

Agenda

Item	Topic
1	<i>Introduction & meeting aims</i>
2	<i>Progress against Terms of Reference & recap of Working Group discussion</i>
3	<i>Final Review & sign-off of: Data Capture Requirements document, Best Practice for Data Validation and approach to Data Transfer</i>
4	<i>Process Map and Timings – for approval</i>
5	<i>Final Review of Working Group ‘Questions’</i>
6	<i>Review of Actions Log</i>
7	<i>Updates/additions to the Forum Risk Register</i>
8	<i>AOB</i>

2. Progress against Terms of Reference

Terms of Reference (para 4.3)

- *4.3 To consider matters associated with Data Capture, Validation and Transfer, including:*
 - *4.3.1 Identifying the content/scope, formats and processes required to enable the progression of both a 'five working day' and a 'next day' switch;*
 - *4.3.2 The case for and feasibility of a standardised approach versus the need for customisation;*
 - *4.3.3 The timeliness of information provision to Suppliers following initial PCW engagement with the consumer;*
 - *4.3.4 How to implement best practice for the validation of data, and ensure appropriate access to industry data (established and future) for all parties;*
 - *4.3.5 The feedback mechanisms in place/required to exchange information between PCWs and Suppliers during the switching process.*



3. Data Capture, Validation and Transfer

Data Capture Requirements

- There have been no comments received from Forum members on previously circulated versions of the Data Capture Requirements document. The following is therefore being proposed as the final version (from a Data Capture perspective).
- The following slides detail the data items that either are or could be captured at the initial point of consumer contact / point of sale by PCW's.
- It includes both existing and new data items that must be captured to facilitate Faster & More Reliable Switching at go-live and other additional Data Items that it might also be helpful to capture.
- The 'Impact if missing' columns have been based on comments received from parties but may not be representative of all views. Where views expressed are inconsistent this has been reflected in the notes.

Data Capture Requirements (1)

Data Capture requirements		FINAL	7 September 2021				
The table below details Data Items that are or could be captured at the initial point of consumer contact / point of sale by PCW's.							
It includes both existing and new Data Items that must be captured to facilitate Faster & More Reliable Switching at go-live and other additional Data Items that it might also be helpful to capture.							
'Impact if missing' has been based on comments received from parties but may not be representative of all views. Where views expressed are inconsistent this has been reflected in the notes.							
Data Item	Existing / New	Validation required	Validation owner	Impact if missing			Notes (including comments received by forum members)
				Switch fails	Risk of delay or failure	Sub-optimal	
<u>Personal / Contact details</u>							
Title, First Name, Surname	Existing			Red			Consumer provided information.
E-mail address	Existing			Red			Viewed as mandatory by PCWs. For suppliers it can depend on chosen contact method
Telephone/Contact Number(s)	Existing				Yellow		Important to enable engagement with consumers under faster switching timescales, but not always provided or correct
Date of Birth	Existing				Yellow		Varying comments provided described this data item as being both mandatory and optional
<u>Supply Point / Consumption</u>							
Date of Sale	Existing			Red			Important to enable assessment of the overall timeframe for the consumer journey and how long ago the customer made initial contact, but not switch critical
Supply Address	Existing				Yellow		Either customer address or the REL will be essential to the switch, but parties have mixed views on which.
Retail Energy Location	New				Yellow		Information held on Data Enquiry Service portals becomes critical for FMRS. Described by one supplier as 'not switch critical'
MPAN / MPRN Number	Existing			Red			Selection of the correct MPxN is critical to the success of the switch and the reduction of erroneous transfers.
Meter Payment Type (Credit/Prepayment)	Existing			Red			Information required for each fuel – concern about switch speed for traditional prepayment customers (where requirement to send a physical device)
Do you have a smart meter(s)?	Existing				Yellow		Information required for each fuel – access to industry data important
Do you have an Economy 7 meter?	Existing				Yellow		Caution needed over tariff exclusions if suppliers bill as single rate
How much do you spend/consume (for each fuel)?	Existing					Green	If unavailable from customer, access to industry data essential to improve cost estimates. Some concern about ability to access this information.
Market Sector Indicator (Domestic/I&C)	New				Yellow		Indicator will trigger differing objection window periods. Not critical to current switch as will be based on existing value. One Supplier advised it is 'switch critical'.

Data Capture Requirements (2)

Data Item	Existing / New	Validation required	Validation owner	Impact if missing			Notes
				Switch fails	Risk of delay or failure	Sub-optimal	
<u>Tariff & Payment information</u>							
Current Tariff & Supplier (if known)	Existing						Required by PCW for comparison activity.
Current payment method	Existing						Information provided by the consumer.
New Tariff/Product chosen	Existing						Requirement for the consumer to choose a new tariff/product
What day of month to pay your bill?	Existing						Provided by the consumer - default date used if preference not advised
Is Billing Address same as supply?	Existing						Requirement for the consumer to confirm is details are different
Paperless Billing required?	Existing						Often determined by the choice of tariff
<u>Payment / Bank details</u>							
Payment method chosen	Existing						Often linked to choice of tariff/product
Account Holder (Direct Debit)	Existing						May not be mandatory for some payment types
Sort Code (Direct Debit)	Existing						May not be mandatory for some payment types
Account Number (Direct Debit)	Existing						May not be mandatory for some payment types

Data Capture Requirements (3)

Data Item	Existing / New	Validation required	Validation owner	Impact if missing			Notes
				Switch fails	Risk of delay or failure	Sub-optimal	
<u>Consents / Additional information</u>							
Consent to bill during cool-off period	New				Yellow		The 'Consent to Bill' data item should ideally be captured by the PCW at point of sale and passed onto the new Supplier. The arrangements for capturing this information should be agreed bi-laterally as there may be different legal opinions on how this should be presented to the consumer.
Marketing / GDPR Consents	Existing					Green	Important for Suppliers to capture this information at point of sale, but not switch critical.
Warm Homes Discount eligibility	Existing					Green	Not switch critical.
Priority Service Register eligibility	Existing				Yellow		Bilateral agreements on whether/what to capture. Suppliers should be able to map data to standard industry codes
Priority Service Register information	Existing					Green	Bilateral agreements on whether/what to capture. Suppliers should be able to map data to standard industry codes
Customer requested switch date	New				Yellow		Can be up to 28 days into the future. No change in regulation but not currently offered by PCWs. Viewed by some as an unnecessary complication (for most PCWs & customers). Viewed as 'switch critical' by one supplier and empowering for customers. View that consumers can already choose a forward switch date – so no change.
Point of Sale Read	New					Green	Opportunity to capture a read at PoS, but PCWs are concerned that it could be a barrier for some in completing the switch application. Differing rules in gas and electricity opening read arrangements provide complexity.
Consent to perform credit check	Existing			Red			Essential to enable Suppliers to perform credit check
Credit Check related information	Existing				Yellow		Bilateral agreements on whether/what information to capture.
Employment Status (for credit check)	Existing				Yellow		Bilateral agreements on whether/what information to capture.
Residential Status (for credit check)	Existing				Yellow		Bilateral agreements on whether/what information to capture.
Years at Residence (for credit check)	Existing				Yellow		Supplier formats for information capture vary - can be months or years/month
Change of Tenancy indication	New					Green	Suppliers have described as useful (or critical), but some PCWs unsure of the need for this additional question / complexity. Not a new requirement associated with faster switching.

Data Capture – new data items

- Discussions identified the following ‘new’ data items for consideration.

Retail Energy Location	New	Information held on Data Enquiry Service portals becomes critical for FMRS. Described by one supplier as 'not switch critical'
Consent to bill during cool-off period	New	The ‘Consent to Bill’ data item should ideally be captured by the PCW at point of sale and passed onto the new Supplier. The arrangements for capturing this information should be agreed bi-laterally as there may be different legal opinions on how this should be presented to the consumer.
Market Sector Indicator (Domestic/I&C)	New	Indicator will trigger differing objection window periods. Not critical to current switch as will be based on existing value. One Supplier advised it is ‘switch critical’.
Customer requested switch date	New	Can be up to 28 days into the future. No change in regulation but not currently offered by PCWs. Viewed by some as an unnecessary complication (for most PCWs & customers). Viewed as 'switch critical' by one supplier and empowering for customers. View that consumers can already choose a forward switch date – so no change.
Point of Sale Read	New	Opportunity to capture a read at PoS, but PCWs are concerned that it could be a barrier for some in completing the switch application. Differing rules in gas and electricity opening read arrangements provide complexity.
Change of Tenancy indication	New	Suppliers have described as useful (or critical), but some PCWs unsure of the need for this additional question / complexity. Not a new requirement associated with faster switching.

Data Validation

- The slides that follow capture the Forum discussions to date.
- Further consideration is required on the validation of Supply Point/Consumption data items. This is directly linked to the issue of **access to industry data**, which is currently being progressed separately with Ofgem and RECCo.
- All parties recognise that reliability and speed of switching hinge on the quality of data captured at the point of sale. To minimise rejections, PCW data validation must be against the same sources as are used by Suppliers.
- An industry-wide approach might not be achieved. It is expected that PCWs and Suppliers might agree arrangements bilaterally to maximise success rates in switch requests.

Validation of Data (1)

Data Item	Existing / New	Validation required?	Validation Owner
<u>Personal / Contact details</u>			
Title, First Name, Surname	Existing	No	There are no <u>new</u> data validation requirements that have been identified.
E-mail address	Existing	Format	
Telephone/Contact Number(s)	Existing	Format	
Date of Birth	Existing	No	
<u>Supply Point / Consumption</u>			
Date of Sale	Existing	No	Not a future date
Supply Address	Existing	Yes	Access to industry data
Retail Energy Location	New	Yes	Access to industry data
MPAN / MPRN Number	Existing	Yes	Access to industry data
Meter Payment Type (Credit/PP)	Existing		Access to industry data
Do you have a smart meter(s)	Existing		Access to industry data
Do you have an Economy 7 meter?	Existing		Access to industry data
How much do you spend/consume (for each fuel)?	Existing	If req'd	Access to industry data
Market Sector Indicator (Domestic/I&C)	New	No	No validation required

Some questions remain outstanding

Validation of Data (2)

Data Item	Existing / New	Validation required?	Validation Owner
<u>Tariff & Payment information</u>			
Current Tariff & Supplier (if known)	Existing	No	<p>There are no <u>new</u> data validation requirements that have been identified.</p> <p>On 'Paperless Billing' it was noted that in some circumstances it may be prudent to validate this against choice of tariff.</p>
Current payment method	Existing	No	
New Tariff/Product chosen	Existing	Yes	
What day of month to pay your bill?	Existing	No	
Is Billing Address same as supply?	Existing	No	
Paperless Billing required?	Existing	Yes	
<u>Payment / Bank details</u>			
Payment method chosen	Existing	No	<p>There are no <u>new</u> data validation requirements that have been identified.</p> <p>On 'Payment method chosen' noted that this could be validated against choice of tariff.</p>
Account Holder (Direct Debit)	Existing	No	
Sort Code (Direct Debit)	Existing	Yes	
Account Number (Direct Debit)	Existing	Format	

Validation of Data (3)

Data Item	Existing / New	Validation required?	Validation Owner
<u>Consents / Additional information</u>			
Consent to bill during cool-off period	New	No	<p>There are no <u>new</u> data validation requirements that have been identified.</p> <p>Any additional (new) information provided, associated with Consent to bill during cool-off period, Customer Requested Switch date, Point of Sale Read or Change of Tenancy, would not be subject to PCW validation.</p>
Marketing / GDPR Consents	Existing	No	
Warm Homes Discount eligibility	Existing	No	
Priority Service Register eligibility	Existing	No	
Priority Service Register information	Existing	No	
Customer requested switch date	New	No	
Point of Sale Read	New	No	
Consent to perform credit check	Existing	No	
Credit Check related information	Existing	No	
Employment Status (for credit check)	Existing	No	
Residential Status (for credit check)	Existing	No	
Years at Residence (for credit check)	Existing	No	
Change of Tenancy indication	New	No	

Forum position on Data Transfer

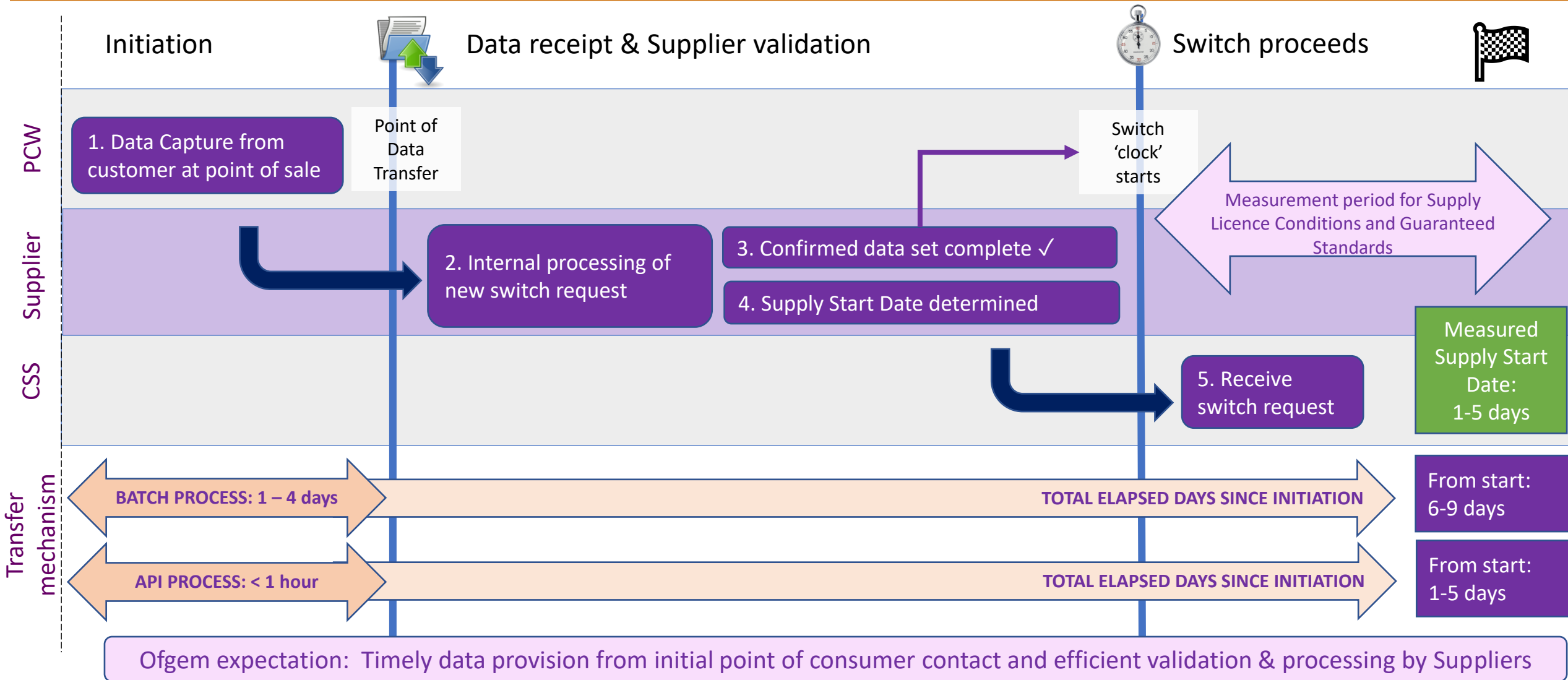
- The Forum has previously agreed the following position.

'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.'

4. Process Map and timings

Process map and timings:

Why data transfer processes will become more important



5. Progress against Working Group 'Questions'

Questions for Working Group consideration



Data Capture, Validation & Transfer

- Q1: How are Suppliers assured of the accuracy and timeliness of data provided by PCWs? How do we achieve more consistent delivery? **Work ongoing**
- Q2: What information, in addition to tariff information, is required from Suppliers that PCWs should pass on to consumers during the first interaction? **Complete**
- Q3: How can PCWs facilitate the capture of opening reads? **Complete**
- Q4: What can be done to ensure that the current meter type is validated and provided to Suppliers? **Linked to Q1**
- Q5: How can PCWs capture and pass on consumer specific data, (e.g., priority services register)? **Complete**
- Q6: What validation activity do Suppliers require PCWs to carry out? **Complete**
- Q7: How will PCWs and Suppliers use industry-available data to give the consumer a smooth sale journey? **Complete**
- Q8: Can PCWs have access to industry data (ECOES and DES) to validate consumer-provided data? **Linked to Q1**
- Q9: How can we ensure that the new Retail Energy Location (REL) is consistently used for validation? **Linked to Q1**
- Q10: What changes need to be made to current data transfer processes to enable the timely provision of information? **Complete**
- Q11: Can batch file processes be amended to address timing concerns such as lack of processing at weekends? Is batch processing viable in the future? **Complete**
- Q12: How do we address errors, rejections and erroneous transfer requests in a timely manner? **Complete**
- Q13: How can we ensure that there are robust feedback loops in place between Suppliers & PCWs? **Complete**
- Q14: Credit Vetting: What are the timing and treatment considerations associated with a next day switch? **Complete**
- Q15: Does auto-switching drive any additional requirements? **Work ongoing**
- Q16: Should the PCW capture Change of Tenancy information at the point of sale? **Complete**
- Q17: Will the new switching arrangements and faster switch speeds have any implications to Collective Switching? **Complete**

6. Review of Actions Log

- Actions associated with this Working Group.

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Actions Log

Version Date: 3 September 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: 3 September 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: 3 September 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: 3 September 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.	Action complete.	Chair	Complete
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

7. Risk Register

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) RISK CLOSED	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). 3/9 – the Forum has concluded discussions on Data Capture, Validation & Transfer.
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 for 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 been provided.’

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ID	RISK	DESCRIPTION & IMPACT	NEXT STEPS
R009	<p>Change of Tenancy events and Auto-Switching arrangements.</p> <p>Auto-Switching session consideration</p>	<p>Change of Tenancy (CoT) events can cause particular problems with auto-switching, including the creation of erroneous transfers and customer inconvenience/detriment.</p>	<p>Further Forum discussion required to consider what improvements could be made to mitigate customer detriment.</p> <p>14/6 – the topic of Auto-Switching is due to be discussed at the Main Forum meeting 3 on 16 June.</p> <p>24/8 – a separate session has been agreed to discuss this topic, scheduled for 14 September.</p>
R010	<p>Data Enquiry Services – future resilience and availability improvements.</p> <p>Data Working Group consideration</p>	<p>It will be critical for Data Enquiry Services to have high levels of resilience and availability as the industry moves to faster switching timeframes.</p>	<p>Requirement to engage with Data Enquiry Service providers to discuss and consider any actions necessary.</p> <p>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.</p>
R011	<p>Retail Energy Location – limited PCW engagement/education of REL requirements and impacts</p> <p>RISK CLOSED</p>	<p>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.</p>	<p>The Chair has taken an action to speak with DCC/Ofgem and seek the provision of REL information session for PCWs.</p> <p>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.</p>
R012	<p>Collective Switching providers – lack of awareness of switching programme</p> <p>RISK CLOSED</p>	<p>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.</p>	<p>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.</p> <p><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></p>

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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>

8. AOB
