

Meeting notes & actions.

Discussion points.

1. Transition / Cutover arrangements

- Presentation provided by Chris Bailey and Paul Morcom (DCC), explaining the programme approach being taken.
- Suppliers will 'hold' switch requests ahead of the transition to new systems. PCWs should transfer data to Suppliers as normal. The aim is to avoid switches spanning two systems architectures. They should start and finish in one.
- There will be a volume cap for each supplier, based on market share (initially allocated but reviewed closer to transition). Supply Start Dates SSDs will need to be managed within those caps. There are no constraints on speed of switch, provided there is no customer harm in going fast. Some recent switch requests might be processed ahead of older ones. Backlog processing will be managed by Suppliers.
- Consumer messaging about SSD will need to be cautious. Guidance will be given in the ECAP (Industry Cutover Plan). The ECAP was released on 15 September for consultation and can be requested from the PMO.
- The importance of consistent and accurate consumer messaging during the transition period was discussed. A consumer advocate member of the forum urged parties to ensure that no consumers are 'stranded' and that communications are clear, concise and easily understandable.
- A Supplier member urged PCWs to get heavily involved early as the transition arrangements are complex.
- A PCW member added that PCWs don't know what they don't know. Engagement with Suppliers is usually commercial, but is also needed at a technology/process level. PCWs need to be told what Suppliers need them to do for cutover.

- **Action:** *There is a requirement for all Suppliers to engage with their PCW partners at the earliest opportunity to discuss the actions and changes required to deliver a smooth transition to the new switching arrangements.*

- **Action:** *The Chair to ensure that this is added as a recommendation to the Final Report.*

- It was noted that the current programme plan has a Go/No-Go decision point during the transition period (circa 2 weeks before the go-live date), but this is subject to ongoing review. A Supplier member suggested there should also be a decision point at 'TO' to confirm that Suppliers are ready to start holding switch requests. DCC noted that this is under discussion.

2. Consideration of Ofgem remarks on Forum ‘agreed positions’ and Consumer Messaging Principles

Customer requested switch dates

- With regards to offering the consumer an option to choose a switch date, a PCW member noted that PCWs ‘cannot make it happen’ in isolation. Future switch dates should be handled by Suppliers.
- A Supplier member agreed. It was also noted that the Ofgem remarks are targeted specifically at PCWs and point of sale.
- A Supplier member observed that the Ofgem expectation of ability to choose a date is not reflected in legal text, making it hard for parties to commit to changes. Hence the forum position of there being no material changes to the current obligations.
- It was noted that if the information was not captured by PCWs one sub-optimal solution might be for PCWs to invite customers to make direct contact with Suppliers for delayed switches.
- A PCW member noted that PCWs can only provide data that Suppliers have requested. Customer-requested switch date is not currently included. Holding back switches before transfer to Suppliers is not an option as tariffs change frequently and can become unavailable.

- **Action:** *The Chair to relay comments and concerns back to Ofgem – specifically noting that although not changed under FMRS, customer-requested switch dates are not part of PCW/Supplier BAU processes today.*

- The Chair referenced a recent conversation with the Chair of the Energy Switch Guarantee (ESG) and discussions that are happening in relation to offering customer a choice of switch date.

- **Action:** *The Chair to further engage with the ESG to ascertain more detail on their discussions and proposals relating to customer requested switch dates.*

- Several concerns were flagged over reporting and how to ensure Suppliers are not penalised for switches delayed at customer request. Also, how potential mismatches in data from CSS and Suppliers (self-reporting) can be reconciled.
- A Supplier member raised concerns over the time required to amend any internal reporting requirements.

- **Action:** *The Chair to flag concerns about the lack of clarity over future reporting requirements relating to switching performance post-implementation and what information is available to provide Supplier clarity on requirements.*

Opening Meter Reads

- The discrepancy in opening read windows between fuels is historic, and will remain misaligned at go-live under the current programme design. This is noted by forum members as a missed opportunity for alignment of the rules.
- A Supplier member expressed surprise that Ofgem were ambivalent on the issue, leaving it to Suppliers to resolve through the industry change management process if a party considered it sufficiently material.
- A Supplier member observed that it is unrealistic to assume that smart reads will be available for the majority of switches and that there are also numerous issues associated with the availability of reads from some smart meters.
- It was agreed that no change was required to the current ‘agreed position’ wording.
- **Action:** *The Chair to include the missed opportunity and process disparity between fuels as an observation in the Final Report.*

Prepayment Meters

- Further to a question from a Supplier member, the Chair confirmed that all switches, including those associated with traditional prepayment meters, are expected to be completed within the five day backstop detailed within the supply licence, although it is recognised by Ofgem that next day switching will not be possible due to the requirement to issue a payment device.
- **Action:** *The Chair to revisit the forum ‘agreed position’ wording in light of Ofgem’s remarks.*

Objections

- The remarks provided by Ofgem were noted as being valid observations.
- **Action:** *The Chair to revisit the forum ‘agreed position’ wording about objections in light of Ofgem’s remarks.*

Determining the Supply Start Date

- It was noted that the remarks raised by Ofgem are linked to the discussion undertaken on customer requested switch dates. Actions as above.

Data Transfer mechanisms/timeliness of data provision

- The remarks provided by Ofgem were acknowledged by the forum, noting that these have been recognised in our discussions to date and have already been included on the forum's 'Process Map & Timings' schematic.
- No further action required.

Speed of switch / Consumer Journey Perspective

- As previously discussed, and captured as Action D1-038 (9 September), it is important to walk Ofgem through the content of the 'Process Map & Timing' schematic, providing associated commentary and linkage to forum agreed positions and regulatory policy interpretations.
- The Chair advised that this action would now be progressed with Ofgem.

3. Progress against Terms of Reference

- An update was provided against the Terms of Reference, all work has been completed.
- It was noted that the additional activity, to give consideration of a future Target Operating Model, will now be deferred until the BEIS Call for Evidence activity has concluded.
- Progress against Questions – a revised Questions paper will be issued after this session. This document is now predominantly complete, with the exception of a few elements relating to outstanding actions and risks.

4. Working Group final updates

- Updates were provided on the closure of the Data Capture, Validation & Transfer and Consumer Communication & Engagement Working Groups in September, along with an update of the Auto-Switching session held on 21 September.

5. Future Engagement

- Forum members supported the following proposal for future forum engagement.
- A Supplier member noted that it would be helpful if Ofgem could attend future sessions, enabling questions raised to be immediately discussed.
 - *The Forum continues with a revised Terms of Reference (to be agreed) until the point of FMRS go-live (implementation window currently 13 June – 15 August)*
 - *Future sessions will be scheduled at ~6 week intervals during H1 2022*
 - *Meetings would be held only if justified by sufficient agenda items*

- **Action:** *The Chair to present the proposal to the RECCo Board for their consideration and extend an invitation to Ofgem to attend any future meetings.*

6. Actions Log

- The Chair noted that two actions remain outstanding, in addition to those taken from today's meetings. These will continue to be progressed.

7. Risk Register

- The Chair advised that four risks remain open.
- R002, R010 & R014 are all related to Data Enquiry Services or access to industry data. These will continue to be progressed.
- It was agreed that R013 (related to the Retail Energy Location) can now be closed. There are no material questions remaining from a PCW perspective and it was noted that Supplier queries and concerns are being progressed separately with DCC & Ofgem.

8. Outlook & Next Steps

- There are no additional, substantive topics to be considered.
- There will be one further 'closure' meeting of the Forum on 18 November.
- Draft versions of project deliverables will be issued for member review by 25 October.
- Comments on, or approval of, these documents are requested by 5 November – or if further discussion is required, following the meeting on 18 November.
- The final report and accompanying documents will be issued by the end of November and presented to the RECCo Board in December.

9. AOB

- None.