



Consumer Journey Forum

CJF19 – 20 October 2021

Competition Act Reminder

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

Consumer Journey Forum (CJF19) - Wednesday 20 October 2021 @ 2.30pm

Agenda

Item	Topic
1	<i>Introduction & meeting aims</i>
2	<i>Review of Actions Log</i>
3	<i>Topic for discussion: Warm Homes Discount</i>
4	<i>Topic for discussion: Billing Windows</i>
5	<i>Topic for discussion: Debt Assignment Protocol</i>
6	<i>PCW/Supplier Forum update</i>
7	<i>Risk Register</i>
8	<i>Diary Planning</i>
9	<i>AOB</i>

2. Review of Actions Log

- Consideration of outstanding actions

Consumer Journey Forum

Actions Log (1)

Version Date: 19 October 2021

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

Consumer Journey Forum

Actions Log (2)

Version Date: 19 October 2021

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

Consumer Journey Forum

Actions Log (3)

Version Date: 19 October 2021

Ref	Date raised	Action	Update	Owner	Status
C1-022	18-Aug-21	Testing. DCC to confirm whether there is any destruction testing scheduled associated with overlapping, multiple switches in end-to-end testing?	Keith Foster (DCC) to progress.	DCC	Ongoing
C1-023	18-Aug-21	Debt Hopping. The Chair to engage with the REC Performance Assurance Code Manager to ascertain whether anything has been proposed around monitoring switch frequency and short supply periods.	There is currently nothing in place to specifically monitor ongoing short supply periods at MPxN level, though it has been noted as a concern. This will also be flagged to Ofgem.	Chair	Complete
C1-024	18-Aug-21	Debt Hopping. The Chair to engage with REC Revenue Protection leads to flag the potential for 'legal' avoidance of paying energy charges in the future.	This has been raised for future consideration, considered to be subjective at this time until.	Chair	Complete
C1-025	18-Aug-21	Prepayment – Self Disconnection. The Chair to engage with Ofgem about Supplier concerns on this topic and requirement for appropriate monitoring.	This has been raised with Ofgem – awaiting response.	Chair	Ongoing
C1-026	18-Aug-21	Prepayment – device provision. The Chair to raise as a general observation/concern with Ofgem.	This has been raised with Ofgem – awaiting response.	Chair	Ongoing
C1-027	18-Aug-21	Debt Assignment Protocol. The Chair to schedule DAP for discussion at a future CJF session.	Topic to be add to the October CJF agenda.	Chair	Complete
C1-028	18-Aug-21	ECOS Security credentials. DCC to provide a response to the question raised.	Keith Foster (DCC) to progress.	DCC	Ongoing
C1-029	22-Sep-21	Risk 014. The Chair to close this risk as mitigation resides with Supplier approaches to their individual operational processes.	Action complete.	Chair	Complete
C1-030	22-Sep-21	Risk 025. The Chair to progress with DCC and add to the November CJF agenda	Chair to progress.	Chair	Ongoing
C1-031	22-Sep-21	Risk 023. The Chair to submit a response to the ECAP consultation on this issue on behalf of the CJF.	Action complete.	Chair	Complete
C1-032	22-Sep-21	Risk 023. The Chair to further discuss Forum concerns as required with Norma Wood and consider any additional next steps.	Action complete.	Chair	Complete

3. Topic for discussion – Warm Homes Discount

- At CJF15 in June it was suggested that this topic should be considered by the forum.
- It was noted that WHD is impacted by the time of year, which drives Supplier responsibilities.
- There was some discussion about whether complexities such as this are understood by the consumer. With a view expressed that it was reasonable for the consumer to expect WHD to simply roll across from Supplier to Supplier.
- It was acknowledged that there is possibly an opportunity for better communication with consumers.
- Does a move to a faster switch have any implications to how Suppliers treat the matter of WHD and how this should be communicated with consumers ?

Warm Homes Discount

What is Warm Home Discount?

- The Warm Home Discount is a one-off £140 payment applied to eligible customers' electricity bills sometime between October and April. It has been designed to help reduce costs for those living on a low income or pension over the winter months.
- Not all suppliers participate in the Warm Home Discount scheme, so you should bear this in mind if considering switching supplier. More suppliers are being brought into the scheme in 2019-20 and then again in 2020-21, but it is still important to check before your switch.
- Payment of a Warm Home Discount does not affect entitlement to a [Winter Fuel Payment](#) or [Cold Weather Payment](#).

Core Group

- To be eligible for Warm Home Discount under the Core Group you must meet the following requirements on a specific date, known as the 'qualifying date':
 - Your energy supplier is a participant in the scheme (at present, suppliers with over 250,000 UK customers are obliged to participate, but smaller companies may do so voluntarily)
 - Your, or your partner's name is on the electricity bill
 - You receive the guarantee credit element of [Pension Credit](#)
- If eligible for the core group, you should receive a letter from the DWP which will let you know whether you need to take any action or confirm any details with them. Usually the discount will be applied automatically without you needing to do anything.
- The qualifying date is usually in July and, if you qualify, you receive a discount the following winter (so meeting the requirements in July 2019 should mean you get a discount in winter 2019-20). The exact date will be available on the [Government website](#).

Broader Group

- Being eligible for the broader group is slightly more complicated. You have to apply directly to your supplier for a discount and they are free to set their own rules on who they help. However, these must include certain standard criteria such as being in receipt of income-related Employment and Support Allowance with a pensioner premium.
- The mandatory criteria and guidelines are set out in the [Warm Home Discount regulations](#).

Warm Homes Discount

What if I switch energy suppliers?

- Nowadays, switching energy suppliers is simple, and switching to a better deal could save you hundreds of pounds in the long run. However, if you receive (or hope to receive) the Warm Home Discount you should bear in mind that not all suppliers participate in the scheme.
- More suppliers are being brought into the scheme in 2019-20 and then again in 2020- 21, but it is still important to check before you switch.

Core Group

- If you are part of the core group and you switch from a participating supplier to another participating supplier, you should still receive the discount automatically.
- If you switch supplier after the qualifying date but met the eligibility criteria at that time, your old supplier is responsible for making the payment, usually by sending you a cheque.
- If you switched from a non-participating to a participating supplier after the qualifying date, you must make a Broader Group application even if you receive guarantee credit.

Broader Group

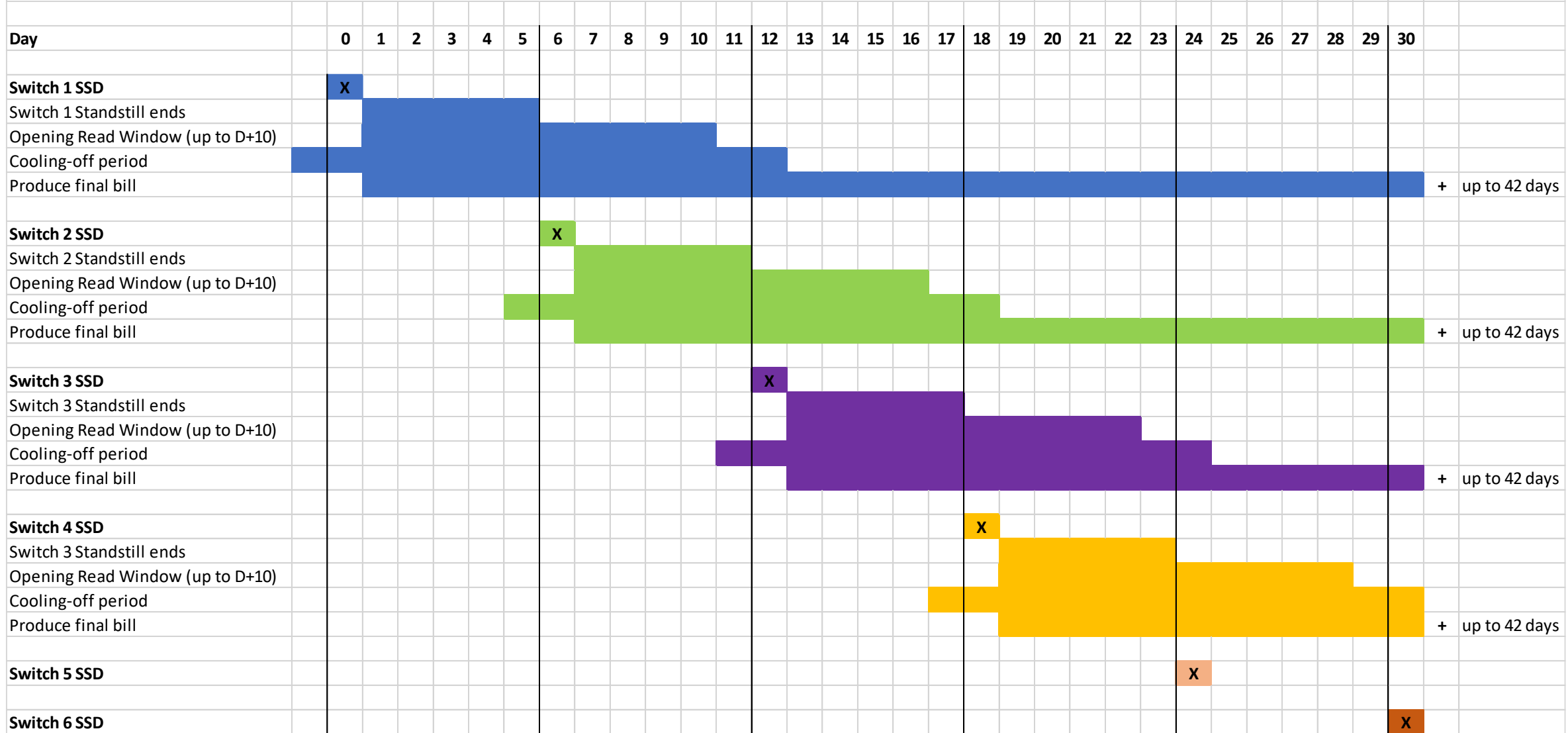
- Broader group applications cannot be transferred between suppliers. This means that regardless of whether you switch to another participating supplier, you will need to resubmit your application. You may wish to check the eligibility criteria before you switch as different suppliers can set different rules. This means you may qualify for the scheme with one supplier but not another.

4. Topic for discussion – Billing Windows

- Initially raised as a topic for future consideration at CJF15 in June.
- There was no specific detail raised or captured, but the forum agreed to consider in due course.
- Particularly an issue when frequent switches occur and there are multiple Billing Windows overlapping.
- Are there any specific observations or concerns that the CJF need to consider on this topic, or is it simply a consequence that Suppliers will need to manage ?

Overview of multiple switch event – Overlapping Billing Windows

Assumes a Next Day Switch for a legacy meter, with the Contract Start Date being the day before SSD (start of cooling-off window)



5. Topic for discussion – Debt Assignment Protocol

- This topic was initially discussed in August at CJF17.
- Following some discussion, it was agreed that this was a topic that required additional focus.
- The *'Assignment of Debt in Relation to Prepayment Meters Agreed Procedure'* for gas and electricity previously resided with the SPAA and MRA. These procedures are now part of the Retail Energy Code.
- REC – SPAA Transition Schedule
 - [Schedule+20+--+SPAA+Transition+Schedule.pdf \(recportal.co.uk\)](#)
- REC – MRA Transition Schedule
 - [Schedule+21+--+MRA+Transition+Schedule.pdf \(recportal.co.uk\)](#)

Debt Assignment Protocol (DAP)

- *Background*
 - *The development of a process that allows outstanding Consumer charges owed to one Supplier to be assigned to another follows an initiative by the Authority. This process enables Consumers with outstanding charges to transfer to the Supplier of their choice in situations where such a transfer would otherwise have been prevented on the grounds of debt.*
- *Purpose*
 - *The procedure sets out the actions that Suppliers are required to undertake in conjunction with the switch process in order to assign outstanding charges owed by Domestic Supply Consumers who have a debt scheduled for repayment on a Prepayment Meter.*
- *Inclusion of estimated debt values between £20 and £500.*
- *The DAP details all the Gaining and Losing Supplier requirements along with the ‘market messages’ that should be utilised. Process Flow Charts are also included.*
- *It is not evident that the processes within the DAP are specifically impacted by a change to switch speed from current to five working days/next day.*
- *Do Forum members have any specific concerns or questions regarding potential impacts associated with FMRS implementation?*

6. PCW/Supplier Forum update

PCW/Supplier Forum - Outlook & Next steps

- There are no additional substantive topics to be considered
- There will be one further 'closure' meeting of the PCW/Supplier Forum on 18 November 2021
- Draft versions of project deliverables will be issued for review by 25 October 2021. These will comprise:
 - Summary report
 - Inventory of data items requiring PCW validation
 - Conclusions on issues and questions raised by Customer Journey Forum
 - Risks Log
 - Statement of 'Agreed Positions'
 - Principles for customer communications
 - Customer expectations of the switching journey (schematic)
 - Data transfer impacts on overall timing and customer experience (schematic)
- Comments on or approval of these documents are requested by 5 November 2021
- Final versions will be prepared by 15 November or, if further discussion is required, following the meeting on 18 November
- A decision on the approach to future engagement needs to be considered

7. Risk Register

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

ID	RISKS	IMPACT	NEXT STEPS	Status
1	<p>There is a risk that communications to consumers are not clear and all necessary information is not provided to them.</p> <p>TOPIC: Communication</p>	<p>This could result in:</p> <ul style="list-style-type: none"> a poor consumer journey which could have financial implications for Suppliers in complaints handling/consumer contacts that were not foreseen as part of the delivery of the Programme; dissatisfied consumers and unwanted switches occurring which could lead to additional Supplier costs in consumer contacts that were not foreseen as part of the delivery of the Programme; consumers not understanding why switches have been unsuccessful; the perception of switching as a hassle. 	<ul style="list-style-type: none"> The PCW/Supplier Forum is considering Consumer Communication & Engagement as part of its activities. 27/5: Forum consensus that whilst the PCW/Supplier is considering consumer communication associated with the PCW journey, there are more generic communication and engagement topics that should be considered by the CJF. COMPLETE: 22/9: Agreed that the approach to consumer communication is Supplier specific and that it is the responsibility of individual Suppliers to ensure that they are appropriately and accurately providing consumers with the information they require. 	CLOSED
2	<p>There is a significant risk associated with the lack of formal programme engagement with PCWs.</p>	<p>PCWs are involved in the critical, initial consumer touch-point for circa 65% of all switch events. The lack of formal engagement with PCWs creates a missed opportunity for ensuring a robust and efficient consumer experience, the requirement to ensure appropriate validation of consumer/industry data and accurate & consistent consumer communication. Essential to co-ordinate interactions between the PCW/Supplier(s)/Consumer in a next day switch world.</p>	<ul style="list-style-type: none"> Greater engagement with PCWs is required to mitigate this risk. The formation of a PCW/Supplier Forum would enable detailed cross-party consideration. COMPLETE: 27/5 - The PCW/Supplier Forum has been formed and is actively considering a range of topics and process issues associated with PCWs, alongside ensuring their greater, more general engagement with the programme. 	CLOSED
3	<p>There is a risk that Suppliers would not be able to complete the billing process in time.</p>	<p>This could result in a financial impact on both 'losing' Suppliers (lost revenue) and consumers (cash management).</p>	<ul style="list-style-type: none"> Further consideration required by Suppliers and the programme to ensure that processes enable parties to meet their licence obligations with respect to billing. COMPLETE: 27/5 - The consensus of the CJF is that this risk is the responsibility of individual Suppliers to resolve and ensure ongoing compliance with billing related requirements and obligations. 	CLOSED
4	<p>Debt-hopping is a risk with the new arrangements, and needs to be identified as an issue in operation.</p> <p>TOPIC: Debt-Hopping</p>	<p>This would be likely to result in increased costs for debt (either to recover or write off debt), increasing costs for all. We could see increased exit fees or additional risk mitigation measures by Suppliers.</p>	<ul style="list-style-type: none"> Further consideration is required to better understand the negative financial impacts to Suppliers and any potential mitigations. 27/5: Forum consensus that there is no evidence that the switching programme is addressing concerns associated with the potential for Debt-Hopping and further consideration by the CJF is required. COMPLETE: 20/8 - The topic of Debt-Hopping was discussed at CJF17 on 18 August. Whilst it will be possible for consumers to switch more quickly, it is not known whether this will mean that they will. Concerns associated with debt-hopping and potential for monitoring has been raised with RECCo and Ofgem. 	CLOSED

Consumer Journey Forum - Risk Register

19 October 2021

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

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

ID	RISKS	IMPACT	NEXT STEPS	Status
12	<p>There is a risk that the CSS processing takes too long to permit the processing of switch requests (SR) that are dependent upon Registration Data validation (e.g. SR6.23) at various stages in the journey.</p> <p>TOPIC: Switch Processing</p>	<p>This could result in some SRs failing unnecessarily under the new switching arrangements. Where SR6.23 fails specifically, the 'gaining' Supplier will not be able to communicate with the SMETS2 meter.</p>	<ul style="list-style-type: none"> Further consideration is required to further assess and consider any required process solutions. COMPLETE: 20/8 - The topic of Switch Processing was discussed at CJF16 & CJF17 with a response being provided by DCC (see meeting notes from CJF17 on 18 August). 	CLOSED
13	<p>There is a risk that issuing and delivery of physical Pre-payment devices will not be possible in the 5 day / next day switch scenario.</p> <p>TOPIC: Prepayment</p>	<p>This could result in consumers not having devices available at the point of new supply.</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed to assess potential impacts and any mitigations. Requirement to ensure switches can be completed in accordance with licence requirements. COMPLETE: 20/8 - The topic of Prepayment was discussed at CJF17 on 18 August. It was noted that it will be the responsibility of individual Suppliers to meet associated licence obligations and Suppliers were advised to raise any concerns they may have on device delivery challenges to Ofgem. 	CLOSED
14	<p>There is a risk that the new Supplier may not be able to reinstate the terms of the previous supplier during a Pre-payment meter switch with a SMETS1 Smart Meter.</p> <p>TOPIC: Smart Metering</p>	<p>This could result in a poor consumer experience where the consumer believed they had a Smart Meter and existing terms would be maintained.</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed to assess potential impacts and any required process solutions. 27/5: Forum consensus that this risk should be further discussed when considering the topic of Smart Metering. COMPLETE: 22/9 - This risk has been closed as it was agreed that mitigation resides with Supplier approaches to their individual operational processes. 	CLOSED
15	<p>There is a risk of incomplete or inconsistent Metering Agent flows and appointments if multiple switches occur in quick succession or if Standstill is set to zero.</p> <p>TOPIC: Switch Processing</p>	<p>This could result in complex exception processes being required resulting in supplier costs and poor consumer experience.</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed to assess potential impacts and any required process solutions. 27/5: Forum consensus that this risk should be further discussed when considering the topic of Switch Processing. COMPLETE: 21/7 - The CJF agreed to close this risk as the requirement for the provision of Metering Agent flows are the responsibility of the Supplier and any impacts should be picked up as part of individual Business Readiness activities. 	CLOSED

ID	RISKS	IMPACT	NEXT STEPS	Status
16	<p>There is a risk on disputed / missing reads that need to be completed within a set window [70 days] within which there may be multiple switches.</p> <p>TOPIC: Opening Reads</p>	<p>Industry processing impact of accurately allocating Change of Supplier reads and consequential impact on consumer experience and customer billing</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed to assess potential impacts and any financial implications. 27/5: Forum consensus that this risk should be further discussed when considering the topic of Opening Reads. COMPLETE: 20/8 – DCC provided a response at CJF17 on 18 August, noting that it is believed that this risk exists today and is unaffected by CSS as it occurs in a period of time after a switch has taken place. Overlapping, multiple switches may complicate things but this will need to be managed by impacted Suppliers. 	CLOSED
17	<p>There is a risk that consumers can switch before the 28 day period when discretionary credit can be considered debt, thus building up debt without objection as they go.</p> <p>TOPIC: Prepayment</p>	<p>Supplier increase in debt provision, resulting in potential increase of tariffs and inequitable treatment of consumers.</p>	<ul style="list-style-type: none"> Further consideration is required to better understand the negative financial impacts to Suppliers and any potential mitigations. The topic of Prepayment was discussed at CJF17 on 18 August. 20/8: The Chair has written to Ofgem expressing Supplier concerns (Action C1-025). 	Ongoing
18	<p>There is a risk that the DNO and the gaining Supplier may hold different information about a customer (vulnerability).</p> <p>TOPIC: Vulnerability/PSR</p>	<p>Missing essential information about a customer may result in a failure to provide the correct support.</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed to assess potential impacts and any required process solutions. 27/5: Forum consensus that this risk should be further discussed when considering the topic of Vulnerability/PSR. COMPLETE: 21/7 - The CJF agreed that nothing WILL materially change with the introduction of FMRS, existing Gas & Electricity processes for holding data are not changing. 	CLOSED
19	<p>There is a risk that engagement challenges with vulnerable customers increase due to the perception of increased barriers.</p> <p>TOPIC: Vulnerability/PSR</p>	<p>Communications are misunderstood or not acted on sufficiently early.</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed, potentially in liaison with relevant customer groups, to assess potential impacts and any mitigations. 27/5: What further Forum consideration is required on this risk? COMPLETE: 22/9 – It was agreed that Suppliers are acutely aware of their obligations in this space and what they should be doing, though approaches will vary. 	CLOSED

ID	RISKS	IMPACT	NEXT STEPS	Status
20	<p>There is a risk that the Debt Assignment Protocol entry and negotiation processes are protracted and complex.</p> <p>TOPIC: Prepayment</p>	<p>This could result in consumers being able to hop several times in new faster Switching environment, leaving a legacy of small debt with a number of 'new' Suppliers.</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed to assess potential impacts and any financial implications. 27/5: Forum consensus that this risk should be further discussed when considering the topic of Prepayment. 20/8: The topic of Prepayment will be discussed at CJF17 on 18 August and it was agreed that further consideration was required at a future CJF session (scheduled for October). 	Ongoing
21	<p>There is a risk that Suppliers will not be able to meet their obligations for opening meter reads on legacy (dumb) meters in a shorter timeframe.</p> <p>TOPIC: Opening Reads</p>	<p>This could result in potential logistic issues relating to the appointment and arrangement for an meter reading agent to attend and obtain an opening read and submit to the Supplier who submits it onto industry parties (Xoserve etc.).</p>	<ul style="list-style-type: none"> Consideration of this risk should be progressed to assess potential impacts and any required process solutions. COMPLETE: 20/8 - DCC provided a response at CJF17 on 18 August, see meeting notes (a matter for impacted Suppliers to resolve between themselves as it does not impact the switch itself). Noted that there would need to be a change to the industry process for opening reads should the Standstill Period be reduced in the future. 	CLOSED
22	<p>Lack of clarity on the E2E design.</p> <p>TOPIC: Regulation</p>	<p>This is likely to manifest in delays to testing or increased operational issues. Identified by the Programme as a current issue and in the process of resolution, hence low priority.</p>	<ul style="list-style-type: none"> Ongoing consideration and awareness is required by the switching programme, on the status of design clarity, to ensure there are no impacts to testing or consequential programme delays. 27/5: Forum consensus that a degree of uncertainty on design clarity remains and that further discussion on this topic is required. COMPLETE: 20/8 - whilst some parties note that there continues to be design clarity concerns, there are established programme arrangements in place to raise these (via the Design Forum, the REC and other working groups). Noted that there is requirement to potentially revisit concerns when the Enduring Change of Supply (ECOS) architecture is more visible. 	CLOSED
23	<p>There is a risk associated with the consumer experience around cutover to the new arrangements.</p> <p>TOPIC: Transition/Cutover</p>	<p>This could result in problems or confusion with the consumer switching experience during a short period of time both before and after the Go-Live date.</p>	<ul style="list-style-type: none"> New 27/5: Forum consensus that this risk should be further discussed when considering the topic of Transition/Cutover. COMPLETE - 22/9: Actions progressed to flag concerns to the programme. 	CLOSED

Consumer Journey Forum - Risk Register

19 October 2021

ID	RISKS	IMPACT	NEXT STEPS	Status
24	<p>There is a potential risk associated with outages and traffic management by the DCC.</p> <p>TOPIC: Switch Processing</p>	<p>This could negatively impact the ability for Suppliers to undertake processes in a timely manner, such as completing the billing process in time.</p>	<ul style="list-style-type: none"> • 27/5: Forum consensus that this risk should be further discussed when considering the topic of Switch Processing. • The topic of Switch Processing was discussed at CJF16 on 21 July. • COMPLETE: 20/8 – DCC provided a clarifying response at CJF17 on 18 August, see meeting notes 	CLOSED
25	<p>There is a requirement to engage with SECAS about the change to DNO credentials.</p> <p>TOPIC: Smart Metering</p>	<p>Concern about changing credentials and possible implications to information used in gas emergencies.</p>	<ul style="list-style-type: none"> • 27/5: Forum consensus that this risk should be further discussed when considering the topic of Smart Metering. • 22/9: It was agreed that this risk requires further investigation and it would be discussed at a future CJF session (November – CJF20). 	Ongoing
26	<p>There are concerns about how Suppliers will access and use the Retail Energy Location.</p> <p>TOPIC: Retail Energy Location</p>	<p>Concern about how the arrangements, as currently articulated to Suppliers, may have a detrimental impact to the acquisition process and the overall consumer journey / experience.</p>	<ul style="list-style-type: none"> • New 22/6: There are ongoing discussions with DCC and Ofgem on Supplier concerns. 	Ongoing

8. Work Plan & Diary Planning

Future Meeting Dates

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

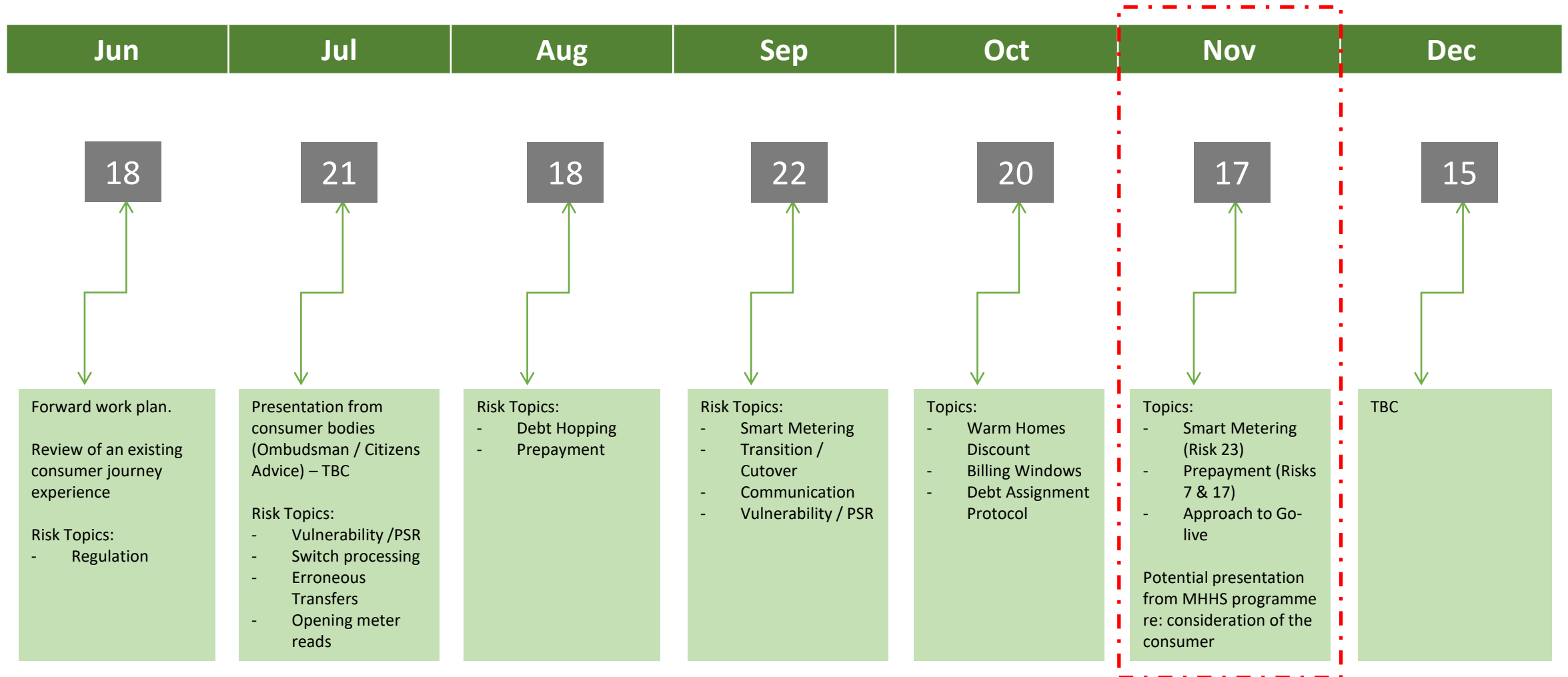
- Is there a requirement for the Consumer Journey Forum to continue during H1 2022, on the glidepath towards go-live ?

Work Plan - topics for future CJF consideration

All topics & risks have now been subject to an initial Forum discussion

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

Proposed approach for future CJF meetings



9. AOB
