



Summary of Agreed Positions

PCW/Supplier Forum
Final_30 November 2021

Summary of Agreed Positions

- This document summarises the positions agreed by the Forum to issues that required some debate before a position could be developed and agreed.
- The issues were driven from three primary sources:
 - The Risk Register
 - The Terms of Reference
 - Questions flagged by the Customer Journey Forum or members of the PCW/Supplier Forum
- A ‘virtual inbox’ was created to ensure that all issues were discussed before they could be considered as ‘agreed’
- The list of agreed topics was also kept under review and, in some cases, positions previously agreed were reopened and considered further (e.g., forward-dated switches).

Forum 'Inbox'

Overview of Topic areas discussed:

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

PCW/Supplier Forum – Agreed Positions

Topic	X-Ref.	Update
Collective Switching	Risk R012 Question 17	The following position has been endorsed by the Forum and communicated to the switching programme/Ofgem. <i>'As the topic of Collective Switching is out of scope of the Forum's Terms of Reference, that it is added to the Risk Register and immediately flagged to the switching programme/Ofgem for their awareness and consideration of any required interaction with, or communication to, Collective Switch providers.'</i>
Confidence Code	ToR 4.5.4 Question 34	The following position has been endorsed by the Forum and communicated to Ofgem. <i>'Following Forum consideration, it has been concluded that no amendments are required to the existing Code of Confidence arrangements as a result of the introduction of Faster & More Reliable Switching and that this view be communicated to Ofgem for information.'</i>
Energy Switch Guarantee	ToR 4.5.4 Question 35	The following position has been endorsed by the Forum and communicated to the independent Chair of the Energy Switch Guarantee. <i>'There will be a requirement to amend the wording of the existing Energy Switch Guarantee commitments, as a result of the introduction of Faster & More Reliable Switching. Specifically, Commitment 3 will require amendment to align with revised Supply Licence Conditions. In addition, Commitment 6 will require re-wording to take into consideration revised cooling-off arrangements.'</i>
Definition of Relevant Date (when the switch 'clock' starts)	Risk R008 Question 21, 31, 32	The following position has been discussed and understood by Forum members. <i>'Ofgem have published updated proposed drafting for the gas and electricity supply licences in May 2021, which includes an updated definition of 'Relevant Date' – see clause 14A.20. In practice, the switch 'clock' will start at the point when the Supplier determines that sufficient information to conduct the switch has been provided, regardless of the sales channel.'</i>
Customer Requested Switch Dates	ToR 4.4.4 Question 22	The following position has been endorsed by the Forum. <i>'The Forum agrees that as there are not any material changes to the current obligations, as detailed within the Supply Licence Conditions, no changes to existing arrangements are required unless agreed bilaterally between parties.'</i>
Credit Vetting	Question 14	The following position has been endorsed by the Forum. <i>'The Forum agrees that there will be no changes required to the existing Data Capture requirements that enable credit vetting to take place.'</i>

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Consumer consent to bill during cool-off	Question 30	<p>The Forum has mixed views on the interpretation of the Supply Licence & Statutory Instrument obligations, however there is Supplier consensus that express consent must be received by the consumer.</p> <p><i>‘There is a requirement for the existing Data Capture arrangements to be amended such that express consent (or not) from the consumer is captured at the point of sale and subsequently provided by the PCW to the acquiring Supplier. The process required for delivering this, including the wording to be used to explain the consent to the consumer, will be subject to bilateral agreement between the PCW and the Supplier.’</i></p>
Opening Meter Reads	Question 3	<p>The Forum has mixed views on the potential benefits of capturing an opening meter reads at the point of sale. It has been noted that there are differences between future gas and electricity opening meter read arrangements and this has been flagged to Ofgem. The following position has therefore been endorsed by the Forum.</p> <p><i>‘A view has been reached that the current arrangements for the capture of opening meter reads should remain as-is, with collection being the responsibility of the Supplier, unless a Supplier bilaterally agrees otherwise with a PCW.’</i></p>
Prepayment meters		<p>The following position has been endorsed by the Forum.</p> <p><i>‘There is a general consensus that no specific messaging from PCWs is necessarily required for prepayment meter switch requests (as standard), though it has been acknowledged that some Suppliers may wish to bilaterally agree bespoke messaging with a PCW. It is noted that during the blueprint phase of the switching programme, Ofgem acknowledged that the approach for traditional prepayment meters may not be suitable for next day switching and may require a longer switch to allow for the delivery of top up devices.’</i></p>
Vulnerability / Priority Services Register	Question 5	<p>The Forum acknowledged that currently, the Supplier requirements of PCWs to capture this information at the point of sale are variable. The following position has subsequently been endorsed by the Forum.</p> <p><i>‘Suppliers and PCWs will continue to agree on a bilateral basis, whether and how to capture this information from consumers at the point of sale. Suppliers have a obligation to identify, capture, record and update this information where applicable and there is a general Forum consensus that the consumer experience can be improved and that where questions are asked and information captured at the point of sale, it should ideally be consistent with the standard industry codes that are utilised across gas, electricity and water. Further, there is consensus that a switch can proceed without this information being captured, but Suppliers will need to consider the timing of obtaining information within the context of faster switching timeframes, particularly a next day switch. It has also been acknowledged that some consumers may be cautious about providing personal data to PCWs.’</i></p>

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Objections	Question 20	Forum discussions have concluded and are summarised below. <i>'The current rules on why existing Suppliers may object will change under faster switching arrangements. It will be the responsibility of PCWs to review their current messaging as required. The objection window parameters will change at go-live. The window for domestic will be 1 working day and the window for non-domestic will be 2 working days. Further, whilst objections can be made concerning Related MPANs, they cannot be made for the reason of incomplete registration (i.e., one MPAN omitted).'</i>
Determining the Supply Start Date (SSD)	Question 21	The following position has been endorsed by the Forum. <i>'In accordance with the definition of 'Relevant Date', the Forum has agreed that Suppliers are best placed to determine the Supply Start Date (SSD) and be responsible for communicating this date to the consumer.'</i>
PCW switching programme engagement	Risk R011	This topic has been concluded. <i>'Ofgem have confirmed that all switching programme meetings and events, with the exception of the three overarching governance groups, are open for attendance by any impacted or interested party. PCWs are therefore welcome to attend and actively engage. In addition the DCC have established a monthly switching programme engagement/update session with PCWs and a separate series of sessions are being undertaken by the DCC to provide further information about the Retail Energy Location.'</i>
Warm Homes Discount (WHD)		This topic has been concluded. <i>'The Forum noted that PCWs who are signatories to and complying with the Ofgem Confidence Code will include this requirement, for other it will remain discretionary. There are no additional implication associated with the implementation of faster switching.'</i>
Standstill Period	Question 18, 19	This topic has been concluded. <i>'The Forum acknowledges that the Standstill Period is a configurable value, that will be initially set to five calendar days from go-live, with Ofgem having a longer-term expectation to review post go-live and potentially amend the period to zero. It was agreed by the Forum, that Suppliers should be responsible to checking the Standstill Period status before setting the Supply Start Date and submitting the switch request to the CSS.'</i>
One Fail All Fail (OFAF)	Question 25	The following position has been endorsed by the Forum. <i>'As there is no material change to the current circumstances associated with the progression of dual fuel switches, it has been concluded that there are no OFAF related implications to the PCW-Supplier processes associated with the introduction of the new switching arrangements.'</i>

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

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