

Consumer Journey Forum - Risk Register

16 February 2022_Final

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

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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. COMPLETE: 20/10 – Further to discussion on Billing Windows and overlapping events associated with multiple switches, it was agreed that no further action is required. 	CLOSED
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). COMPLETE: 26/11 - Ofgem response discussed at CJF20. 	CLOSED
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

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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

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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

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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). COMPLETE: 26/11 - Ofgem response discussed at CJF20. 	CLOSED
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

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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). • COMPLETE: 26/11 - Ofgem response discussed at CJF20. 	CLOSED
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

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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 (February – CJF21). • COMPLETE: 16/2 – The CJF agreed that no further action is required and that the risk can be closed. 	CLOSED
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"> • 22/6: There are ongoing discussions with DCC and Ofgem on Supplier concerns. • COMPLETE: 20/10 – There has been engagement between DCC and PCW's relating to access to and use of the REL. Requirement for PCWs and Suppliers to bi-laterally agree processes for validation as required. 	CLOSED